City & County of Denver

Community Development Block Grant (CDBG)
Home Investment Partnerships Program (HOME)
Housing Opportunities for Persons with AIDS (HOPWA)
Hearth Emergency Solutions Grant (HESG)
Michael B. Hancock
Mayor of Denver

City Council

District 1  Amanda Sandoval
District 2  Kevin Flynn
District 3  Jamie Torres
District 4  Kendra Black
District 5  Amanda Sawyer
District 6  Paul Kashmann
District 7  Jolon Clark
District 8  Christopher Herndon
District 9  Candi CdeBaca
District 10 Chris Hines
District 11 Stacie Gilmore
At-Large Robin Kniech
At-Large Deborah Ortega

Denver Economic Development & Opportunity

Eric Hiraga
Executive Director

Denver Human Services

Don Mares
Executive Director

Key Participants

Amy Mueller Edinger, Chief Operating Officer, DEDO
Jeff Romine, Chief Economist, DEDO
Britta Fisher, Chief Housing Officer, DEDO
Deborah Cameron, Chief Business Officer, DEDO
Irene Aguilar, Neighborhood Equity and Stabilization, DEDO
Sylvia Smith, Neighborhoods, DEDO
Doug Selbee, Housing & Economic Development, DEDO
Laura Brudzynski, Housing Policy & Programs, DEDO
Turid Nagel-Casebolt, Business Development, DEDO
Rachel King, Housing & Community Development, DEDO
Chiquita McGowin, Housing Finance, DEDO
Ami Webb, Housing Finance, DEDO
Jen Morris, Marketing & Communications, DEDO
Bernard Brady, Denver Human Services
Stella Madrid, Denver Housing Authority
Respectfully submitted to the Citizens of Denver, CO and to the:
U.S. Department of Housing and Urban Development
Denver Field Office, Region VIII
Office of Community Planning and Development
1670 Broadway
Denver, CO 80202

Submitted by:
City and County of Denver
Denver Economic Development & Opportunity
101 West Colfax Ave
Denver, CO 80202

Prepared by:
Rachel King
Housing & Community Development Administrator

With Assistance From:
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Application for Federal Assistance SF-424

*1. Type of Submission:
   [ ] Preapplication
   [ ] Application
   [ ] Changed/Corrected Application

*2. Type of Application:
   [ ] New
   [ ] Continuation
   [ ] Revision
   [ ] Other (Specify):

*3. Date Received: 7/12/2019

*4. Applicant Identifier: 84-6000580

5a. Federal Entity Identifier: 

5b. Federal Award Identifier: 

State Use Only:

6. Date Received by State: 

7. State Application Identifier: 

8. APPLICANT INFORMATION:

*a. Legal Name: City and County of Denver

*b. Employer/Taxpayer Identification Number (EIN/TIN): 84-6000580

*c. Organizational DUNS: 034108758

*d. Address:

   *Street1: 101 W. Colfax Ave.

   *City: Denver

   *State: CO: Colorado

   *Country: USA: UNITED STATES

   *Zip / Postal Code: 80202

*e. Organizational Unit:

   Department Name: Office of Economic Development

   Division Name: 

*f. Name and contact information of person to be contacted on matters involving this application:

   Prefix: Mr.

   *First Name: Eric

   Middle Name: 

   *Last Name: Hiraga

   Suffix: 

   Title: Executive Director

   Organizational Affiliation: 

   *Telephone Number: 720-913-1561

   Fax Number: 

   *Email: Eric.Hiraga@denvergov.org
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<td><strong>U.S. Department of Housing and Urban Development</strong></td>
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Attach supporting documents as specified in agency instructions.
Application for Federal Assistance SF-424

16. Congressional Districts Of:
   * a. Applicant  
   * b. Program/Project  
   Attach additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
   * a. Start Date: 01/01/2019  
   * b. End Date: 12/31/2019

18. Estimated Funding ($):
   * a. Federal 6,796,880
   * b. Applicant 0
   * c. State 0
   * d. Local 0
   * e. Other 0
   * f. Program Income 2,503,000
   * g. TOTAL 9,299,880

19. Is Application Subject to Review By State Under Executive Order 12372 Process?  
   □ a. This application was made available to the State under the Executive Order 12372 Process for review on  
   □ b. Program is subject to E.O. 12372 but has not been selected by the State for review.  
   x c. Program is not covered by E.O. 12372.

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)  
   □ Yes  x No  
   If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)
   x **I AGREE**

   ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr.  
* First Name: Eric
Middle Name:
* Last Name: Hiraga
Suffix:

* Title: Executive Director

* Telephone Number: 720-913-1561  
Fax Number:

* Email: Eric.Hiraga@denvergov.org

* Signature of Authorized Representative:  
* Date Signed: 7-11-19
Application for Federal Assistance SF-424

1. Type of Submission:
   - Preapplication
   - Application
   - Changed/Corrected Application

2. Type of Application:
   - New
   - Continuation
   - Revision

3. Date Received:
   7/12/2019

4. Applicant Identifier:
   84-6000580

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

   a. Legal Name: City and County of Denver

   b. Employer/Taxpayer Identification Number (EIN/TIN):
      84-6000580

   c. Organizational DUNS:
      80202

   d. Address:
      * Street1: 101 W. Colfax Ave.
      * City: Denver
      * State: CO: Colorado
      * Country: USA: UNITED STATES
      * Zip / Postal Code: 80202

   e. Organizational Unit:
      Department Name: Office of Economic Development

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Application for Federal Assistance SF-424

9. Type of Applicant 1: Select Applicant Type:
   B: County Government

Type of Applicant 2: Select Applicant Type:
   C: City or Township Government

Type of Applicant 3: Select Applicant Type:

* Other (specify):

10. Name of Federal Agency:
   U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:
    [Blank]
    CFDA Title:

12. Funding Opportunity Number:
    [4:239]
    * Title:
    HOME Investment Partnership Entitlement Grant

13. Competition Identification Number:
    n/a
    Title:
    n/a

14. Areas Affected by Project (Cities, Counties, States, etc.):

15. Descriptive Title of Applicant's Project:
    n/a

Attach supporting documents as specified in agency instructions.
Application for Federal Assistance SF-424

16. Congressional Districts Of:
   * a. Applicant
   * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
   * a. Start Date: 01/01/2019
   * b. End Date: 12/31/2019

18. Estimated Funding ($):
   * a. Federal
   * b. Applicant
   * c. State
   * d. Local
   * e. Other
   * f. Program Income
   * g. TOTAL

   2,935,765
   0
   0
   0
   1,000,000

   3,935,765

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   a. This application was made available to the State under the Executive Order 12372 Process for review on
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20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
   Yes  x  No

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* Last Name: Hiraga

Suffix:  

* Title: Executive Director

* Telephone Number: 720-913-1561  
Fax Number:  

* Email: Eric.Hiraga@denvergov.org

* Signature of Authorized Representative:  
* Date Signed: 9-11-19
### Application for Federal Assistance SF-424

#### 9. Type of Applicant 1: Select Applicant Type:
- **B: County Government**
- **C: City or Township Government**
- **Other (specify):**

#### 10. Name of Federal Agency:
- **U.S. Department of Housing and Urban Development**

#### 11. Catalog of Federal Domestic Assistance Number:
- **CFDA Title:**

#### 12. Funding Opportunity Number:
- **14.241**
- **Title:**
  - HOPWA Entitlement Grant

#### 13. Competition Identification Number:
- **n/a**
- **Title:**
  - n/a

#### 14. Areas Affected by Project (Cities, Counties, States, etc.):

#### 15. Descriptive Title of Applicant's Project:
- **n/a**

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Application for Federal Assistance SF-424

16. Congressional Districts Of:
   * a. Applicant [ ]
   * b. Program/Project [ ]
   
   Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
   * a. Start Date: 01/01/2019
   * b. End Date: 12/31/2019

18. Estimated Funding ($):
   * a. Federal [ ]
   * b. Applicant [ ]
   * c. State [ ]
   * d. Local [ ]
   * e. Other [ ]
   * f. Program Income [ ]
   * g. TOTAL [2278782]

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   Yes [ ]
   No [X]
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X **I AGREE**

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Authorized Representative:

Prefix: Mr. [X]
First Name: Eric
Middle Name:

* Last Name: Hiraga
Suffix:

* Title: Executive Director

* Telephone Number: 720-913-1561
Fax Number:

* Email: Eric.Hiraga@denvergov.org

* Signature of Authorized Representative: [Signature]
* Date Signed: 7-11-19
Application for Federal Assistance SF-424

1. Type of Submission:
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   - Changed/Corrected Application

2. Type of Application:
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   - Continuation
   - Revision
   - Other (Specify): 

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   7/12/2019

4. Applicant Identifier:
   84-6000580

5. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

   a. Legal Name: City and County of Denver

   b. Employer/Taxpayer Identification Number (EIN/TIN):
      84-6000580

   c. Organizational DUNS:
      034108758

   d. Address:
      101 W. Colfax Ave.
      Street:
      City: Denver
      County/Parish:
      State: CO: Colorado
      Province:
      Country: USA: UNITED STATES
      Zip / Postal Code: 80202

   e. Organizational Unit:
      Department Name: Office of Economic Development
      Division Name:

   f. Name and contact information of person to be contacted on matters involving this application:
      Prefix: Mr.
      First Name: Eric
      Middle Name:
      Last Name: Hiraga
      Suffix:
      Title: Executive Director
      Organizational Affiliation:

      * Telephone Number: 720-913-1500
      Fax Number:
      * Email: Eric.Hiraga@denvergov.org
## Application for Federal Assistance SF-424

### 9. Type of Applicant: Select Applicant Type:

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### 10. Name of Federal Agency:

**Dept. of Housing and Urban Development**

### 11. Catalog of Federal Domestic Assistance Number:

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### 12. Funding Opportunity Number:

**14.231**

**Title:**

**Emergency Solutions Entitlement Grant**

### 13. Competition Identification Number:

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### 14. Areas Affected by Project (Cities, Counties, States, etc.):

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### 15. Descriptive Title of Applicant's Project:

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**Application for Federal Assistance SF-424**

16. Congressional Districts Of:
   * a. Applicant 1
   * b. Program/Project 1
   
   Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
   * a. Start Date: 01/01/2019
   * b. End Date: 12/31/2019

18. Estimated Funding ($):

   * a. Federal 582,032
   * b. Applicant 0
   * c. State 0
   * d. Local 0
   * e. Other 0
   * f. Program Income 0
   * g. TOTAL 582,032

19. Is Application Subject to Review By State Under Executive Order 12372 Process?
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   - [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
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20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
   - [ ] Yes
   - [x] No
   
   If "Yes", provide explanation and attach

21. "By signing this application, I certify (1) to the statements contained in the list of certifications and assurances and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required certifications and assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 21, Section 1001)

   [x] **I AGREE**

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**Authorized Representative:**

Prefix: Mr.  
* First Name: Eric

Middle Name:  

* Last Name: Hiraga

Suffix:  

* Title: Executive Director

* Telephone Number: 720-913-1561  
Fax Number: 

* Email: Eric.Hiraga@denvergov.org

* Signature of Authorized Representative:  
* Date Signed: 4-11-19
CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized Official

Executive Director

7-11-19

Date

Title
Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.
Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

Executive Director

Title

7-11-19

Date
OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

__________________________________________  ________________
Signature of Authorized Official                                  Date

__________________________________________
Title
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

Signature of Authorized Official ________________________ Date 7-11-19

Executive Director

Title
Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.
Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature of Authorized Official  2-11-19  Date

Executive Director
Title
Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility.

2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature of Authorized Official

[Signature]

Date

7-11-19

Executive Director

Title
APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification
This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.
CDBG

ASSURANCES - CONSTRUCTION PROGRAMS

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Standard Form 424D (Rev. 7-97)

Prescribed by OMB Circular A-102
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**Signature of Authorized Certifying Official**

![Signature]

**Title**

Executive Director

**Applicant Organization**

Denver Economic Development Opportunity

**Date Submitted**

7-19-19
ASSURANCES - CONSTRUCTION PROGRAMS

PUBLIC REPORTING BURDEN FOR THIS COLLECTION OF INFORMATION IS ESTIMATED TO AVERAGE 15 MINUTES PER RESPONSE, INCLUDING TIME FOR REVIEWING INSTRUCTIONS, SEARCHING EXISTING DATA SOURCES, GATHERING AND MAINTAINING THE DATA NEEDED, AND COMPLETING AND REVIEWING THE COLLECTION OF INFORMATION. SEND COMMENTS REGARDING THE BURDEN ESTIMATE OR ANY OTHER ASPECT OF THIS COLLECTION OF INFORMATION, INCLUDING SUGGESTIONS FOR REDUCING THIS BURDEN, TO THE OFFICE OF MANAGEMENT AND BUDGET, PAPERWORK REDUCTION PROJECT (0348-0042), WASHINGTON, DC 20503.

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APPLICANT ORGANIZATION

DATE SUBMITTED

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12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.


14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<table>
<thead>
<tr>
<th>Signature of Authorized Certifying Official</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Signature]</td>
<td>Executive Director</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Applicant Organization</th>
<th>Date Submitted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denver Economic Development Opportunity</td>
<td>7/19/19</td>
</tr>
</tbody>
</table>

SF-424D (Rev. 7-97) Back
Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

This section provides a brief summary of the topics covered in the City and County of Denver 2019-2023 Consolidated Plan, Strategic Plan and 2019 Annual Action Plan. This plan includes a needs assessment and housing market analysis to identify the most pressing housing and community development needs as well as the current infrastructure in place to serve low- and moderate-income residents and residents with special needs. The Strategic Plan outlines Denver’s goals to address those needs and the priorities for allocating federal funds over the next five years. Denver expects to receive the following entitlement grants annually during the planning period of 2019-2023:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Emergency Solutions Grant (ESG)

The 2019 Annual Action plan reports on the status of needs and outcomes the City expects to achieve in the coming year. All of the activities mentioned in this Action Plan are based on current priorities and quantified by level of need. By addressing these priorities, the City hopes to meet local objectives stated in the Consolidated Plan. All the proposed projects and activities are intended to principally benefit residents of Denver who have extremely low, low and moderate-incomes, and populations that have special needs, such as elderly, disabled and HIV/AIDS families and individuals.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City has identified the following goals for the planning period:

- Create and preserve housing affordability, accessibility, and quality
- Support business and workforce development
- Foster equitable access to city and neighborhood amenities and services
- Assist people who are homeless and at-risk of homelessness
- Assist populations with special needs
3. Evaluation of past performance

The City and County of Denver was able to meet all of its stated targets in the previous Consolidated Plan (2013-2018). Denver has funded a variety of programs and activities with HUD block grants and continues to work to address the greatest housing, community and economic development needs in the city. Denver intends to continue these successful programs and activities during the current planning period (2019-2023).

4. Summary of citizen participation process and consultation process

In preparation for the Consolidated Plan, the City and County of Denver consulted with non-profit and for-profit housing developers, community members, advocacy groups, government and industry representatives to discuss housing and community development needs. In addition, the City consulted with representatives of organizations focused on the needs of the elderly, fair housing, childcare and youth services, public housing, transportation, and health services, broadband and resiliency. Avenues for engagement included a stakeholder survey, one-on-one interviews and community meetings.

Additionally, prior to the development of the Consolidated Plan, the City and County of Denver was in the process of developing a regional Analysis of Impediments to Fair Housing Choice (AI), which included extensive community engagement in the form of a resident survey, focus groups, pop-up engagement, and community meetings. These efforts resulted in the input of over 6,300 residents and stakeholders regionwide, including over 2,000 resident survey respondents from Denver alone.

5. Summary of public comments

The City held four community meetings as part of the resident outreach for the Consolidated Plan. One meeting was held before the public comment period and serves as the public hearing prior to public comment based on HUD’s requirements. Three meetings were held during the public comment period. All meetings were advertised in both English and Spanish and met HUD requirements for public notice.

In total 16 people attended the community meetings, including families, stakeholders, residents, and community advocates. The City also received one written public comment. Details on the public comments provided are discussed in the Public Consultation Appendix.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments or views received were accepted.

7. Summary

See above.
The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Agency</td>
<td>DENVER</td>
<td></td>
</tr>
<tr>
<td>CDBG Administrator</td>
<td>DENVER</td>
<td>Denver Economic Development &amp; Opportunity</td>
</tr>
<tr>
<td>HOPWA Administrator</td>
<td>DENVER</td>
<td>Denver Economic Development &amp; Opportunity</td>
</tr>
<tr>
<td>HOME Administrator</td>
<td>DENVER</td>
<td>Denver Economic Development &amp; Opportunity</td>
</tr>
<tr>
<td>ESG Administrator</td>
<td>DENVER</td>
<td>Department of Human Services</td>
</tr>
<tr>
<td>HOPWA-C Administrator</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

Rachel King
Acting Director of Housing Compliance
Denver Economic Development & Opportunity
City & County of Denver
201 W. Colfax Ave., Dept 204
Denver, CO 80202
Rachel.King@denvergov.org
PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

Please see the citizen participation section attached to the 2019-2023 Consolidated Plan for a description of the consultation conducted during the process.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

In 2016, due to the creation of its new dedicated Affordable Housing Fund, the City established the Housing Advisory Committee, or “HAC”, to provide strategic input regarding the uses of that fund. This committee replaced the previous Mayor’s Housing Task Force Committee. The new committee includes representation from the Public Housing Authority, various City agencies and partners, including nonprofit service providers and developers, and several City Council-appointed seats, including a community member, Council representative, and housing advocate. In addition, the City continues to meet with partners throughout the City to aide in providing services to residents of Denver.

In 2018, the City completed its new five-year housing plan, Housing an Inclusive Denver. This plan states the City’s principles, priorities, goals and initiatives concerning the City’s housing needs for 2018-2022. The priorities set in this plan support the goals and objectives of HUD. The plan is located at: https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing/HousingInclusiveDenver_FINAL_020918.pdf.

In April 2019, OED hosted its Annual Housing Form in support of affordable housing. The Forum is an opportunity for local affordable housing developers and supporters to explore potential solutions and discuss housing issues at a regional and national level.

In addition, in 2017 the City entered into an intergovernmental agreement with the Housing Authority of the City and County of Denver, City of Aurora, Aurora Housing Authority, and the Boulder/Broomfield HOME Consortium, which includes the City of Longmont, Boulder County, the City and County of Broomfield, Boulder Housing Partners, City of Boulder, Boulder County Housing Authority and Longmont Housing Authority, to submit an Assessment of Fair Housing (AFH) for 2019-2023. As the submission of the AFH was originally due by April 6, 2018, the City initiated public meetings and other outreach efforts in late 2017 to hear from citizens about issues affecting their community and identify areas of concern in regards to fair housing and housing barriers. HUD published a notice on January 5, 2018, announcing that the AFH requirement was postponed until October 2020. Therefore, the statutory requirement defaults back to the previous Analysis of Impediments (AI). As Denver last updated its AI in 2015, Denver will use the analysis conducted under the AFH to update its AI as part of the planning process in the 2019-2023 Consolidated Plan.
The City also committed to be a co-applicant and Neighborhood lead agency for the Denver Housing Authority Choice Neighborhood grant, the Sun Valley Transformation Plan. DHA was awarded $30 million dollars under Choice Neighborhoods, and 2018 was the beginning of the five-year grant process. The SVTP has a goal of transforming Sun Valley with a focus on housing, neighborhood access, business/employment opportunity, and the people living in the existing public housing and those within the greater neighborhood.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

City of Denver, including Denver’s Road Home, is an active partner with Metro Denver Homeless Initiative (MDHI) /CoC, and participates in stakeholder meetings and committees, and works with homeless service providers to assess the ongoing needs of homeless population and to respond with new or expanded services and programs as resources are available. Denver Human Services (DHS) staff have assisted MDHI in the development of written standards for the ESG funded Rapid Rehousing (RRH) programs of our CoC region. The goal of the written standards is to merge key elements of the HUD regulations with the processes and priorities of MDHI and guarantee that RRH funding is administered consistently, transparently, and as effectively as possible. They are currently in final draft, open for public comment and expected to be adopted by MDHI Board of Directors in the Spring.

In addition to ESG funded Rapid Rehousing, the City is using other funds for similar Rapid Rehousing programs. Volunteers of America will serve single adults, Salvation Army will serve families as well as singles and St. Francis Center will serve singles adults and ex-offenders. DHS/DRH is funding diversion programs in partnership with community-based organizations as a means for preventing homeless individuals and families from entering shelters. St. Francis Center will serve single adults and Family Promise will serve families. In addition to shelter diversion there will be support for family reunification and child care.

DHS/DRH is also supporting a transitional housing program for homeless youth in partnership with Urban Peak and permanent supportive housing of veterans at the 4th Quarter in partnership with Denver Housing Authority and VA.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

City of Denver is a key stakeholder with our regional Continuum of Care, Metro Denver Homeless Initiative (MDHI), to prioritize ESG objectives. Current priorities are Rapid Re-Housing, Homeless Prevention, Essential Services/Operations, and Administration. These priorities are evaluated annually and taken in consideration for standardized performance measures and outcomes. City of Denver, MDHI / CoC and all homeless service providers are participating in OneHome, a coordinated entry and housing
placement program that enables the Denver community to access and identify the housing and support needs of persons experiencing homelessness. OneHome helps target mobile outreach and housing navigation for people with the greatest needs. Through use of the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT), OneHome matches the right level of service and housing intervention as quickly and efficiently as possible, while being respectful of client choice and local providers.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Denver Workforce Development Board</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Business Development</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Denver Workforce Development Board was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Downtown Denver Partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Neighborhood/Community</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Downtown Denver Partnership was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Wells Fargo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Community Investors</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Wells Fargo was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Colorado Housing and Finance Authority</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Housing Funder</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Colorado Housing and Finance Authority was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Colorado Division of Housing</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Housing Funder</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Colorado Division of Housing was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Metro Denver Homeless Initiative</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Services- Special Needs (Homelessness)</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Metro Denver Homeless Initiative was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Bayaud Enterprises</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Services- Special Needs</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Bayaud Enterprises was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
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<tr>
<td>Agency/Group/Organization</td>
<td>Denver Rescue Mission</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Services- Special Needs</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>------------------------------------------------------</td>
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</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Denver Rescue Mission was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Mile High Community Loan Fund</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Business Development</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Mile High Community Loan Fund was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Denver Media Foundation/Denver Open Media</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Broadband/Digital Inclusion</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Denver Media Foundation/Denver Open Media was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Dish Network</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Broadband/Digital Inclusion</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Dish Network was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>City of Denver Emergency Operations Center (EOC), a function of the Office of Emergency Management</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Emergency Management/Natural Disaster Resiliency</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-------------------------------------------------</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The EOC was consulted in a one-on-one stakeholder interview. Feedback will be incorporated in the needs, priorities, and goals of the Plan.</td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Stakeholder survey respondents (292 total respondents)</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Wide range of services, industries, and providers</td>
</tr>
<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>NA, MA, AP, and SP.</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Online survey conducted specifically for the Consolidated Plan including questions on current needs, market, conditions, goals, strategies, priorities, and institutional infrastructure.</td>
</tr>
</tbody>
</table>

Table 2 – Agencies, groups, organizations who participated

**Identify any Agency Types not consulted and provide rationale for not consulting**

The City and County of Denver contacted a variety of agency types and partnering organizations in preparing the FY 2019-23 Consolidated Plan or FY 2019-20 Annual Action Plan. No agencies were intentionally excluded from consultation.
### Other local/regional/state/federal planning efforts considered when preparing the Plan

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>City and County of Denver</td>
<td>Help to inform current conditions of persons experiencing homelessness and guide Strategic Plan.</td>
</tr>
<tr>
<td>Regional Analysis of Impediments to Fair Housing Choice – Denver, Aurora, Boulder</td>
<td>City and County of Denver</td>
<td>Strategic Plan goals include affirmatively furthering fair housing and reference the goals matrix of the Regional AI.</td>
</tr>
<tr>
<td>City and County of Denver 2013-2018 Consolidated Plan, Strategic Plan, and associated Annual Action Plans</td>
<td>City and County of Denver</td>
<td>Strategic Plan goals build on the previous Consolidated Plan goals but adapt and refine them to the current needs of the community.</td>
</tr>
<tr>
<td>Denveright - Comprehensive Plan 2040</td>
<td>City and County of Denver</td>
<td>Long term planning goals in Denveright were considered and incorporated into Strategic Plan goal setting.</td>
</tr>
<tr>
<td>Neighborhood Planning Initiative Strategic Plan</td>
<td>City and County of Denver</td>
<td>Long term planning goals in the Neighborhood Planning Initiative Strategic Plan were considered and incorporated into Strategic Plan goal setting.</td>
</tr>
<tr>
<td>Blueprint Denver</td>
<td>City and County of Denver</td>
<td>Long term planning goals in Blueprint Denver were considered and incorporated into Strategic Plan goal setting.</td>
</tr>
<tr>
<td>Housing an Inclusive Denver – Annual Action Plan 2019</td>
<td>City and County of Denver</td>
<td>Goals from Housing an Inclusive Denver are incorporated in the housing-related goals of the Strategic Plan.</td>
</tr>
<tr>
<td>Propel Denver (DED Strategic Plan) 2019</td>
<td>City and County of Denver</td>
<td>Propel Denver Goals for Housing, Business Development, and Neighborhoods are included in the Strategic Plan goals.</td>
</tr>
<tr>
<td>City of Denver Climate Adaptation Plan</td>
<td>City and County of Denver</td>
<td>Goals consider Denver’s natural hazard risk and resiliency efforts.</td>
</tr>
</tbody>
</table>

*Table 2 – Other local / regional / federal planning efforts*
Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

In preparation for the Consolidated Plan, the City and County of Denver consulted with non-profit and for-profit housing developers, community members, advocacy groups, government and industry representatives to discuss barriers to affordable and accessible housing. In addition, the City consulted with representatives of organizations focused on the needs of the elderly, fair housing, childcare and youth services, public housing, transportation, and health services, broadband and resiliency. These agencies were specifically invited and encouraged to participate in the public input process and to share with their clients notices of meetings and hearings as well as the opportunity to provide written comments with their clients. Entities that participated in the public input process are listed in section PR-10 Consultation.

Additionally, prior to the development of the Consolidated Plan, the City and County of Denver was in the process of developing a regional Analysis of Impediments to Fair Housing Choice (AI). Participating jurisdictions included the City of Aurora, the City of Boulder, Boulder County, the City and County of Broomfield, the City and County of Denver, and the City of Longmont. The lead entity is the City and County of Denver. Five housing authorities also participated in the study: Aurora Housing Authority, Boulder Housing Partners, Boulder County Housing Authority, Denver Housing Authority, and Longmont Housing Authority. This process established both jurisdictional-level and regional goals to address the contributing factors that are limiting housing choice, which are included in the draft report. Action items for the City and County of Denver are included in the five-year strategy and one-year action plan.

Narrative (optional):

Please see above.
**PR-15 Citizen Participation**

1. **Summary of citizen participation process/Efforts made to broaden citizen participation**
   Summarize citizen participation process and how it impacted goal-setting

Please see Citizen Participation section appended to the Consolidated Plan. Citizen participation efforts included public meetings/hearings, focus groups, an online survey, key person interviews, and “pop-up” engagement.

**Citizen Participation Outreach**

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public hearings/meetings</td>
<td>Non-targeted/broad community</td>
<td>Four public meetings held in various neighborhoods. 1 prior to public comment period; 3 during public comment. In total 16 people attended the community meetings, including families, stakeholders, residents, and community advocates.</td>
<td>Wide range of comments covering housing and community development needs.</td>
<td>All comments or views received were accepted.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Focus Group</td>
<td>People Experiencing Homelessness</td>
<td>17 people currently experiencing homelessness and accessing services at St. Francis Center</td>
<td>Perspectives on needs related to housing and homelessness services</td>
<td>All comments or views received were accepted.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Key Person Interviews</td>
<td>Community Stakeholders</td>
<td>10 one-on-one interviews with stakeholders</td>
<td>Wide range of comments covering housing and community development needs.</td>
<td>All comments or views received were accepted.</td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
</tr>
<tr>
<td>------------</td>
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<td>---------------------------------</td>
<td>-------------------------------</td>
<td>----------------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>4</td>
<td>Online Survey</td>
<td>Community Stakeholder Groups</td>
<td>292 respondents</td>
<td>A wide range of comments focused on topics relating to household affordability, accessibility, the needs of homeless and very low-income citizens, the dispersion of affordable housing, and barriers to affordable housing were received.</td>
<td>All comments or views received were accepted.</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Citizen Survey for Regional AI</td>
<td>Residents most vulnerable to housing barriers and with disproportionate housing needs</td>
<td>2,039 Denver resident respondents (5,889 respondents regionwide)</td>
<td>Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination.</td>
<td>All comments or views received were accepted.</td>
<td><a href="http://denver-aurora-boulderafh.com/">http://denver-aurora-boulderafh.com/</a></td>
</tr>
<tr>
<td>6</td>
<td>Resident focus groups for Regional AI</td>
<td>Residents most vulnerable to housing barriers and with disproportionate housing needs</td>
<td>350 residents region-wide participated in-depth discussions about their housing challenges. These groups primarily represented immigrants, Spanish speakers, African Americans, families with children, persons with disabilities, LGBTQ residents, and at-risk youth.</td>
<td>Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination.</td>
<td>All comments or views received were accepted.</td>
<td><a href="http://denver-aurora-boulderafh.com/">http://denver-aurora-boulderafh.com/</a></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
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<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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<td>-------------------</td>
</tr>
<tr>
<td>7</td>
<td>Pop-up engagement for regional AI</td>
<td>Residents most vulnerable to housing barriers and with disproportionate housing needs</td>
<td>To round out resident engagement for the AI and ensure that protected classes were represented, the study team visited day labor sites, ethnic food markets, the St. Francis Day Shelter, central libraries, food pantries, and mobile home parks in rural areas to have conversations with residents about their housing challenges and distribute surveys.</td>
<td>Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination.</td>
<td>All comments or views received were accepted.</td>
<td><a href="http://denver-aurora-boulderafh.com/">http://denver-aurora-boulderafh.com/</a></td>
</tr>
<tr>
<td>8</td>
<td>Community Meetings for Regional AI</td>
<td>Residents most vulnerable to housing barriers and with disproportionate housing needs</td>
<td>The Regional AI culminated in two large, interactive, community celebrations and discussions of housing needs, attended by more than 150 residents representing many cultures, traditions, languages, family types, and races and ethnicities. Translations were offered in Spanish, Somali, Pashtun, Burmese, French, and Karen.</td>
<td>Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination.</td>
<td>All comments or views received were accepted.</td>
<td><a href="http://denver-aurora-boulderafh.com/">http://denver-aurora-boulderafh.com/</a></td>
</tr>
<tr>
<td>9</td>
<td>Website</td>
<td>Residents most vulnerable to housing barriers and with disproportionate housing needs</td>
<td>A website was created for the Regional AI to keep residents and stakeholders updated about the process, communicate opportunities to get involved, provide access to the resident survey, and make the draft report available.</td>
<td>The website was available in five languages in addition to English. More than 2,000 residents accessed the website and used the translation features.</td>
<td></td>
<td><a href="http://denver-aurora-boulderafh.com/">http://denver-aurora-boulderafh.com/</a></td>
</tr>
</tbody>
</table>

Table 3 – Citizen Participation Outreach
Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section of the Consolidated Plan examines housing, community, and economic development needs of residents. As required by HUD, the assessment is based on an analysis of “disproportionate needs” tables—discussed below—and informed by resident input and stakeholder consultation. The Needs Assessment section covers the following areas:

- **Housing Needs.** Top housing needs citywide include affordable rental housing (including housing for those transitioning out of homelessness), accessible housing for people with disabilities and ownership opportunities for low- and moderate-income residents who would like to buy homes. Cost burden and severe cost burden are the most common housing problems in the city.

- **Households with disproportionately greater needs.** Low income households and residents belonging to a racial/ethnic minority—particularly non-Asian minorities—are more affected by housing problems than higher income and non-Hispanic white households.

- **Public Housing.** Private housing market factors combined with a lack of federal funding for public housing create extra challenges for housing authorities. The most immediate needs in public housing are affordable senior housing and increased supply of rentals eligible for DHA’s housing choice voucher program. A top concern among current voucher holders is displacement—that their landlord will stop accepting their voucher as a form of payment.

- **People Experiencing Homelessness.** The Denver 2018 Point in Time (PIT) count identified 3,445 persons experiencing homelessness. Almost 20 percent were newly homeless and 29 percent were chronically homeless. Among those counted in the PIT, the following conditions were common: mental health issue (27% of respondents reported a mental illness), currently fleeing domestic violence (7%), and substance abuse (29%).

- **Non-Homeless Special Needs.** Non-homeless special needs populations include households containing persons with a disability, elderly households, large families, female headed households with children, limited English proficient households, and those at risk of homelessness. The needs of each of these individual populations are discussed in section NA-45.

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1 Note that the PIT focuses on sheltered and unsheltered homeless and therefore excludes people experiencing homelessness but currently staying in hotels/motels, doubled up with friends/family, or in other temporary living situations.
- **Non-Housing Community Development Needs.** Non-housing needs for public facilities/infrastructure as well as public services are summarized below. (Note that economic development needs are discussed in the Market Analysis section of the Con Plan; see MA-45):

  - Top needs for public facilities and infrastructure include sidewalks, street lights and drainage, along with parks/community centers and energy efficiency improvements. Affordable transportation was also a key issue among residents and stakeholders—particularly for low income residents and residents with disabilities who are reliant on public transit.

  - Public services needs include support for rental assistance, after school, child care, public safety education, and job training programs as well as healthy access food programs. There is also an identified need for more mental health resources for the general population and for people with disabilities.

  - Supportive services for specific population groups include supports for residents transitioning out of homelessness and supportive services for people with disabilities transitioning out of institutions, and supports that help seniors age in place.
NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The City and County of Denver has continued to experience strong growth. Denver’s population and household growth has been driven by a strong local economy, large inbound migration from other states, and multifamily unit development.

This growth has contributed to rising housing prices and limited affordable supply. The city's lowest income renters have had a harder time finding affordable units.

Cost burden and severe cost burden, for both renter and owner households, are the most common housing problem in Denver. According to 2017 ACS data, 66,161 renter households (47% of all renters) experience cost burden and 30,770 of those (22% of all renters) experience severe cost burden. Among owner households, 25 percent are cost burdened and 9 percent are severely cost burdened.

The HUD-provided tables show cost burden and other housing problems by income level (AMI). Low-income renters, making 30 percent or below AMI, are disproportionately impacted by severe cost burden and substandard housing.

According to the resident survey from the Regional Analysis of Impediments to Fair Housing Choice, Denver residents’ top housing challenges are: increasing rent prices, not being able to afford a down payment to buy a house, and fear that landlords will stop accepting their housing vouchers.

Strategies to afford to pay for housing included: cutting back on eating out or entertainment, cutting back on clothing purchases, going without needed medication/healthcare/dental care, and finding another job or working multiple jobs.

<table>
<thead>
<tr>
<th>Demographics</th>
<th>Base Year: 2000</th>
<th>Most Recent Year: 2017</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>554,636</td>
<td>704,621</td>
<td>27%</td>
</tr>
<tr>
<td>Households</td>
<td>251,435</td>
<td>296,938</td>
<td>18%</td>
</tr>
<tr>
<td>Median Income</td>
<td>$39,500.00</td>
<td>$65,224.00</td>
<td>65%</td>
</tr>
</tbody>
</table>

Table 4 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2017 ACS 1-year estimates (Most Recent Year)

Number of Households Table

<table>
<thead>
<tr>
<th></th>
<th>0-30% HAMFI</th>
<th>&gt;30-50% HAMFI</th>
<th>&gt;50-80% HAMFI</th>
<th>&gt;80-100% HAMFI</th>
<th>&gt;100% HAMFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Households</td>
<td>45,990</td>
<td>33,100</td>
<td>44,515</td>
<td>24,765</td>
<td>117,705</td>
</tr>
<tr>
<td>Small Family Households</td>
<td>11,550</td>
<td>8,560</td>
<td>12,255</td>
<td>7,065</td>
<td>49,145</td>
</tr>
<tr>
<td>Large Family Households</td>
<td>3,630</td>
<td>3,415</td>
<td>3,865</td>
<td>1,575</td>
<td>5,570</td>
</tr>
<tr>
<td>Household contains at least one person 62-74 years of age</td>
<td>6,705</td>
<td>5,390</td>
<td>6,440</td>
<td>3,670</td>
<td>16,765</td>
</tr>
</tbody>
</table>
### Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

<table>
<thead>
<tr>
<th>Condition Description</th>
<th>0-30% HAMFI</th>
<th>&gt;30-50% HAMFI</th>
<th>&gt;50-80% HAMFI</th>
<th>&gt;80-100% HAMFI</th>
<th>&gt;100% HAMFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household contains at least one person age 75 or older</td>
<td>5,065</td>
<td>4,755</td>
<td>4,665</td>
<td>2,000</td>
<td>5,400</td>
</tr>
<tr>
<td>Households with one or more children 6 years old or younger</td>
<td>8,595</td>
<td>5,790</td>
<td>7,115</td>
<td>2,690</td>
<td>11,715</td>
</tr>
</tbody>
</table>

#### Table 5 - Total Households Table

Data Source: 2009-2013 CHAS

#### Table 6 – Housing Problems Table

<table>
<thead>
<tr>
<th>Condition Description</th>
<th>0-30% AMI</th>
<th>&gt;30-50% AMI</th>
<th>&gt;50-80% AMI</th>
<th>&gt;80-100% AMI</th>
<th>&gt;100% AMI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Substandard Housing - Lacking complete plumbing or kitchen facilities</td>
<td>1,160</td>
<td>300</td>
<td>305</td>
<td>145</td>
<td>1,91</td>
</tr>
<tr>
<td>Severely Overcrowded - With &gt;1.51 people per room (and complete kitchen and plumbing)</td>
<td>765</td>
<td>480</td>
<td>440</td>
<td>215</td>
<td>1,90</td>
</tr>
<tr>
<td>Overcrowded - With 1.01-1.5 people per room (and none of the above problems)</td>
<td>1,400</td>
<td>1,295</td>
<td>5</td>
<td>180</td>
<td>3,92</td>
</tr>
<tr>
<td>Housing cost burden greater than 50% of income (and none of the above problems)</td>
<td>20,49</td>
<td>0</td>
<td>6,225</td>
<td>1,43</td>
<td>28,3</td>
</tr>
<tr>
<td>Housing cost burden greater than 30% of income (and none of the above problems)</td>
<td>3,450</td>
<td>10,47</td>
<td>9,14</td>
<td>1,82</td>
<td>24,8</td>
</tr>
<tr>
<td>Zero/negative Income (and none of the above problems)</td>
<td>3,695</td>
<td>0</td>
<td>0</td>
<td>3,69</td>
<td>1,00</td>
</tr>
</tbody>
</table>

Data Source: 2009-2013 CHAS
2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30%</td>
<td>&gt;30-50%</td>
</tr>
<tr>
<td><strong>NUMBER OF HOUSEHOLDS</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Having 1 or more of four housing problems</td>
<td>29,530</td>
<td>18,940</td>
</tr>
<tr>
<td>Having none of four housing problems</td>
<td>5,915</td>
<td>4,025</td>
</tr>
<tr>
<td>Household has negative income, but none of the other housing problems</td>
<td>3,065</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 7 – Housing Problems 2

Data: 2011-2015 CHAS

Source:

3. Cost Burden > 30%

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30%</td>
<td>&gt;30-50%</td>
</tr>
<tr>
<td><strong>NUMBER OF HOUSEHOLDS</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Small Related</td>
<td>7,665</td>
<td>5,050</td>
</tr>
<tr>
<td>Large Related</td>
<td>2,515</td>
<td>1,520</td>
</tr>
<tr>
<td>Elderly</td>
<td>3,865</td>
<td>2,890</td>
</tr>
<tr>
<td>Other</td>
<td>12,740</td>
<td>8,580</td>
</tr>
<tr>
<td>Total need by income</td>
<td>26,785</td>
<td>18,040</td>
</tr>
</tbody>
</table>

Table 8 – Cost Burden > 30%

Data: 2009-2013 CHAS

Source:
4. Cost Burden > 50%

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
</tr>
<tr>
<td>Number of Households</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Small Related</td>
<td>6,470</td>
<td>1,455</td>
</tr>
<tr>
<td>Large Related</td>
<td>2,125</td>
<td>415</td>
</tr>
<tr>
<td>Elderly</td>
<td>2,715</td>
<td>1,075</td>
</tr>
<tr>
<td>Other</td>
<td>11,410</td>
<td>3,520</td>
</tr>
<tr>
<td>Total need by income</td>
<td>22,720</td>
<td>6,465</td>
</tr>
</tbody>
</table>

Table 9 – Cost Burden > 50%

Source: 2009-2013 CHAS

5. Crowding (More than one person per room)

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
</tr>
<tr>
<td>Number of Households</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single family households</td>
<td>1,925</td>
<td>1,275</td>
</tr>
<tr>
<td>Multiple, unrelated family households</td>
<td>190</td>
<td>385</td>
</tr>
<tr>
<td>Other, non-family households</td>
<td>80</td>
<td>155</td>
</tr>
<tr>
<td>Total need by income</td>
<td>2,195</td>
<td>1,815</td>
</tr>
</tbody>
</table>

Table 10 – Crowding Information – 1/2

Source: 2009-2013 CHAS

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
</tr>
<tr>
<td>Households with Children Present</td>
<td>36%</td>
<td>17%</td>
</tr>
</tbody>
</table>

Table 11 – Crowding Information – 2/2

Data Source: 2017 Denver-Aurora-Boulder Assessment of Fair Housing Resident Survey
Note: Data were not available through CHAS or ACS; therefore, data represent a sample of the population gathered through a non-probability survey.
Describe the number and type of single person households in need of housing assistance.

There are 110,461 single person households in Denver, 11 percent or 12,159 households of which experience housing needs. In the next 5 years, single person households in need of housing assistance is projected to grow to 12,957 households.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Households with disabilities. Eleven percent of persons in Denver have one or more disabilities, like the state overall (10.9%) and slightly higher than the Denver Metro (9.6%). Of seniors, 36 percent has some type of disability. CHAS data indicate that about 46 percent of all residents with a disability has 1 or more housing problem (e.g., cost burden, overcrowding, substandard housing). In other words, among the 49,610 residents with a disability in Denver, 22,944 have some type of housing need.

Findings from the AI survey indicate that 28 percent of households regionally that include a member with a disability are living in housing that does not meet that member’s accessibility needs. In addition, persons with disabilities are typically more vulnerable to housing discrimination due to housing providers’ lack of knowledge about reasonable accommodation provisions in fair housing laws. Persons with disabilities also face challenges finding housing that is affordable, accessible, and located near transit and supportive services.

Victims of domestic violence. National incidence rates indicate that 37 percent of women and 34 percent of men aged 18 or older have experienced contact sexual violence, physical violence, or stalking by an intimate partner in their lifetime. Annual incidence rates—meaning the proportion of people who have experienced contact sexual violence, physical violence, or stalking by an intimate partner in the previous year—are 5.5 percent for women and 5.2 percent for men.

Applying these rates to the Denver population of women and men over 18 indicates that 30,199 residents are likely to have experienced some time of domestic violence, dating violence, sexual assault and/or stalking by an intimate partner in the previous year. National statistics show that 3.6 percent of women and 1.0 percent of men experiencing intimate partner violence are in need of housing services. In Denver, these statistics suggest that 707 victims of domestic violence, or 2 percent, require housing services each year.

Although the supportive and housing services needed by intimate partner violence (IPV) victims vary, generally, all need health care and counseling immediately following the event and continued mental health support to assist with the traumatic stress disorder related to the event. Victims may also require assistance with substance abuse and mental health services, both of which are common among IPV victims. Affordable housing is also critical: The National Alliance to End Homelessness argues that a “strong investment in housing is crucial [to victims of domestic violence] ...so that the family or woman is able to leave the shelter system as quickly as possible without returning to the abuse.” The Alliance also reports that studies on homelessness have shown a correlation between domestic violence and homelessness (http://www.endhomelessness.org/pages/domestic_violence).
What are the most common housing problems?

Cost burden and severe cost burden, for both renter and owner households, are the most common housing problem in Denver. Table 7 shows that 24,895 renter households earning less than 100 percent of AMI experience cost burden and 28,360 renter households earning less than 100 percent of AMI experience severe cost burden. This compares to 1,910 renters below 100 percent of AMI living in substandard housing and 5,820 renters below 100 percent of AMI living in overcrowded or severely overcrowded homes. Similar trends are evident among owner households.

Are any populations/household types more affected than others by these problems?

“Small related” renter, “other” renter (“other” may include singles, roommates, people living in group homes, etc.), and “elderly” owner households are the most affected by cost burden. Table 9 shows 15,700 small related renter households, 27,455 other renter households, and 7,600 elderly owner households are cost burdened, which combined make up 65 percent of all households that are cost burdened.

Extremely low-income renters, making 30 percent of AMI or less, are disproportionately impacted by severe cost burden across every household type and “small-related” low-income owners, making between 50 and 80 percent of AMI, are disproportionately impacted by cost burden.

Overall, renters are more likely than owners to experience housing problems. According to Table 8, 65 percent of renters earning less than 100 percent AMI have at least one housing problem compared to 51 percent of owners earning less than 100 percent of AMI.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

Households spending 50 percent or more of their income on housing are considered at risk of homelessness. These households have limited capacity to adjust to rising home prices and are vulnerable to even minor shifts in rents, property taxes, and/or incomes. CHAS data in Table 7 indicate that 41,600 Denver Households (28,360 renters and 13,240 owners) are severely cost burdened, spending 50 percent or more of their income on housing. More recent ACS data indicate that 43,857 Denver households (15% of all households) are severely cost burdened and therefore at risk of homelessness.

According to the ACS, 17 percent of children in Denver live in poverty. Children make up more than a quarter (28%) of Denver’s residents living in poverty. Denver Public Schools estimates that about 2,000 students are homeless.
In recent years, The City has more than doubled investments into Rapid Rehousing, both through ESG programs, and through tax-funded programs via DRH. The city’s central intake coordinated assessment system prioritizes individuals or families with moderate health, mental health and/or behavioral health issues, but who are likely to be able to achieve housing stability over a short time period through a medium or short-term rent subsidy and access to support services for rapid rehousing assistance.

One notable need among rapid rehousing recipients nearing termination is specific to those who are not exiting successfully. At termination, those who are not exiting successfully should be transitioned into permanently supportive housing; however, there is currently not an efficient mechanism within the system network to facilitate that transition smoothly.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

Households spending 50 percent or more of their income on housing are considered at risk of homelessness.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Housing costs rising more rapidly than wages, job loss or hours being cut back, and housing condition deterioration. Households/individuals who have skipped a housing payment or sought additional employment to pay expenses and/or have sacrificed basic needs to pay their housing costs are also at an increased risk. Households that have experienced foreclosures are another measure of the proportion of residents at risk of homelessness.

**Discussion**

In addition to the topics discussed above, the City of Denver evaluated broadband needs of low- and moderate-income households. Citywide, 81 percent of households have a desktop or laptop computer and 87 percent have a smartphone. Seventy six percent of households have broadband access by cable, fiber, or DSL and 87 percent have some type of broadband access.

However, ACS data indicate that access is much lower for low and moderate income households. In Denver just 6 percent of households earning $75,000 or more per year are without an internet subscription compared to 44 percent of households earning less than $20,000 per year and 21 percent of households earning between $20,000 and $75,000 per year.

As part of the stakeholder engagement process conducted for the Consolidated Plan, stakeholders serving low income households were specifically asked about their perception of broadband needs and digital inclusion. Several stakeholders mentioned that they were not aware of the work being done to address digital inclusion in the Denver; however, they felt that there is a need for additional efforts toward greater digital inclusion. One stakeholder suggested that the City should form a committee that
includes City staff, nonprofit stakeholders, and residents to assess equitable access to broadband internet and other aspects of digital inclusion. There is an impression that digital infrastructure is fairly consistent throughout the City but that, in general, digital access and inclusion in Denver is lagging behind other cities of a similar size.

Stakeholders also emphasize that access does not mean literacy and that additional digital literacy classes and trainings and access to community computer labs and hardware check-out options would be impactful for many low-income residents, including youth and those seeking to improve their job readiness. There is a strong existing network of organizations within Denver that are working on these issues but they would certainly benefit from additional collaboration, support, and funding from the City.

A broadband provider interviewed discussed the efficiency in providing broadband access on a per-development basis (as opposed to a per household model). Many market-rate multifamily developments are offering this service and extending that service to LIHTC or other affordable developments could help increase access for low and moderate income populations. Some type of financial incentive/subsidy would likely be necessary to help cover the up-front infrastructure costs. Some states have formalized this process by requiring it in the Qualified Allocation Plan for LIHTC.
NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

This section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. Housing problems include:

- Lack of complete kitchen facilities.
- Lack of complete plumbing facilities.
- Overcrowded households with more than 1 person per room, not including bathrooms, porches, foyers, halls, or half-rooms.
- Households with cost burdens of more than 50 percent of income.

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at a particular income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60 percent of all low-income households within a jurisdiction have a housing problem and 72 percent of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need.

Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need.

0%-30% of Area Median Income

<table>
<thead>
<tr>
<th>Housing Problems</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>37,125</td>
<td>7,720</td>
<td>4,390</td>
</tr>
<tr>
<td>White</td>
<td>16,095</td>
<td>3,635</td>
<td>2,240</td>
</tr>
<tr>
<td>Black / African American</td>
<td>6,355</td>
<td>1,150</td>
<td>815</td>
</tr>
<tr>
<td>Asian</td>
<td>1,095</td>
<td>345</td>
<td>200</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>275</td>
<td>65</td>
<td>20</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>10</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>Hispanic</td>
<td>12,500</td>
<td>2,350</td>
<td>920</td>
</tr>
</tbody>
</table>

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%
### 30%-50% of Area Median Income

<table>
<thead>
<tr>
<th>Housing Problems</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>25,385</td>
<td>9,265</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>12,710</td>
<td>5,115</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>3,355</td>
<td>1,035</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>535</td>
<td>350</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>90</td>
<td>80</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>8,350</td>
<td>2,510</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

<table>
<thead>
<tr>
<th>Housing Problems</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>21,105</td>
<td>24,175</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>11,990</td>
<td>14,665</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>1,550</td>
<td>2,035</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>800</td>
<td>665</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>175</td>
<td>315</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>70</td>
<td>110</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>6,125</td>
<td>5,880</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%
80%-100% of Area Median Income

<table>
<thead>
<tr>
<th>Housing Problems</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>7,800</td>
<td>17,385</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>4,975</td>
<td>11,675</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>760</td>
<td>1,400</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>110</td>
<td>385</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>45</td>
<td>15</td>
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</tr>
<tr>
<td>Pacific Islander</td>
<td>10</td>
<td>20</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,755</td>
<td>3,625</td>
<td>0</td>
</tr>
</tbody>
</table>

|                                                                 |                                                        |                                                        |                                                        |
| Table 15 - Disproportionally Greater Need 80 - 100% AMI         |                                                        |                                                        |                                                        |

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion
This section discusses the income categories in which a racial or ethnic group has a disproportionately greater need.

0-30% AMI. All groups have relatively high rates of housing problems, but no single group experiences a disproportionately high rate of need relative to the jurisdiction as a whole (apart from Pacific Islander households, who experience slightly disproportionate housing needs, but the total number of households is too low to accurately assess disproportionate needs). At this income level, 83 percent of all households have at least one of the four housing problems.

30-50% AMI. Similar to the 0-30% AMI income level, all households in this income group have high rates of housing needs. In the jurisdiction overall, 73 percent of households have at least one housing problem. There are no racial/ethnic groups with a disproportionately high need.

50-80% AMI. At this income level, 47 percent of households in the jurisdiction overall have at least one of the four housing problems. No single racial/ethnic group experiences a disproportionately high rate of need relative to the jurisdiction as a whole at this income level.

80-100% AMI. Less than one third of all households earning 80-100% AMI in the jurisdiction have one or more of the four housing problems. Disproportionately high housing needs are experienced by American Indian/Alaska Native (75%) households.
NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section discusses severe housing needs as defined by HUD, using HUD-prepared housing needs data. The tables show the number of Denver households that have severe housing needs by income, race, and ethnicity. Needs are defined as one or more of the following housing problems: 1. Housing lacks complete kitchen facilities, 2. Housing lacks complete plumbing facilities, 3. Household has more than 1.5 persons per room, 4. Household cost burden exceeds 50 percent.

0%-30% of Area Median Income

<table>
<thead>
<tr>
<th>Severe Housing Problems*</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>30,780</td>
<td>14,060</td>
<td>4,390</td>
</tr>
<tr>
<td>White</td>
<td>13,360</td>
<td>6,370</td>
<td>2,240</td>
</tr>
<tr>
<td>Black / African American</td>
<td>5,220</td>
<td>2,290</td>
<td>815</td>
</tr>
<tr>
<td>Asian</td>
<td>995</td>
<td>445</td>
<td>200</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>180</td>
<td>160</td>
<td>20</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Hispanic</td>
<td>10,325</td>
<td>4,530</td>
<td>920</td>
</tr>
</tbody>
</table>

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

<table>
<thead>
<tr>
<th>Severe Housing Problems*</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>12,100</td>
<td>22,555</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>5,935</td>
<td>11,890</td>
<td>0</td>
</tr>
</tbody>
</table>
### Severe Housing Problems*  

<table>
<thead>
<tr>
<th>Jurisdiction as a whole</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Black / African American</strong></td>
<td>1,640</td>
<td>2,750</td>
<td>0</td>
</tr>
<tr>
<td><strong>Asian</strong></td>
<td>265</td>
<td>620</td>
<td>0</td>
</tr>
<tr>
<td><strong>American Indian, Alaska Native</strong></td>
<td>50</td>
<td>120</td>
<td>0</td>
</tr>
<tr>
<td><strong>Pacific Islander</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Hispanic</strong></td>
<td>4,005</td>
<td>6,855</td>
<td>0</td>
</tr>
</tbody>
</table>

**Table 17 – Severe Housing Problems 30 - 50% AMI**  

*The four severe housing problems are:  
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%*  

### 50%-80% of Area Median Income  

<table>
<thead>
<tr>
<th>Jurisdiction as a whole</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Jurisdiction as a whole</strong></td>
<td>6,780</td>
<td>38,500</td>
<td>0</td>
</tr>
<tr>
<td><strong>White</strong></td>
<td>3,320</td>
<td>23,330</td>
<td>0</td>
</tr>
<tr>
<td><strong>Black / African American</strong></td>
<td>485</td>
<td>3,095</td>
<td>0</td>
</tr>
<tr>
<td><strong>Asian</strong></td>
<td>290</td>
<td>1,175</td>
<td>0</td>
</tr>
<tr>
<td><strong>American Indian, Alaska Native</strong></td>
<td>50</td>
<td>435</td>
<td>0</td>
</tr>
<tr>
<td><strong>Pacific Islander</strong></td>
<td>70</td>
<td>110</td>
<td>0</td>
</tr>
<tr>
<td><strong>Hispanic</strong></td>
<td>2,450</td>
<td>9,560</td>
<td>0</td>
</tr>
</tbody>
</table>

**Table 18 – Severe Housing Problems 50 - 80% AMI**  

*The four severe housing problems are:  
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%*
Table 19 – Severe Housing Problems 80 - 100% AMI

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

This section discusses the income categories in which a racial or ethnic group has a disproportionately greater severe housing need.

0-30% AMI. Like the previous discussion on housing needs, all groups have relatively high rates of severe housing problems, but no single group experiences a disproportionately high rate of need relative to the jurisdiction as a whole. At this income level, almost 70 percent of all households have a severe housing problem.

30-50% AMI. Thirty-five percent of all households earning 30-50% of AMI in the jurisdiction have a severe housing need. No single racial/ethnic group experiences a disproportionately high rate of need relative to the jurisdiction as a whole at this income level.

50-80% AMI. At this income level, 15 percent of households in the jurisdiction overall have a severe housing problem. Disproportionately high housing needs are experienced by American Indian/Alaska Native households, 39 percent of which have a severe housing need.

80-100% AMI. Eight percent of all households earning 80-100% AMI in the jurisdiction have a severe housing problem. These data indicate that American Indian/Alaska Native households at this income level experience severe housing problems at a disproportionately high rate (25% of households).
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

According to HUD, disproportionate need occurs when a household category has a level of need that is at least 10 percentage points higher than the level of need of all households in a particular income category. For example, if 60 percent of households earning between 50 and 80 percent of the area median income (AMI) have a housing problem, and 75 percent of Hispanics in the same income category have a housing problem, Hispanics would have a disproportionate need.

Introduction:

This section provides data on households with disproportionate levels of housing cost burden. Housing cost burden occurs when households pay more than 30 percent of their gross household income toward housing costs, which includes utilities. Severe housing cost burden occurs when housing costs are 50 percent or more of gross household income.

Housing Cost Burden

<table>
<thead>
<tr>
<th>Housing Cost Burden</th>
<th>&lt;=30%</th>
<th>30-50%</th>
<th>&gt;50%</th>
<th>No / negative income (not computed)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>160,965</td>
<td>50,055</td>
<td>46,210</td>
<td>4,615</td>
</tr>
<tr>
<td>White</td>
<td>111,465</td>
<td>28,530</td>
<td>23,645</td>
<td>2,260</td>
</tr>
<tr>
<td>Black / African American</td>
<td>11,720</td>
<td>5,490</td>
<td>6,780</td>
<td>955</td>
</tr>
<tr>
<td>Asian</td>
<td>5,105</td>
<td>1,240</td>
<td>1,280</td>
<td>200</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>910</td>
<td>335</td>
<td>230</td>
<td>20</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>180</td>
<td>90</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Hispanic</td>
<td>28,825</td>
<td>13,705</td>
<td>13,310</td>
<td>975</td>
</tr>
</tbody>
</table>

Table 20 – Greater Need: Housing Cost Burdens AMI

Data Source: 2009-2013 CHAS

Discussion:

Table 21 (above) shows housing cost burden by race/ethnicity of householders regardless of income.

Households facing housing cost burden disproportionate to all Denver households are seen in the following populations and rates:

- Pacific Islander households disproportionately experienced cost burden by a rate of 13 percentage points
- Black and African American households disproportionately experienced severe cost burden by a rate of 10 percentage points
NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

As discussed above, disproportionately high needs exist for the following groups:

- Pacific Islander households earning 50-80% AMI; and
- American Indian/Alaska Native households earning 80-100% AMI.

Differences in housing needs by race and ethnicity can also be assessed by differences in homeownership, access to publicly-assisted housing, and the experience finding housing. As discussed in the region’s AI, homeownership rates for African American and Hispanic residents are substantially lower than for non-Hispanic white and Asian residents.

If they have needs not identified above, what are those needs?

The Regional AI also identified displacement—having to move when a resident did not want to move—as a key housing need in Denver. Half of Denver renters who are precariously housed have been displaced.

Residents participating in the focus groups were asked if the housing needs they described were more prevalent for certain racial and ethnic groups. Some Spanish Speaking residents, and residents with children, felt they were more likely than others to be treated poorly by landlords or to face housing discrimination. Most focus group attendees agreed that low income people are equally challenged by Denver’s housing crisis. The exception is persons with disabilities who need both accessible and affordable housing—the supply of which is basically nonexistent. These residents have significantly disproportionately high needs if they are not living in publicly-subsidized housing.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Maps of the distribution of residents by race/ethnicity were prepared for the Regional AI in 2017/2018. These maps showed no concentrations of Pacific Islander or American Indian/Alaska Native residents. However, there were several Census tracts—primarily in the western and northern parts of the City—with concentrations of Hispanic and Black/African American residents. The dissimilarity index (a common measure for segregation) shows “high” levels of segregation for Hispanic and Black/African American residents.

The Regional AI provides extensive detail on areas of concentration—both racial/ethnic concentration and areas of poverty concentration—along with strategies to address racial, ethnic and economic segregation in the region. Those goals from the AI are also included in this Consolidated Plan.
NA-35 Public Housing – 91.205(b)

Introduction

Denver is served by one housing authority, the Housing Authority of the City and County of Denver (DHA). DHA is considered high performing by HUD.

In the Regional AI’s resident survey, more than half (56%) of participants who have a housing voucher felt that it was very difficult to find a landlord that would accept a voucher—citing not enough properties were available or vouchers were not enough to cover the rent for the places they wanted to live.

Private housing market factors combined with a lack of federal funding for public housing create extra challenges for housing authorities. The data tables below show the current inventory of federally funded housing in Denver and the populations served.

Totals in Use

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing Vouchers</th>
<th>Total</th>
<th>Project-based</th>
<th>Tenant-based</th>
<th>Special Purpose Voucher</th>
<th>Disabled</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Veterans Affairs</td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Supportive Housing</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Family Unification Program</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Disabled</td>
<td></td>
</tr>
<tr>
<td># of units</td>
<td>0</td>
<td>132</td>
<td>3,716</td>
<td>5,655</td>
<td>695</td>
<td>4,960</td>
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<tr>
<td>vouchers in</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
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<td>use</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 21 - Public Housing by Program Type
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center), Denver Housing Authority (DHA)

Characteristics of Residents

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
<th>Average Annual Income</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Consolidated Plan

DENVER

OMB Control No: 2506-0117 (exp. 06/30/2018)
### Program Type

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers Total</th>
<th>Project-based</th>
<th>Tenant-based</th>
<th>Special Purpose Voucher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Veterans Affairs Supportive Housing</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Family Unification Program</td>
</tr>
<tr>
<td>Average length of stay</td>
<td>0</td>
<td>7</td>
<td>9</td>
<td>10</td>
<td>3</td>
<td>11</td>
</tr>
<tr>
<td>Average Household size</td>
<td>0</td>
<td>2</td>
<td>2</td>
<td>3</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td># Homeless at admission</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td># of Elderly Program Participants (&gt;62)</td>
<td>0</td>
<td>55</td>
<td>1,216</td>
<td>1,207</td>
<td>178</td>
<td>1,029</td>
</tr>
<tr>
<td># of Disabled Families</td>
<td>0</td>
<td>58</td>
<td>1,598</td>
<td>2,180</td>
<td>349</td>
<td>1,831</td>
</tr>
<tr>
<td># of Families requesting accessibility features</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td># of HIV/AIDS program participants</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td># of DV victims</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**Table 22 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center), Denver Housing Authority (DHA)

### Race of Residents

<table>
<thead>
<tr>
<th>Race</th>
<th>Certificate Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers Total</th>
<th>Project-based</th>
<th>Tenant-based</th>
<th>Special Purpose Voucher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Veterans Affairs Supportive Housing</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Family Unification Program</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Disabled (*)</td>
</tr>
<tr>
<td>White</td>
<td>0</td>
<td>104</td>
<td>2,131</td>
<td>2,641</td>
<td>353</td>
<td>2,288</td>
</tr>
<tr>
<td>Black/African American</td>
<td>0</td>
<td>21</td>
<td>1,326</td>
<td>2,807</td>
<td>289</td>
<td>2,518</td>
</tr>
</tbody>
</table>

Consolidated Plan

DENVER 34

OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
<th>Tenant-based</th>
<th>Special Purpose Voucher</th>
<th>Disabled *</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Total</td>
<td>Project-based</td>
<td>Veterans Affairs Supportive Housing</td>
<td>Family Unification Program</td>
</tr>
<tr>
<td>Race</td>
<td>Certificate</td>
<td>Mod-Rehab</td>
<td>Public Housing</td>
<td>Vouchers</td>
<td>Tenant-based</td>
<td>Special Purpose Voucher</td>
<td>Disabled *</td>
</tr>
<tr>
<td>Asian</td>
<td>0</td>
<td>3</td>
<td>187</td>
<td>83</td>
<td>19</td>
<td>64</td>
<td>1</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>0</td>
<td>4</td>
<td>47</td>
<td>113</td>
<td>32</td>
<td>81</td>
<td>5</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>25</td>
<td>11</td>
<td>2</td>
<td>9</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 23 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center), Denver Housing Authority (DHA)

Ethnicity of Residents

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
<th>Tenant-based</th>
<th>Special Purpose Voucher</th>
<th>Disabled *</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Total</td>
<td>Project-based</td>
<td>Veterans Affairs Supportive Housing</td>
<td>Family Unification Program</td>
</tr>
<tr>
<td>Ethnicity</td>
<td>Certificate</td>
<td>Mod-Rehab</td>
<td>Public Housing</td>
<td>Vouchers</td>
<td>Tenant-based</td>
<td>Special Purpose Voucher</td>
<td>Disabled *</td>
</tr>
<tr>
<td>Hispanic</td>
<td>0</td>
<td>45</td>
<td>1,644</td>
<td>1,574</td>
<td>154</td>
<td>1,420</td>
<td>32</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>0</td>
<td>87</td>
<td>2,072</td>
<td>4,081</td>
<td>541</td>
<td>3,540</td>
<td>253</td>
</tr>
</tbody>
</table>

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 24 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center), Denver Housing Authority (DHA)
Section 504 Needs Assessment

Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

As of October 2018, 50 elderly applicants age 62 or older and 28 non-elderly disabled applicants were on the DHA waiting list for accessible units. One-bedroom units are the highest demanded unit among these populations—92 percent of elderly applicants and 68 percent of non-elderly disabled applicants request one-bedroom units.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Public Housing immediate needs affordable senior housing, including but not limited to independent living affordable housing as Denver population is aging.

Housing Choice Voucher holders immediate needs are for the private sector and housing providers to sign-up and make their units/homes eligible for DHA HCV program, and accept HCV, and rents at the Denver/local FRM.

How do these needs compare to the housing needs of the population at large

Affordable housing is a prevalent issue for the City and County of Denver and the needs of housing authority residents are further exasperated due to lack of financial resources, loss of employment, illness, etc., to pay rents (i.e., priced at less than $500/month to serve the city's lowest income renters) in a tight economy of which Denver and the nation is undergoing.

Additionally, the need for affordable senior housing is also comparable to the housing needs of the population at large as the baby boomers and increase in the senior/elderly population.

Discussion

Please see above.
**NA-40 Homeless Needs Assessment – 91.205(c)**

**Introduction:**

This section of the Consolidated Plan provides data on persons and families who are homeless in Denver. The data below are from the 2018 Metro Denver Homeless Initiative Point in Time (PIT) count.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

In the City and County of Denver, in January 2018, the PIT count identified 3,445 persons experiencing homelessness.

Almost 20 percent (661 individuals) are newly homeless, defined as experiencing homelessness for less than one year and first episode of homelessness. About 29 percent were chronically homeless.

Over 20 percent of respondents identified as family households (with at least one adult and one child under 18 years old), 12 percent were Veterans, and 5 percent were unaccompanied or transition age youth.

Among those experiencing homelessness, the following conditions were common: mental health issue (27% of respondents reported a mental illness), currently fleeing domestic violence (7%), and substance abuse (29%). Just one percent reported having HIV/AIDS.

**Nature and Extent of Homelessness:**

<table>
<thead>
<tr>
<th>Race:</th>
<th>Unsheltered</th>
<th>Sheltered</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>351</td>
<td>1,510</td>
</tr>
<tr>
<td>Black or African American</td>
<td>97</td>
<td>657</td>
</tr>
<tr>
<td>Asian</td>
<td>5</td>
<td>12</td>
</tr>
<tr>
<td>American Indian or Alaska</td>
<td>36</td>
<td>118</td>
</tr>
<tr>
<td>Native</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>6</td>
<td>32</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ethnicity:</th>
<th>Unsheltered</th>
<th>Sheltered</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hispanic</td>
<td>134</td>
<td>633</td>
</tr>
<tr>
<td>Non-Hispanic</td>
<td>460</td>
<td>2,147</td>
</tr>
</tbody>
</table>

Source: DHS and PIT 2018.
## Estimate the # of persons experiencing homelessness on a given night

<table>
<thead>
<tr>
<th>Description</th>
<th>Sheltered</th>
<th>Unsheltered</th>
</tr>
</thead>
<tbody>
<tr>
<td>Persons in Households with Adult(s) and Child(ren)</td>
<td>700</td>
<td>10</td>
</tr>
<tr>
<td>Persons in Households with Only Children</td>
<td>109</td>
<td>68</td>
</tr>
<tr>
<td>Persons in Households with Only Adults</td>
<td>2,113</td>
<td>597</td>
</tr>
<tr>
<td>Chronically Homeless Individuals</td>
<td>613</td>
<td>362</td>
</tr>
<tr>
<td>Chronically Homeless Families</td>
<td>14</td>
<td>2</td>
</tr>
<tr>
<td>Veterans</td>
<td>352</td>
<td>75</td>
</tr>
<tr>
<td>Unaccompanied Child</td>
<td>108</td>
<td>69</td>
</tr>
<tr>
<td>Persons with HIV</td>
<td>24</td>
<td>8</td>
</tr>
</tbody>
</table>

Source: DHS and PIT 2018.

### Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the 2018 Homeless Point in Time Study information for Denver indicates:

- **Families with Children**: 710 total persons – 22 percent are living in an emergency shelter, 77 percent are living in transitional housing, and 1 percent are unsheltered.

- **Veterans**: 427 total persons – 60 percent are living in an emergency shelter, 22 percent are living in transitional housing, and 18 percent are unsheltered.

Non-Hispanic white is the largest racial and ethnic category of households experiencing homelessness (76% of respondent households). African Americans (754) and persons of Hispanic descent (767) also make up a significant portion of the homeless population in Denver. Compared to the demographics of the city overall, African Americans are disproportionately likely to be homeless. Hispanics make up a smaller proportion of the homeless population in Denver than their overall proportion of Denver residents.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the 2018 Point in Time Study, there were 5,317 homeless men, women and children in metro Denver on Monday night, January 29, 2018. Sixty-five percent (3,445 individuals) spent the night in the City and County of Denver.

Eighteen percent of persons experiencing homelessness in Denver (609 individuals) spent the night unsheltered (on the street, under a bridge, in a car, etc). The number and proportion of unsheltered persons increased over the last two years—from 12.4 percent in 2016 percent to 17.7 percent today.

Of the unsheltered homeless individuals in Denver, 597 (98%) were households without children, 10 (2%) were families with children, and only 2 were unaccompanied youth.

Approximately 29 percent of Denver’s homeless are chronically homeless, defined as persons having a chronic debilitating condition, sleeping in a place not meant for human habitation and/or in an emergency homeless shelter and having been homeless continually for one year or more or having four or more episodes of homelessness in three or more years.

Discussion:

Please see above.
NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

This section provides data and information about special needs populations in Denver, with a focus on individuals with HIV/AIDS. Non-homeless special needs populations include households containing persons with a disability (hearing/vision limitation, ambulatory limitation, cognitive limitation or self-care/independent living limitation), elderly households, large families, female headed households with children, limited English proficient households, and those at risk of homelessness. The characteristics of these populations are described below.

Data in the first two tables are provided by HUD (prepopulated); the remainder of the section uses a customized model to estimate the population, characteristics, and needs of non-homeless special populations in Denver. The Regional AI, which is appended to this section and discusses the findings from stakeholder consultation and the resident survey, supplements this section.

HOPWA

The following statistics reflect data for the entire Denver metro area. Data are not available at the city/county level.

<table>
<thead>
<tr>
<th>Current HOPWA formula use:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative cases of AIDS reported</td>
<td>8,726</td>
</tr>
<tr>
<td>Area incidence of AIDS</td>
<td>124</td>
</tr>
<tr>
<td>Rate per population</td>
<td>4.3</td>
</tr>
<tr>
<td>Number of new cases prior year (3 years of data)</td>
<td>N/A</td>
</tr>
<tr>
<td>Rate per population (3 years of data)</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Current HIV surveillance data:

| Number of Persons living with HIV (PLWH)                | 8,831    |
| Area Prevalence (PLWH per population)                   | 0.31%    |
| Number of new HIV cases reported last year              | 303      |

| Data Source: CDC HIV Surveillance |

<table>
<thead>
<tr>
<th>HIV Housing Need (HOPWA Grantees Only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of HOPWA Assistance</td>
</tr>
<tr>
<td>Tenant based rental assistance</td>
</tr>
<tr>
<td>Short-term Rent, Mortgage, and Utility</td>
</tr>
<tr>
<td>Facility Based Housing (Permanent, short-term or transitional)</td>
</tr>
</tbody>
</table>

| Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet |
Describe the characteristics of special needs populations in your community. What are the housing and supportive service needs of these populations and how are these needs determined?

Housing and supportive service needs for Denver’s non-homeless special needs populations are described below. Needs were determined either through occurrence of HUD-defined housing problems, income/employment status, and stakeholder and resident engagement.

- **Disability.** There are 49,610 households containing a person with a disability in Denver. About 22,540 households include a person with a hearing or vision impairment, 26,665 include a person with an ambulatory limitation, 19,140 include a person with a cognitive limitation, and 21,885 include a person with a self-care or independent living limitation (note there is overlap in the specific types of disabilities as some people/households have more than one limitation).

Overall, 46 percent of households that contain a member with a disability have one or more housing problems. By that measure, 22,944 households containing a person with a disability have some type of housing need. As discussed in the Regional AI, the top housing challenges for people with disabilities include: worrying about increasing rent or eviction if accommodation requests are made, difficulty getting around the neighborhood because of broken sides/no sidewalks/poor street lighting, and landlords refusing to make an accommodation.

- **Elderly households.** In Denver, 60,855 households include at least one person 62 years or older, accounting for 20 percent of all households. Of those, 26 percent (15,700 households) have some type of housing need. Senior households may be less able to cope with increasing housing costs (rents for renters and property taxes for owners) as they are more likely to be living on a fixed retirement income. Most seniors desire to age in place but may need accessibility modifications as they age and may need additional support services in order to properly maintain their home and property. Many may also require transportation services and in-home health care at certain stages.

- **Large families.** There are 18,055 large family households in Denver. CHAS data indicate that 41 percent of these households have some type of housing problem. The most common housing need is related to cost burden but large households are also more susceptible to overcrowding (CHAS data do not provide enough detail to quantify the number of large family households that are overcrowded).

- **Female headed households with children.** There are about 26,575 female headed households with children in Denver. The poverty rate for these households is 25 percent—much higher than the citywide poverty rate of 14 percent. The 6,768 female headed households with children living in poverty are the most likely to struggle with rising housing costs and may need unique supports given the challenges they face.

- **Limited English proficient households.** Nearly 14,000 Denver households have limited English proficiency (LEP), meaning they speak English less than very well. The most common languages
spoken by LEP households are Spanish (70% of all LEP households), Other Indo-European languages (6%), and Other Asian and Pacific Island languages (5%). These households may have trouble accessing resources and/or housing-related documents in their native language. The 19 percent of limited English proficient households that are living in poverty are most likely to have acute housing needs.

- **At risk of homelessness.** Households spending 50 percent or more of their income on housing are considered at risk of homelessness. These households have limited capacity to adjust to rising home prices and are vulnerable to even minor shifts in rents, property taxes, and/or incomes. In Denver, 41,600 households (14% of all households) are severely cost burdened and therefore at risk of homelessness.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The CDC estimates that 0.31 percent of the Denver metro area population were living with HIV/AIDS in 2016. Based on this estimate, there are approximately 2,215 PLWHA in the City and County of Denver. National estimates from the National Aids Housing Coalition report that approximately 13 percent of PLWHA are in need of housing assistance and 57% have an annual income below $10,000. Challenges to housing for those with HIV/AIDS include employment/income, rental history, criminal history, and co-occurring circumstances. It is difficult for people with HIV/AIDS to retain employment due to the effects on their health and the side effects of drug treatment therapies. Many have mental health issues/substance abuse issues as well. The two primary housing resources for PLWHA are Housing Opportunities for Persons With AIDS (HOPWA) which provides long-term, permanent, stable housing and the Ryan White HIV/AIDS Program which provides emergency housing assistance (hotel/motel vouchers). The City and County of Denver receives approximately $1.6M from HUD for HOPWA and approximately $2.2M for Ryan White from the U.S. Department of Health and Human Services.

**Discussion:**

The city's Short Term Rent Mortgage Utility Assistance Program (STRMU) is designed to prevent eviction and/or foreclosure for households in which at least one member has been diagnosed with HIV or AIDS. The STRMU program works in conjunction with Ryan White Part A programs, in which utility assistance is an eligible expense. Utility assistance is available through the STRMU program. The City’s historical provider has been CHN/DCAP – they have provided a mix of eviction, utility shutoff, and foreclosure assistance via their administration of the STRMU program. There is a maximum annual allowance, per household, that can be accessed all at once or in parts. The STRMU assistance is not available to households receiving tenant based rental assistance (TBRA) or other housing subsidies. Permanent Housing Placement assistance may not be accessed within 30 days of STRMU assistance.
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DENVER

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The availability of senior centers, recreational gyms, and other public facilities greatly influences the general appeal and cohesiveness of Denver’s communities. Support for the facilities that provide services to the homeless, the disabled, youth, or other populations is necessary for a healthy community.

Top needs for public facilities and infrastructure include sidewalks, street lights and drainage, along with parks/community centers and energy efficiency improvements. Transportation was also a key issue among residents and stakeholders—particularly for low income residents and residents with disabilities who are reliant on public transit.

How were these needs determined?

These needs were determined through review and analysis, stakeholder engagement public hearing input, jobs, and providing a safety net for Denver’s most vulnerable populations in addition to DEDO’s strategic priorities and completed neighborhood plans. The resident survey from the Regional AI also helped to determine Denver’s public facilities needs.

Describe the jurisdiction’s need for Public Improvements:

The quality of any neighborhood plays an integral part in its livability. Pedestrian friendly sidewalks, trees and other simply physical improvements can lead to an increased neighborhood pride and encourages more foot traffic, increasing safety. Low-income neighborhoods typically have less adequate infrastructure in place, so more assistance to address issues such as block beautification, parks and playgrounds, community centers, tree planting, and elimination of slum and blight is necessary.

In the Regional AI, survey participants identified inadequate sidewalks, street lights, drainage, or other infrastructure as one of the top challenges in their neighborhood. Some resident comments on needed public improvements included:

- “Narrow sidewalks, unable to safely ride bike on Yale Ave between Colorado Blvd & I-25”
- “I use a wheelchair, half the time i have wheel in the street because of no ramps or the flag stone too high up my wheel chair will get stuck. I also will use bike trails or paths when i have too.”
- “Our neighborhood in SW Denver is absolutely devastated by a lack of walkability and car dependency. It is far and away the biggest problem facing our neighborhood. There have been numerous automobile related fatalities this year alone in our neighborhood.”
- “Large apartment complexes built without consideration for their impact on traffic, parking, road maintenance, schools, or public parks.”

Participants also mentioned the need for drainage improvements, which is a large focus of the city’s current and future public works projects. For more information on these public improvement projects, refer to: https://www.denvergov.org/content/denvergov/en/denver-department-of-public-works/projects.html

How were these needs determined?
These needs were determined through review and analysis, stakeholder engagement public hearing input, and providing a safety net for Denver's most vulnerable populations in addition to DEDO's strategic priorities and completed neighborhood plans. The resident survey from the Regional AI also helped to determine Denver’s public improvements needs.

**Describe the jurisdiction’s need for Public Services:**

Public services needs include support for rental assistance, after school, child care, public safety education, job training programs, local business/non-profit supports, as well as healthy access food programs. There is also an identified need for more mental health resources for the general population and for people with disabilities.

Supportive services for specific population groups include supports for residents transitioning out of homelessness and supportive services for people with disabilities transitioning out of institutions, and supports that help seniors age in place.

**How were these needs determined?**

These needs were determined through review and data analysis, stakeholder engagement public hearing input, DEDO's strategic priorities and completed neighborhood plans. The resident survey from the Regional AI also helped to determine Denver’s public services needs.
Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Denver’s housing prices—both rental and for-sale—have increased substantially over the past five years, exacerbating affordability challenges for residents across the city.

- According to 2017 ACS data, 66,161 renter households (47% of all renters) experience cost burden and 30,770 of those (22% of all renters) experience severe cost burden. Among owner households, 25 percent are cost burdened and 9 percent are severely cost burdened.\(^2\)
- Low income households and residents belonging to a racial/ethnic minority—particularly non-Asian minorities—are more affected by housing problems than higher income and non-Hispanic white households.
- The City currently has a 25,000-unit shortage affordable to households earning $25,000 or less per year.
- According to the resident survey from the Regional Analysis of Impediments to Fair Housing Choice, Denver residents’ top housing challenges are: increasing rent prices, not being able to afford a down payment to buy a house, and fear that landlords will stop accepting their housing vouchers.

Rental Market. At the time the 2019-2023 Consolidated Plan was prepared, the rental market was tight but also experiencing some stabilization: Rental vacancy rates in Denver increased over the last few years (7.2% in Q417) from record lows in 2011 and 2012. Even so, dramatic increases in rents over the past decade have created serious challenges for low- and moderate-income individuals and families in the rental market. Between 2000 and 2017, Denver’s median rent grew by 106 percent (from $585 to $1,204) while median income increased by only 65 percent.

According to 2017 ACS data, 66,161 renter households (47% of all renters) experience cost burden and 30,770 of those (22% of all renters) experience severe cost burden. Among owner households, 25 percent are cost burdened and 9 percent are severely cost burdened. Low-income renters, making 30 percent or below AMI, are disproportionately impacted by severe cost burden and substandard housing.

There is not sufficient housing in Denver for low income renters making less than $25,000 per year—the table below shows the rental gaps for the City and County of Denver in 2017 and indicates a shortage of 21,362 units affordable to households earning less than $25,000 per year.

\(^2\) Cost burden is defined as spending more than 30 percent of income on housing; severe cost burden is spending more than 50 percent of income on housing.
The gap of 25,000 units in 2017 reflects a decline in the shortage of units since 2010 when the gap was 27,000 units. This gap declined because of a decrease in low income renters. The city has 14,000 fewer renters earning $25,000 and less than in 2010. This is offset by a gain in higher income renters: the city now has 19,000 more renters earning more than $75,000 per year than in 2010. The number of rental units priced below $500 also declined (by 5,174) units but the loss of renters exceeded the loss of units within that rent/income category.

The decline in low income renters is likely driven by displacement—having to move when a resident did not want to move. The Regional AI identified displacement as a key housing issue in Denver and found (through survey results) that half of Denver renters who are precariously housed have been displaced.

Another notable shift in the gap is that in 2010, the gap was limited to households earning less than $20,000—that is, the market still had a surplus of units for households earning between $20,000 and $25,000 per year. By 2017, that surplus turned into a shortage as 20,614 units that had been priced between $500 and $625 raised rents above $625, were removed from the rental market, or were demolished.

The city’s renters with the greatest needs are a diverse group. Some are seniors living on fixed incomes; some are students hoping that higher educational attainment will improve their earnings; many, perhaps more than half, are single parents and married couples with children. Many of the city’s renters with the worst-case needs are special needs populations, at-risk of homelessness or formerly homeless, persons with disabilities, victims of domestic violence, residents challenged by mental illnesses and substance abuse.

Residents participating in the Regional AI focus groups were asked if the housing needs they described were more prevalent for certain racial and ethnic groups. Some Spanish Speaking residents, and residents with children, felt they were more likely than others to be treated poorly by landlords or to
face housing discrimination. Most focus group attendees agreed that low income people are equally challenged by Denver’s housing crisis. The exception is persons with disabilities who need both accessible and affordable housing—the supply of which is basically nonexistent. These residents have significantly disproportionately high needs if they are not living in publicly-subsidized housing.

**For Sale Market.** Denver’s homeownership rate (50%) has remained effectively the same since 2000. This is unlikely to change dramatically in the future given limited land to develop and the small number of renters who are potential homebuyers: less than a third of renters earn more than $75,000 per year. It should be noted that ownership rates vary widely by race/ethnicity in Denver. As discussed in the region’s AI, homeownership rates for African American and Hispanic residents are substantially lower than for non-Hispanic white and Asian residents.

Between 2000 and 2017, home values in Denver grew even faster than rents, from a $160,100 median home value to $395,100—a 147 percent increase. Slow wage increases and a low for sale housing supply put additional pressure on homeowners and renters looking to buy.

Housing problems are less common among owners than among renters, however one out of every four owner households (25%) is spending more than 30 percent of their income on housing and nearly one out of ten (9%) are spending more than half of their income on housing.

Renters who are seeking homes to buy and earn less than 100 percent of the AMI will have trouble finding affordable homes in some of Denver’s neighborhoods, particularly those with the highest performing schools and other community assets. The Regional AI found that one of the top three housing concerns among Denver residents was not being able to save enough money for a downpayment to purchase a home.

**MA-10 Number of Housing Units – 91.210(a) & (b)(2)**

**Introduction**

This section provides a broad overview of the types of residential units available in Denver, including those that target low income residents. The original data in the tool have been updated with 2017 ACS data.

**All residential properties by number of units**

<table>
<thead>
<tr>
<th>Property Type</th>
<th>Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-unit detached structure</td>
<td>144,512</td>
<td>45%</td>
</tr>
<tr>
<td>1-unit, attached structure</td>
<td>24,734</td>
<td>8%</td>
</tr>
<tr>
<td>2-4 units</td>
<td>18,804</td>
<td>6%</td>
</tr>
<tr>
<td>5-19 units</td>
<td>42,564</td>
<td>13%</td>
</tr>
<tr>
<td>20 or more units</td>
<td>89,040</td>
<td>28%</td>
</tr>
<tr>
<td>Mobile Home, boat, RV, van, etc</td>
<td>897</td>
<td>0%</td>
</tr>
</tbody>
</table>
### Unit Size by Tenure

<table>
<thead>
<tr>
<th>Property Type</th>
<th>Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>No bedroom</td>
<td>1,140</td>
<td>1%</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>9,059</td>
<td>6%</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>41,721</td>
<td>28%</td>
</tr>
<tr>
<td>3 or more bedrooms</td>
<td>96,648</td>
<td>65%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>148,568</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Property Type</th>
<th>Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>No bedroom</td>
<td>13,483</td>
<td>9%</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>54,258</td>
<td>37%</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>56,457</td>
<td>38%</td>
</tr>
<tr>
<td>3 or more bedrooms</td>
<td>24,172</td>
<td>16%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>148,370</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

- Designated Elderly/Disabled Low-Income Housing: 339 units, funded through Low Income Public Housing Program (LIPH) and Low-Income Housing Tax Credit Program (LIHTC).
- Designated Elderly Low-Income Housing Units: 245 units, funded through Low Income Public Housing Program (LIPH) and Low Income Housing Tax Credit Program (LIHTC).
- Individual/Family Low-Income Housing: 5,390 units, funded through Low Income Public Housing Program (LIPH), Low Income Housing Tax Credit Program (LIHTC), and Multifamily Housing Program (MFH).

### Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to HUD’s Multifamily Assistance and Section 8 Contracts Database, as many as 1,200 assisted units have contracts that expire during the 2019-2023 Consolidated Plan period. These developments consist of project-based Section 8 properties and assisted housing for the elderly and developmentally disabled. Yet, this does not include all of the affordable housing inventory in the City and County of Denver. Housing an Inclusive Denver states that there are more than 2,200 affordable homes that are at risk of becoming unaffordable over the next five years if the existing income-restricted expire and owners can rent the units at market rate prices. The city could lose its existing affordable housing stock if income-restrictions expire, and families living in these affordable units are also at risk of displacement if the building converts to market rate pricing that is unaffordable to existing families.
Does the availability of housing units meet the needs of the population?

No, it does not. The problem is particularly acute for low income renters. For renter households making less than $25,000 per year, there is a rental gap of approximately 25,000 units.

Increasing rents and home prices have caused more Denver households to be cost burdened or severely cost burdened. Households making 30 percent or less of the Area Median Income (AMI), 30 to 50 percent of the AMI, or 50 to 80 percent of the AMI, are disproportionately cost-burdened.

Over 6,700 and 28,000 Denver households, making 30 percent or less of the AMI, are cost-burdened and severely cost-burdened, respectively. There are less than 10,000 rental units affordable to these extremely low income households. Although there are nearly 40,000 homeowner units affordable to these households, most of these homes are not for sale or renters cannot afford to become a homeowner. These households and other low income households will have a hard time finding sufficient and available housing that is affordable in Denver.

It is important to note that this does not include persons who are homeless: The 2017 Point-in-Time Count identified 3,445 persons without a permanent place to live in Denver.

The city’s renters with the greatest needs are a diverse group. Some are seniors living on fixed incomes; some are students hoping that higher educational attainment will improve their earnings; many, perhaps more than half, are single parents and married couples with children. Many of the city’s renters with the worst-case needs are special needs populations, at-risk of homelessness or formerly homeless, persons with disabilities, victims of domestic violence, residents challenged by mental illnesses, and substance abuse.

For more information on the current housing conditions see Housing an Inclusive Denver: https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing/HousingInclusiveDenver_FINAL_020918.pdf

Describe the need for specific types of housing:

Specific types of housing needed are rental units serving residents earning less than 30 percent AMI (including those transitioning out of homelessness); rentals affordable to households earning 30 to 80 percent AMI; and affordable ownership options for low- and moderate-income households. There is also a need for more affordable accessible housing options for people with disabilities.

Discussion

Please see above.
MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction


Cost of Housing

<table>
<thead>
<tr>
<th></th>
<th>Base Year: 2000</th>
<th>Most Recent Year: 2017</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Median Home Value</td>
<td>160,100</td>
<td>395,100</td>
<td>147%</td>
</tr>
<tr>
<td>Median Contract Rent</td>
<td>585</td>
<td>1,204</td>
<td>106%</td>
</tr>
</tbody>
</table>

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2017 ACS 1-year estimates (Most Recent Year)

<table>
<thead>
<tr>
<th>Rent Paid</th>
<th>Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $500</td>
<td>12,665</td>
<td>9%</td>
</tr>
<tr>
<td>$500-999</td>
<td>35,856</td>
<td>25%</td>
</tr>
<tr>
<td>$1,000-1,499</td>
<td>53,640</td>
<td>37%</td>
</tr>
<tr>
<td>$1,500-1,999</td>
<td>27,695</td>
<td>19%</td>
</tr>
<tr>
<td>$2,000 or more</td>
<td>14,917</td>
<td>10%</td>
</tr>
<tr>
<td>Total</td>
<td>144,773</td>
<td>100%</td>
</tr>
</tbody>
</table>

Table 30 - Rent Paid

Data Source: 2017 ACS 1-year estimates

Housing Affordability

<table>
<thead>
<tr>
<th>% Units affordable to Households earning</th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>30% HAMFI</td>
<td>9,920</td>
<td>38,510</td>
</tr>
<tr>
<td>50% HAMFI</td>
<td>12,150</td>
<td>22,970</td>
</tr>
<tr>
<td>80% HAMFI</td>
<td>20,410</td>
<td>27,335</td>
</tr>
<tr>
<td>100% HAMFI</td>
<td>13,005</td>
<td>13,395</td>
</tr>
<tr>
<td>Total</td>
<td>80,795</td>
<td>102,210</td>
</tr>
</tbody>
</table>

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

<table>
<thead>
<tr>
<th>Monthly Rent ($)</th>
<th>Efficiency (no bedroom)</th>
<th>1 Bedroom</th>
<th>2 Bedroom</th>
<th>3 Bedroom</th>
<th>4 Bedroom</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018 Fair Market Rent</td>
<td>$938</td>
<td>$1,127</td>
<td>$1,418</td>
<td>$2,031</td>
<td>$2,351</td>
</tr>
<tr>
<td>High HOME Rent</td>
<td>$938</td>
<td>$1,091</td>
<td>$1,312</td>
<td>$1,507</td>
<td>$1,661</td>
</tr>
</tbody>
</table>
Is there sufficient housing for households at all income levels?

Not for all households. For renter households making less than $25,000 per year, there is a rental gap of 24,795 units.

Increasing rents and home prices have caused more Denver households to be cost burdened or severely cost burdened. Households making 30 percent or less of the Area Median Income (AMI), 30 to 50 percent of the AMI, or 50 to 80 percent of the AMI, are disproportionately cost-burdened.

Over 6,700 and 28,000 Denver households, making 30 percent or less of the AMI, are cost-burdened and severely cost-burdened, respectively. There are less than 10,000 rental units affordable to these extremely low income households. Although there are nearly 40,000 homeowner units affordable to these households, most of the homes are not for sale or renters cannot afford the down payment. These households and other low income households will have a hard time finding sufficient housing that is affordable in Denver.

Many low income renters and persons experiencing and transitioning out of homelessness need affordable housing coupled with supportive services, including mental health services.

Renters who are seeking homes to buy and earn less than 100 percent of the AMI will have trouble finding affordable homes in some of Denver’s neighborhoods, particularly those with the highest performing schools.

For more information on the current housing conditions, see Housing an Inclusive Denver: https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing/HousingInclusiveDenver_FINAL_020918.pdf

How is affordability of housing likely to change considering changes to home values and/or rents?

During the last Consolidated Plan report, Denver was the top relocation destination for young adults. The demand for rental units by these newcomers (who typically rent longer than other age cohorts), coupled with Denver’s historically low rental vacancy rates at the time, helped spur the development of many multifamily apartment units. As a result, Denver experienced sporadic rental vacancy rates as new units came on the market. The Denver Metro Apartment Association 4Q17 survey reports Denver’s vacancy rate at 7.2—up from the previous three quarters. Despite this increased vacancy rate, the
continued low unemployment rate trend, continued immigration, and natural increases in the population will assist in the absorption of new units during the next year. The continually tight rental market is likely to put increased pressure on the city’s lowest income households, widen the rental affordability gap, and increase rental cost burden. Denver has started to experience this trend—many low-income renters have been replaced by high income renters. Most new development of multi-family units are geared towards these higher income renters. While rental prices may soften over the next 5 years, it is not likely to reach below $750—rental prices that are affordable to low income households. This will also impact low income households’ ability to save for a down payment and buy a home.

**How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

The 2 bedroom FMR of $1,418 is similar to the average rent of $1,432 reported by the Denver Metro Apartment Association 4Q17 survey, but the 1 bedroom FMR of $1,127 is much lower. The 4Q17 survey showed that rents varied dramatically by rental market area, with average rent for a 2 bedroom unit in downtown Denver at $1,938--substantially higher than the 2 bedroom FMR ($1,418). This was also true of the average 2 bedroom rent in central Denver ($1,951), northwest Denver ($1,909), and north central Denver ($1,676). One bedroom market area average rents were all higher than the 1 bedroom FMR except for the northeast and southeast areas. In sum, it would be difficult for families to find affordable 1 bedroom units in many rental market areas in Denver—or for rental developments based on HOME/FMR rents to cash flow without additional assistance—using FMR assistance alone.

**Discussion**

Please see above.
MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

This section provides an overview of the condition of Denver's housing stock. Much of these data are from HUD’s 2009-2013 CHAS and the 2017 ACS, which are the most recent data available.

Definitions

**Standard Condition**: A dwelling unit which meets HUD Section 8 HQS with no major defects in the structure and only minor maintenance is required. Such a dwelling will have the following characteristics: reliable roofs, sounds foundations, adequate and stable floors, walls, and ceilings, surfaces and woodwork that are not seriously damaged nor have pain deterioration, sound windows and doors, adequate heating, plumbing and electrical systems, adequate insulation and adequate water and sewer systems and are not overcrowded as defined by local code.

**Substandard condition**: A dwelling unit a unit that does not does not meet HUD section 8 HQS which includes lacking the following: complete plumbing, complete kitchen facilities, efficient and environmentally sound sewage removal and water supply, and heating source. Additionally, the dwelling may be overcrowded as defined by local code.

**Substandard but suitable for rehabilitation**: A dwelling unit, at a minimum, does not meet HQS with some of the same features as a “substandard condition” dwelling unit. This unit is likely to have deferred maintenance and may have some structural damage such as a leaking roof, deteriorated interior surfaces, and inadequate insulation. A “substandard but suitable” dwelling unit however, has basic infrastructure (including systems for clean water and adequate waste disposal) that allows for economically and physically feasible improvements and upon completion of rehabilitation meets the definition of a “standard” dwelling unit.

**Condition of Units**

<table>
<thead>
<tr>
<th>Condition of Units</th>
<th>Owner-Occupied</th>
<th>Renter-Occupied</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
</tr>
<tr>
<td>With one selected Condition</td>
<td>36,024</td>
<td>24%</td>
</tr>
<tr>
<td>With two selected Conditions</td>
<td>812</td>
<td>1%</td>
</tr>
<tr>
<td>With three selected Conditions</td>
<td>109</td>
<td>0%</td>
</tr>
<tr>
<td>With four selected Conditions</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>No selected Conditions</td>
<td>111,623</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>148,568</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

*Data Source: 2017 ACS 1-year estimates*
Year Unit Built

<table>
<thead>
<tr>
<th>Year Unit Built</th>
<th>Owner-Occupied</th>
<th>Renter-Occupied</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
</tr>
<tr>
<td>2000 or later</td>
<td>27,664</td>
<td>19%</td>
</tr>
<tr>
<td>1980-1999</td>
<td>18,101</td>
<td>12%</td>
</tr>
<tr>
<td>1950-1979</td>
<td>56,248</td>
<td>38%</td>
</tr>
<tr>
<td>Before 1950</td>
<td>46,555</td>
<td>31%</td>
</tr>
<tr>
<td>Total</td>
<td>148,568</td>
<td>100%</td>
</tr>
</tbody>
</table>

Table 34 – Year Unit Built

Data Source: 2017 ACS 1-year estimates

Risk of Lead-Based Paint Hazard

<table>
<thead>
<tr>
<th>Risk of Lead-Based Paint Hazard</th>
<th>Owner-Occupied</th>
<th>Renter-Occupied</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
</tr>
<tr>
<td>Total Number of Units Built Before 1980</td>
<td>102,803</td>
<td>69%</td>
</tr>
<tr>
<td>Housing Units build before 1980 with children present</td>
<td>13,035</td>
<td>10%</td>
</tr>
</tbody>
</table>

Table 35 – Risk of Lead-Based Paint

Data Source: 2017 ACS 1-year estimates (Total Units) 2009-2013 CHAS (Units with Children present)

Vacant Units

<table>
<thead>
<tr>
<th>Vacant Units</th>
<th>Suitable for Rehabilitation</th>
<th>Not Suitable for Rehabilitation</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vacant Units</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Abandoned Vacant Units</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>REO Properties</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Abandoned REO Properties</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 36 - Vacant Units

Data Source Comments: The city does not maintain such data.

Need for Owner and Rental Rehabilitation

Denver contains some of the State of Colorado's oldest housing stock. Still, compared to many older cities on the eastern coast, Denver's housing stock is relatively new and, as such, rehabilitation needs are more modest. Denver has also been successful in adding new homes through redevelopment of the former Lowry training facility and Stapleton airport. Finally, a renewed interest by new and existing residents in older, historic homes—and consequent rehabilitation of such homes—has led to higher quality housing stock overall.

At the time this plan was prepared, the largest need for rehabilitation of owner and rental housing was: 1) Apartment complexes built between 1950 and 1980 that have aged, are not as desirable as older or newer rental units (these units historically have had slightly higher vacancy rates than other
developments, although vacancies are currently very low for all development types) and, as such, lack capital improvement funds; and 2) Owner occupied homes built in the 1940s, 50s and 60s, whose residents are seniors and/or low income households. Some of these homeowners may need accessibility improvements.

**Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

As shown in the table above, an estimated 13,035 owner occupied and 6,815 renter occupied housing units in Denver were constructed before 1980 and have children under the age of 18 living in them. If these units contain a proportionate share of persons in poverty as the city proportion overall (7% of families with children live in poverty in Denver), then as many as 865 owner occupied and 452 renter occupied housing units in Denver could be occupied by low income families with children and contain lead based paint hazards.

**Discussion**

In addition to the issues described above, the City of Denver assessed natural hazards risks to low- and moderate-income residents, including risks expected to increase due to climate change.

Denver’s Climate Adaptation Plan outlines the key risks of climate change on Denver as well as the city’s resiliency efforts. According to that report, Denver’s key vulnerabilities include an increase in temperature and urban heat island effect, increase in extreme weather, and reduced snowpack and earlier snowmelt. While most of these impacts are universal to Denver residents (i.e., they are not neighborhood- or income-specific), one effect that could have a disproportinate impact on low income populations and people of color is reduced air quality that comes from hotter summer temperatures. Those populations have been shown to have a higher incidence of respiratory diseases and as such are more affected during periods of poor air quality. Equitable access to health care and energy efficiency (improving air quality indoors) are both important factors in addressing this potential disparity.

Extreme weather incidents combined with early snowmelt can create extreme flooding in Denver. Urban areas can be particularly vulnerable to flooding as water cannot be absorbed into the ground across impervious structures (such as paved streets, parking lots, and building footprints). To mitigate the impacts caused by impervious surfaces, Denver is prioritizing new green infrastructure projects, using parks, open space areas, and urban design to create networks that filter water for natural treatment before it discharges to waterways.

The most common natural disasters likely to cause housing damage in Colorado are tornadoes and hail storms. Low- and moderate- income households may have more difficulty recovering from such housing damage and may require additional resources/support to do so—including home repair programs.
The city’s Office of Emergency Management (OEM) leads Denver’s emergency management efforts “to cultivate safe, prepared, and resilient communities.” Representatives from across city departments serve help staff the Emergency Operations Center (EOC) when it is activated in response to natural disasters and/or other emergency situations in the city. This team participates in annual training and serves different aspects of the community both during and in the aftermath of emergency situations. Members of this team were included in stakeholder interviews conducted to inform the Consolidated Plan.

Overall, stakeholders felt the city is taking very intentional and proactive steps to make sure staff and residents are prepared to manage a significant natural or other disaster in the community. The EOC team is trained to help respond during a situation but also in the wake of a natural disaster—including reaching out to residents and businesses to help assess damage and connect them to recovery resources. The OEM also works consistently and proactively to provide guidance and informational resources to residents to help individuals prepare for natural disasters.

There are not geographic areas of the city known to have a disproportionately high risk of natural disasters though some residents and businesses may experience disproportionate impacts. Residents most vulnerable are those that depend on hourly wage employment as they do not receive wages if they cannot make it to work or their work is closed during or in the wake of a disaster. Small service-oriented businesses are also vulnerable as they are most impacted by potential closures and are the less likely than larger corporations to be able to weather a stoppage or shortage in cash flow.
MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Denver is served by one housing authority, the Denver Housing Authority (DHA). DHA is considered high functioning by HUD.

Totals Number of Units

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
<th>Special Purpose Voucher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Project-based</td>
<td>Tenant-based</td>
<td>Veterans Affairs</td>
<td>Family Unification</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Supportive Housing</td>
<td>Program</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Disabled *</td>
<td></td>
</tr>
</tbody>
</table>

| # of units vouchers available | 0 | 140 | 3,975 | 6,486 | 757 | 5,729 | 323 | 0 | 0 |
| # of accessible units        |   |     |       | 204   |     |      |     |   |    |

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center), Denver Housing Authority (DHA)

Describe the supply of public housing developments:

The Denver Housing Authority currently manages a portfolio of 3,797 public housing units comprised of high-rise, row type and dispersed properties.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Denver Housing Authority consistently receives the Department of Housing and Urban Development High Performer designation. The High Performer designation is based on the physical condition of our public housing units and administrative functions.
Public Housing Condition

<table>
<thead>
<tr>
<th>Public Housing Development</th>
<th>Average Inspection Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mountain View Towers</td>
<td>97</td>
</tr>
<tr>
<td>Mariposa Phase VI Apartments</td>
<td>90</td>
</tr>
<tr>
<td>Park Avenue Phase 3B</td>
<td>89</td>
</tr>
<tr>
<td>Park Avenue Phase 4B</td>
<td>91</td>
</tr>
<tr>
<td>Casa Loma</td>
<td>98</td>
</tr>
</tbody>
</table>

Table 38 - Public Housing Condition

Data Source: Denver Housing Authority (DHA)

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The Denver Housing Authority receives an annual Capital Fund Grant for the modernization and revitalization of its public housing units. The Housing Authority utilizes this fund to ensure the units are maintained on a 20-year lifecycle.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

DHA’s mission is to serve the residents of Denver by developing, owning, and operating safe, decent and affordable housing in a manner that promotes thriving communities.

Discussion:

Please see above.
MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The section summarizes the facilities, housing, and supportive services available to individuals and families in Denver experiencing homelessness.

Facilities and Housing Targeted to Homeless Households

<table>
<thead>
<tr>
<th></th>
<th>Emergency Shelter Beds</th>
<th>Transitional Housing Beds</th>
<th>Permanent Supportive Housing Beds</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year Round Beds</td>
<td>Voucher / Seasonal / Overflow Beds</td>
<td>Current &amp; New</td>
</tr>
<tr>
<td>Households with Adult(s) and Child(ren)</td>
<td>451</td>
<td>0</td>
<td>1,028</td>
</tr>
<tr>
<td>Households with Only Adults</td>
<td>1,775</td>
<td>135</td>
<td>512</td>
</tr>
<tr>
<td>Chronically Homeless Households</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Veterans</td>
<td>0</td>
<td>0</td>
<td>283</td>
</tr>
<tr>
<td>Unaccompanied Youth</td>
<td>40</td>
<td>0</td>
<td>148</td>
</tr>
</tbody>
</table>

Table 39 - Facilities and Housing Targeted to Homeless Households

Source: DHS (Pulled from 2018 HIC for only those projects with Geocode 089030).
Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Mainstream services in Denver through the Department of Human Services (DHS), the Department of Economic Development and Opportunity (DEDO), and the Department of Public Health and Environment (DDPHE) all coordinate to enhance the homeless crisis response system. DHS houses Denver’s Road Home, the City’s agency to strengthen, align & empower partnerships to create stable & supported pathways out of homelessness. Denver’s Road Home funds & collaborates with an array of programs for people experiencing homelessness, including street outreach, behavioral health navigators, detox programs, rapid re-housing and permanent & supportive housing. Denver’s Road Home also coordinates the City’s emergency shelter network and houses the system support team for OneHome – the Denver Metro Continuum of Care’s Coordinated Entry system. DHS also has a Community Outreach and Resource Engagement (CORE) Division, which provides a team of outreach workers, housed throughout the community in homeless service agencies, in order to expedite connection to mainstream benefits, such as Supplemental Nutrition Assistance Program (SNAP), Medicaid, Aid to the Needy and Disabled (AND), Old Age Pension (OAP), Temporary Aid to Needy Families (TANF), etc. In addition to the presence in the community, DHS offers access to assistance for housing, health care services, veterans’ benefits, employment & workforce services, and to respond to basic needs for food and health care.

DEDO provides coordination and planning for affordable housing development in the City. In addition, DEDO passes through funding for HOME, HOPWA, TBRA, and other similar federal funding sources – providing capacity for rapid re-housing and permanent & supportive housing programs. DEDO also provides employment and workforce services (about 10% of the people who receive such services are currently experiencing homelessness).

DDPHE houses the Office of Behavioral Health Strategies – which provides a variety of programs that enhance access to mental health services for people experiencing homelessness. A sampling of these programs includes behavioral health co-responder programs, mental health stabilization programs, and a variety of mental health focused, community-based court programs.

In terms of the extent to which health, mental health and employment services complement services targeted towards homeless persons –

- DHS provides outreach workers in the community to assist with Medicaid & Medicare enrollment
- Denver’s Road Home hosts monthly collaborative meetings to coordinate services between police, hospital, community mental health, and street outreach & shelter providers
- DHS provides employment & workforce services – with a team focused on services for homeless job seekers
- Denver’s Road Home hosts an Employment group – comprised of 60+ employment service providers & employers – with a goal of connecting homeless job seekers with paths to sustainable income.
- DHS provides behavioral health navigators on-site at their building – to help people who are becoming overwhelmed or escalated as they are accessing services.
- DDPHE Office of Behavioral Health has a mental health co-responder program where licensed mental health professionals are partnered with police to help respond to people with acute mental health needs who are encountering law enforcement, including many such people who are also experiencing homelessness.
List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The City of Denver relies on a robust network of non-profit service provider partners to provide services for people experiencing homelessness at their facilities. These facilities include:

- Denver Rescue Mission: Lawrence Street Community Center (meals, case management, day services); Holly Street Shelter, Lawrence Street Shelter (emergency overnight shelter single men); The Crossing (transitional housing for homeless families)
- Salvation Army: Crossroads Shelter (emergency overnight shelter single men); Lambuth Family Center (emergency shelter families); Housing Now (rapid re-housing program for families and seniors)
- Catholic Charities: Samaritan House (emergency shelter programs for men, women, veterans and families); East Emergency Shelter (emergency overnight shelter for women); Marisol Homes (transitional housing for homeless families)
- Volunteers of America: VOA Mission (meals, day services, case management); Bannock Youth Center (day services for youth, case management, housing programs); VOA Family Motel (emergency overnight shelter for families); Bill Daniels Veterans Service Center (day services, case management, Supportive Services for Veteran Families rapid re-housing programs for veterans)
- Veterans Community Resource and Referral Center: Day services & case management, housing programs for veterans. VA Outreach team
- Colorado Coalition for the Homeless: Family resource center (housing intake, case management for families); Stout Street Health Center (integrated medical care for homeless); numerous PSH & affordable housing properties; Street outreach team; Stout Street Day Center (resources hub & day services); employment services
- St. Francis Center: Day services, meals, case management, outreach team, employment services, housing programs
- The Gathering Place: Day services for women, children and transgender individuals – case management, resource & referrals, day services & meals
- Father Woody’s: day services, meals, case management
- Urban Peak: Drop in Center (day services, meals, education & employment program, case management for youth ages 15-24); Youth Shelter (emergency shelter for youth ages 15-20)

Facilities:
- Denver Human Services 3 facilities
  - Access to emergency motel vouchers for homeless families
  - Behavioral Health Navigation
  - Employment services & workforce development
  - Benefits enrollment for all populations (Medicaid, Medicare, SNAP, Old Age Pension, Aid to the Needy and Disabled)
  - Housing & Case Management services for youth aging out of foster care
  - Grants management for rapid rehousing, transitional housing, shelter, street outreach, permanent housing, and supportive service programs focused on people experiencing homelessness
- Veterans services (benefit enrollment, case management, housing resource support)
- System management for OneHome (Metro Denver’s Continuum of Care’s Coordinated Entry System)

- Mental Health Center of Denver (multiple facilities)
  - 24-hour walk-in crisis services
  - Permanent supportive housing for multiple populations
  - Forthcoming in 2019/2020 – Solutions center to help stability people experiencing homelessness having an acute mental health episode

- Veteran’s Affairs Community Resource & Referral Center
  - VA Benefits enrollment
  - Mental health support
  - VASH, SSVF and housing enrollment

- Denver Public Library (multiple locations)
  - Site based social work services for people experiencing homelessness who are accessing the library

- Denver Health (main hospital & multiple clinics)
  - Intensive outpatient clinic
  - Robust social work team, including discharge planning

**Community Based Services:**
- Denver Public Library (peer navigator services – outreach at Civic Center Park)
- Denver Police Department (Homeless Outreach Team, Mental Health Co-Responder Team)
- Denver’s Road Home (Street outreach, Street Behavioral health navigators, funding for a variety of services ranging from shelter, diversion, rapid rehousing, transitional housing and permanent and supportive housing.
- Public Health (Behavioral Health peer navigators, mental health court, homeless court)
- Health services provided through community collaborations with Stout Street Health center, and Denver Health.
MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

HOPWA Assistance Baseline Table

<table>
<thead>
<tr>
<th>Type of HOPWA Assistance</th>
<th>Number of Units Designated or Available for People with HIV/AIDS and their families</th>
</tr>
</thead>
<tbody>
<tr>
<td>TBRA</td>
<td>100</td>
</tr>
<tr>
<td>PH in facilities</td>
<td>0</td>
</tr>
<tr>
<td>STRMU</td>
<td>100</td>
</tr>
<tr>
<td>ST or TH facilities</td>
<td>0</td>
</tr>
<tr>
<td>PH placement</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 40– HOPWA Assistance Baseline

Data Source: HOPWA CAPER and Colorado Health Network 2019 contract

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Persons with Disabilities. Supportive services are a critical component of creating opportunity for people with disabilities to live in integrated settings in the community. These services are particularly important for residents transitioning out of institutional care.

In typical housing markets, persons with disabilities have difficulty finding housing that accommodates their needs. Regulatory barriers on group living arrangements, transit access, housing accessibility and visitability, and proximity to health services, are just some of the opportunity related issues that people with disabilities face.

The regional AI identified the following housing and community barriers for people disabilities: access to transportation, severe shortage of affordable accessible units, lack of emergency housing and/or housing options when evicted, lack of housing resources. The AI also found a need for better compliance with reasonable accommodation requests among landlords.

Stakeholder also identified a need for more mental health resources for the general population and for people with disabilities.

Elderly/Frail Elderly. Seniors and the elderly are much more likely to have a disability than non-seniors—33 percent of residents 65 and older have a disability compared to 6 percent of residents under the age of 65. As such, the supportive needs and housing needs of the elderly are often aligned with those of the disability community (discussed above). In addition, seniors typically need supports related to health care including access to health services and home health care options, transportation, and supports related to aging in place such as home modification, home repair, and assistance with maintenance.
Persons with HIV/AIDS. National estimates from the National Aids Housing Coalition report that approximately 13 percent of PLWHA are in need of housing assistance and 57% have an annual income below $10,000. Challenges to housing for those with HIV/AIDS include employment/income, rental history, criminal history, and co-occurring circumstances. It is difficult for people with HIV/AIDS to retain employment due to the effects on their health and the side effects of drug treatment therapies. Many have mental health issues/substance abuse issues as well. The two primary housing resources for PLWHA are Housing Opportunities for Persons With AIDS (HOPWA) which provides long-term, permanent, stable housing and the Ryan White HIV/AIDS Program which provides emergency housing assistance (hotel/motel vouchers). The City and County of Denver receives approximately $1.6M from HUD for HOPWA and approximately $2.2M for Ryan White from the U.S. Department of Health and Human Services.

Public housing residents. The majority of voucher holders and residents living in DHA properties are extremely low-income, with 81 to 82 percent making 30 percent or less of AMI. This compares to just 11 percent of residents that are extremely low-income in the region. African American/Black and Hispanic residents are overrepresented in DHA properties and as voucher recipients, as are residents living with a disability. Their needs for supportive services align with the broader low income population and the broader population with a disability.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The city has invested in providing 250 units of housing, located at 13 properties plus scattered sites, which are specifically designated for persons with serious and persistent mental illness. Each of the property owners has partnered with a supportive service provider to ensure that the individuals receive appropriate services.

The city has incorporated Section 504 requirements as well as ADA compliance to ensure that individuals with physical disabilities are given access to affordable housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The need for new affordable rental housing is great across Denver, and the City will continue to support development projects across all neighborhood types, but new development can act as a tool to bring affordability to areas near transit, job centers, and with high-performing schools. New development of affordable rental housing also provides an opportunity to address the unique challenges and provide housing for special populations such as seniors or people with disabilities. New construction can also provide opportunities to introduce unique design elements to serve specific populations, such as live-work units for artists.
And as demand for housing increases, the need for services increases—including transit access, retail and business services, as well as community facilities such as child care or outpatient health care. Mixed-use developments can bring life to neighborhoods lacking critical amenities such as grocery stores, incubator or worker space, or retail and increase access to opportunity throughout Denver neighborhoods.

Key Actions planned in 2019 include:

- Affordable rental housing development and preservation (for all low- to moderate income residents including those with special needs);
- Tenant based rental assistance (for all low- to moderate income residents including those with special needs);
- Emergency rehab, which largely serves seniors;
- Accessibility modifications for people with disabilities;
- Job training and bilingual business support for limited English proficient residents;
- Neighborhood services contracts that provide support for a variety of non-homeless special needs populations including services/support for teen families, health and wellness services, and job training services for youth.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City and County of Denver has a policy of regularly monitoring its policies for barriers to affordable and residential development. The city’s 2010 comprehensive update to its zoning code introduced form-based zoning, which generally takes a lighter hand on use controls by focusing on form and context, in theory, accommodating a broader range of housing uses.

This approach has been successful in attracting residential development to the city and accommodating the growing demand for living in Denver. However, this development has largely responded to the influx of higher income renters into the city and, other than through developments with density bonuses or public subsidies, has not added to the inventory of affordable housing.

The city considered the successes and challenges of the 2010 code update in its current code update, Blueprint Denver, as well as its Comprehensive Plan, Denveright. Updates that should facilitate more inclusiveness in housing diversity include:

1) Removing the designations of areas of “stability” and “change,” which were inconsistent with the application of form-based code in some contexts;
2) Considering diverse options for group living and household definitions;
3) Exploring opportunities to integrate missing middle housing into low- and low-medium residential areas by allowing 2- to 4-unit structures in locations where slightly higher density may be appropriate;
4) Evaluating and removing barriers to constructing accessory dwelling units (ADUs), ideally through a future citywide policy on ADUs.

The greatest challenge to affordable and residential development continues to be neighborhood resistance. Some of the initial updates to the city’s code were softened based on neighborhood feedback, particularly placement of ADUs and missing middle products. Many neighborhoods have used growth—and perceived or real increases in traffic congestion—to effectively fight rezoning requests that would add density to the city. Through expansion of the city’s Neighborhood Planning Initiative (NPI) process, the city hopes to better balance neighborhood concerns with growth demands in the future.
MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This section provides an overview of employment, workforce characteristics, and earnings in Denver. The data presented were pre-populated by the HUD eCon Plan tool and Denver’s most recent strategic economic development plan was used to show where the Denver Economic Development & Opportunity will invest its resources and focus.

Economic Development Market Analysis

Business Activity

<table>
<thead>
<tr>
<th>Business by Sector</th>
<th>Number of Workers</th>
<th>Number of Jobs</th>
<th>Share of Workers %</th>
<th>Share of Jobs %</th>
<th>Jobs less workers %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture, Mining, Oil &amp; Gas Extraction</td>
<td>3,888</td>
<td>10,233</td>
<td>1%</td>
<td>2%</td>
<td>1%</td>
</tr>
<tr>
<td>Arts, Entertainment, Accommodations</td>
<td>34,431</td>
<td>50,283</td>
<td>11%</td>
<td>11%</td>
<td>-1%</td>
</tr>
<tr>
<td>Construction</td>
<td>15,351</td>
<td>18,025</td>
<td>5%</td>
<td>4%</td>
<td>-1%</td>
</tr>
<tr>
<td>Education and Health Care Services</td>
<td>63,316</td>
<td>81,793</td>
<td>21%</td>
<td>18%</td>
<td>-3%</td>
</tr>
<tr>
<td>Finance, Insurance, and Real Estate</td>
<td>24,671</td>
<td>39,370</td>
<td>8%</td>
<td>9%</td>
<td>0%</td>
</tr>
<tr>
<td>Information</td>
<td>10,605</td>
<td>13,531</td>
<td>4%</td>
<td>3%</td>
<td>-1%</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>13,756</td>
<td>21,375</td>
<td>5%</td>
<td>5%</td>
<td>0%</td>
</tr>
<tr>
<td>Other Services</td>
<td>32,986</td>
<td>49,939</td>
<td>11%</td>
<td>11%</td>
<td>0%</td>
</tr>
<tr>
<td>Professional, Scientific, Management Services</td>
<td>39,030</td>
<td>64,342</td>
<td>13%</td>
<td>14%</td>
<td>1%</td>
</tr>
<tr>
<td>Public Administration</td>
<td>14,043</td>
<td>29,935</td>
<td>5%</td>
<td>6%</td>
<td>2%</td>
</tr>
<tr>
<td>Retail Trade</td>
<td>25,371</td>
<td>30,424</td>
<td>8%</td>
<td>7%</td>
<td>-2%</td>
</tr>
<tr>
<td>Transportation and Warehousing</td>
<td>9,481</td>
<td>25,108</td>
<td>3%</td>
<td>5%</td>
<td>2%</td>
</tr>
<tr>
<td>Wholesale Trade</td>
<td>13,896</td>
<td>28,300</td>
<td>5%</td>
<td>6%</td>
<td>1%</td>
</tr>
<tr>
<td>Total</td>
<td>300,825</td>
<td>462,658</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

Data Source: 2015 Longitudinal Employer-Household Dynamics
### Labor Force

| Total Population in the Civilian Labor Force | 415,415 |
| Civilian Employed Population 16 years and over | 402,288 |
| Unemployment Rate | 3.2 |
| Unemployment Rate for Ages 16-24 | 5.9 |
| Unemployment Rate for Ages 25-65 | 2.9 |

**Table 42 - Labor Force**

**Data Source:** 2017 ACS 1-year estimates

### Occupations by Sector

<table>
<thead>
<tr>
<th>Occupations by Sector</th>
<th>Number of People</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management, business and financial</td>
<td>190,997</td>
</tr>
<tr>
<td>Farming, fisheries and forestry occupations</td>
<td>484</td>
</tr>
<tr>
<td>Service</td>
<td>64,065</td>
</tr>
<tr>
<td>Sales and office</td>
<td>84,632</td>
</tr>
<tr>
<td>Construction, extraction, maintenance and repair</td>
<td>33,243</td>
</tr>
<tr>
<td>Production, transportation and material moving</td>
<td>28,867</td>
</tr>
</tbody>
</table>

**Table 43 – Occupations by Sector**

**Data Source:** 2017 ACS 1-year estimates

### Travel Time

<table>
<thead>
<tr>
<th>Travel Time</th>
<th>Number</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 30 Minutes</td>
<td>218,498</td>
<td>61%</td>
</tr>
<tr>
<td>30-59 Minutes</td>
<td>120,758</td>
<td>34%</td>
</tr>
<tr>
<td>60 or More Minutes</td>
<td>18,275</td>
<td>5%</td>
</tr>
<tr>
<td>Total</td>
<td>357,531</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Table 44 - Travel Time**

**Data Source:** 2017 ACS 1-year estimates

### Education:

**Educational Attainment by Employment Status (Population 16 and Older)**

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>In Labor Force</th>
<th>Not in Labor Force</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Civilian Employed</td>
<td>Unemployed</td>
</tr>
<tr>
<td>Less than high school graduate</td>
<td>27,788</td>
<td>4,938</td>
</tr>
</tbody>
</table>

**Data Source:** 2017 ACS 1-year estimates
### Educational Attainment by Employment Status

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>Civilian Employed</th>
<th>Unemployed</th>
<th>Not in Labor Force</th>
</tr>
</thead>
<tbody>
<tr>
<td>High school graduate (includes equivalency)</td>
<td>40,729</td>
<td>5,236</td>
<td>17,008</td>
</tr>
<tr>
<td>Some college or Associate's degree</td>
<td>65,295</td>
<td>6,514</td>
<td>16,531</td>
</tr>
<tr>
<td>Bachelor's degree or higher</td>
<td>138,921</td>
<td>6,350</td>
<td>16,660</td>
</tr>
</tbody>
</table>

**Table 45 - Educational Attainment by Employment Status**

**Data Source:** 2009-2013 ACS

### Educational Attainment by Age

<table>
<thead>
<tr>
<th>Age</th>
<th>18–24 yrs</th>
<th>25–34 yrs</th>
<th>35–44 yrs</th>
<th>45–65 yrs</th>
<th>65+ yrs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 9th grade</td>
<td>454</td>
<td>2,504</td>
<td>6,996</td>
<td>11,937</td>
<td>8,035</td>
</tr>
<tr>
<td>9th to 12th grade, no diploma</td>
<td>3,786</td>
<td>7,562</td>
<td>7,457</td>
<td>10,319</td>
<td>4,098</td>
</tr>
<tr>
<td>High school graduate, GED, or alternative</td>
<td>17,248</td>
<td>22,661</td>
<td>17,460</td>
<td>32,627</td>
<td>15,609</td>
</tr>
<tr>
<td>Some college, no degree</td>
<td>23,215</td>
<td>25,223</td>
<td>17,044</td>
<td>24,812</td>
<td>15,953</td>
</tr>
<tr>
<td>Associate's degree</td>
<td>1,590</td>
<td>7,985</td>
<td>4,955</td>
<td>10,292</td>
<td>3,720</td>
</tr>
<tr>
<td>Bachelor's degree</td>
<td>10,005</td>
<td>67,974</td>
<td>33,225</td>
<td>34,803</td>
<td>16,828</td>
</tr>
<tr>
<td>Graduate or professional degree</td>
<td>455</td>
<td>27,724</td>
<td>24,646</td>
<td>27,583</td>
<td>17,632</td>
</tr>
</tbody>
</table>

**Table 46 - Educational Attainment by Age**

**Data Source:** 2017 ACS 1-year estimates

### Educational Attainment – Median Earnings in the Past 12 Months

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>Median Earnings in the Past 12 Months</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than high school graduate</td>
<td>25,847</td>
</tr>
<tr>
<td>High school graduate (includes equivalency)</td>
<td>31,240</td>
</tr>
<tr>
<td>Some college or Associate's degree</td>
<td>37,367</td>
</tr>
<tr>
<td>Bachelor's degree</td>
<td>55,687</td>
</tr>
<tr>
<td>Graduate or professional degree</td>
<td>70,657</td>
</tr>
</tbody>
</table>

**Table 47 – Median Earnings in the Past 12 Months**

**Data Source:** 2017 ACS 1-year estimates

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

Denver's economy is diverse, with no one sector dominating the share of workers or jobs. The top three industries with the highest proportions of workers and share of jobs in 2015 are those that perform Education and Health Care services, Professional/Scientific/Management services, and...
Arts/Entertainment/Accommodation related activities (see Business Activity table above). Retail Trade and Finance/Insurance/Real Estate sectors round out the top 5, in terms of both number of workers and jobs available for the same period of analysis displayed in the Business Activity table.

Describe the workforce and infrastructure needs of the business community:

According to DEDO, some of the greatest challenges facing small businesses in Denver include 1) access to capital, 2) access to customers and 3) the availability of technical resources to start and operate small companies. Stakeholders identified similar needs in the 2018 Consolidated Plan survey, highlighting the need for assistance identifying loan/grant opportunities, low cost loans, and business plan development as the most common unmet needs related to small business and non-profit capacity.

In interviews, stakeholders also highlighted the growing issue of the shortage of skilled workers in construction trades and a need for skilled workers in all industries; the need for collaboration between various business sectors and the education system/training opportunities to connect students to future industries and to ensure that the proper skill sets are being cultivated; and the need for additional support for small businesses.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

DEDO’s Strategic Plan focuses on growing key existing industries as well as practicing targeted business development. Specific initiatives include develop innovation roadmap; strengthen inclusivity of innovation and start-up ecosystem and deploy resources into target neighborhood; expand second-stage company accelerator program; expand OED Small Business Lending program; assist businesses impacted by construction, changing neighborhoods, or market conditions; develop retention survey for key employers, targeted industry, and neighborhoods; and marketing and recruitment missions.

The BIO Fund is a pilot program for small businesses in the Globeville, Elyria, Swansea and Northeast Park Hill neighborhoods that are challenged by changing neighborhood conditions such as major public construction projects. The program intends to help impacted businesses stabilize and assists them toward achieving long term sustainability through a combination of financial and technical assistance.

The continued expansion of light rail in the metro Denver area should allow workers in downtown Denver easier access to jobs and potentially expand demand for downtown business services and the redevelopment of the Union Station neighborhood and train station has the potential to significantly increase revenue and opportunities for the people and the city of Denver.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?
Denver, as well as the State of Colorado, imports many of its highest-educated workers. The city and the state both desire to create more "home grown," highly-educated workers. Denver Economic Development & Opportunity partners with local community colleges, workforce development groups, Denver Public Schools and numerous other organizations in order to try to address what is called the "Colorado Paradox" of such a highly educated workforce in a state which has low local high school graduation rates and the lowest per pupil higher education spending in the nation in addition to many other fiscal challenges to the state education and workforce programs.

Targeted initiatives undertaken by the Denver Public Schools--e.g., expanding the reach and campuses of the Denver School of Science and Technology, CareerConnect, and CareerWise programs--are aimed to prepare the city's future workers for high-paying, high-demand employment opportunities. This is the goal of all the agencies and programs and is part of the annual initiatives and goals for the Denver Economic Development & Opportunity.

DEDO is also a partner in the WorkNow employment platform which places a strong focus on hard to serve populations from disadvantaged neighborhood for careers in the construction sector. Additionally, DEDO has restored its business support office funding and has developed an application, screening tool and funding for business entities that want to explore BID formation or expansion of an existing merchant association.

In general, there is a need for skilled workers in all industries and there is an acute shortage of skilled workers in construction trades.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Please see the Workforce Development section of JumpStart 2017. In sum, DEDO’s workforce delivery model blends contracted partners with various city and community resources to foster stronger partnerships and better serve jobseekers, such as veterans, long-term unemployed, and opportunity youth.

DEDO’s best-practice model includes: supporting two programs—WIOA and TANF—which aim to increase access to services and workforce participation rates; improving customer service and outcomes; publishing a dynamic “Career Pathways” framework; and reporting metrics. Developing strategic partnerships with DHS, United Neighborhoods, West Denver Renaissance Initiative, and Denver Workforce Development are an essential component to achieving these outcomes.

In addition, the workforce development strategy focuses on middle skill employment—creating training and job access programs for high-demand construction and technology jobs—and youth initiatives.

The strategies discussed above are aligned with the goals in the Strategic Plan of this Consolidated Plan.
Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

DEDO’s Strategic Plan, Propel, is fully integrated into this Consolidated Plan. It includes strategic initiatives around housing, neighborhoods, business and workforce development, small business opportunities, neighborhood equity, and operations. Details are discussed in Section SP-70.

Discussion

Please see above.
MA-50 Needs and Market Analysis Discussion

Are there any populations or households in areas or neighborhoods that are more affected by multiple housing problems?

Yes. As discussed in the Regional AI and in the Needs Assessment section of this Consolidated Plan, low income households and residents belonging to a racial/ethnic minority—particularly non-Asian minorities—are more affected by housing problems.

The Regional AI uses HUD-provided maps and data from the Affirmatively Furthering Fair Housing Tool to evaluate neighborhoods that are more affected by housing problems, concentrated poverty, and access to opportunity, along with an analysis of the populations living in such neighborhoods. (See below for additional details.

Are there areas in the Jurisdiction where these populations are concentrated?

The Regional AI uses HUD-provided maps and data from the Affirmatively Furthering Fair Housing Tool to evaluate concentrations of housing problems, racial/ethnic concentrations, and areas of concentrated poverty. (See Appendix for details). Those maps indicate, in general, that:

- Low income households who live in northeast Denver and Green Valley Ranch are more likely to have any of the 4 severe housing problems.
- Neighborhoods near universities also have a high percent of low income households with any of the 4 severe housing problems.
- Hispanic residents are clustered in West Denver and, to a lesser extent, North Denver.
- African American residents are clustered in North and Northeast Denver.
- There are five Census tracts considered by HUD to be Racially/Ethnically Concentrated Areas of Poverty (R/ECAP), defined as having a poverty rate of 40 percent and a racial and ethnic concentration. Denver’s R/ECAPs are located in East Colfax, Lincoln Park, West Colfax, and Sun Valley neighborhoods.

What are the characteristics of the market in these areas/neighborhoods?

In general, south central and south Denver--areas of non-Hispanic White concentrations--contain the city’s most expensive housing (both for sale and for rent) and have limited affordable housing opportunities. Housing in west (but not northwest) and far east Denver is more affordable; these are also areas of Hispanic and African American concentrations, respectively. Rental vacancy rates are low or stable across market areas. Historically, vacancy rates have been highest in the far southeast and south central rental market areas.

Neighborhoods with R/ECAPs in Denver (East Colfax, Lincoln Park, West Colfax, and Sun Valley) have traditionally been areas of affordable and publicly-subsidized housing and are also at risk of significant gentrification and change. Altogether, these R/ECAPs contain more than 14,000 residents. These areas
are largely Hispanic (67%). About one-fifth are LEP residents. The most common country of origin is Mexico.

**Are there any community assets in these areas/neighborhoods?**

Denver's neighborhoods all offer many--although sometimes different--community assets. These include strong schools, proximity to recreation centers and trails, proximity to downtown/southeast business districts/DIA, local restaurants and shopping districts, larger lots, and older or newer homes.

Denver has 5 racially concentrated areas of poverty (defined as an area where poverty rates exceed 40 percent and more than 50 percent minority). The areas that do exist are located in central and west Denver. These are areas where many public housing residents reside.

Areas of non-Hispanic White concentrations also contain many of the city's "distinguished" schools. That said, there are many schools that are ranked by the school district as "meeting expectations" in minority concentrated areas. Denver Public Schools has made a concerted effort to offer a variety of school choices in all areas of the city; indeed, many of the most recent charter and magnet programs are located in northeast Denver.

**Are there other strategic opportunities in any of these areas?**

In Denver’s Gentrification Study: Mitigating Involuntary Displacement, the city identified areas that are vulnerable to displacement and gentrification. These areas, located in GES, northeast Denver, and southwest Denver, tend to have certain characteristics, the main one being a history of disinvestment.

Although these areas have the highest levels of poverty and greatest needs, they also have strong opportunities in redevelopment of vacant and underutilized commercial and residential facilities. There are many opportunities where the city works closely with its partners--from nonprofit housing developers to private sector developers to funding organizations--to assemble investment and interest in redevelopment.

New investments in these neighborhood is an opportunity, but the findings from the Gentrification Study—there’s no silver bullet, investment in affordable housing continues to be a critical need, and access to economic opportunity needs to be considered as part of public investments—should be considered when redeveloping.
Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City has identified the following goals and priorities for the planning period.

Goals:

- Create and preserve housing affordability, accessibility, and quality
- Support business and workforce development
- Foster equitable access to city and neighborhood amenities and services
- Assist people who are homeless and at-risk of homelessness
- Assist populations with special needs
- Assist persons living with HIV/AIDS
- Affirmatively further fair housing choice

Priorities:

- Affordable Housing
- Housing and Services for People who are Homeless
- Transportation and Mobility
- Equity/Affirmatively further fair housing
- Public Facility and Infrastructure Improvements
- Neighborhood Support Services
- Business and workforce support
- Services for special populations
- Services for low and moderate income populations
SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 48 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA).

The City of Denver currently does not exclusively target geographic areas for its federal funds; rather these funds are made available to non-profit institutions, projects and programs citywide. Priorities for funding can be found in the City’s yearly NOFA as well as its ongoing affordable housing development application instructions found on the City’s website.
SP-25 Priority Needs - 91.215(a)(2)
This table has been reformatted from the HUD layout for clarity and simplicity.

## Priority Needs

<table>
<thead>
<tr>
<th>Need Name</th>
<th>Priority Level</th>
<th>Description</th>
<th>Basis for Relative Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable Housing</td>
<td>High</td>
<td>The city will prioritize activities in which a minimum of 50 percent of total units serve households at or below 60 percent AMI for rental and 80 percent AMI for sale.</td>
<td>Affordable housing was highlighted as a priority based on the needs assessment, market analysis, and community outreach. It is a persistent challenge in the Denver market and continues to be a strong focus for the City’s policies, programs, and funding allocation.</td>
</tr>
<tr>
<td>Housing and Services for people who are Homeless</td>
<td>High</td>
<td>The city has placed a priority on developments that provide permanent housing with supportive services to households earning 30 percent of the AMI and less and who are exiting shelters. The city also places high priority on service provision to address and prevent homelessness throughout the city.</td>
<td>This priority is not only evidenced in the most recent metro Denver Point-in-Time homeless count, but was also expressed as a very high need during the community and stakeholder engagement conducted for the Consolidated Plan.</td>
</tr>
<tr>
<td>Transportation and Mobility</td>
<td>High</td>
<td>This priority encompasses the need for transportation services, transit-oriented development, and increased accessibility for residents with mobility challenges. This priority affects housing development, infrastructure, neighborhoods, and services.</td>
<td>This priority was emphasized throughout community and stakeholder engagement conducted for this Consolidated Plan.</td>
</tr>
<tr>
<td>Need Name</td>
<td>Priority Level</td>
<td>Description</td>
<td>Basis for Relative Priority</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>----------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>4 Equity/Affirmatively further fair housing</td>
<td>High</td>
<td>The city desires to work proactively to reduce and mitigate barriers to fair housing choice and to affirmatively further fair housing choice, including fostering equity in neighborhood access to opportunity. The Regional Analysis of Impediments provides detail on the city's priorities to accomplish these goals.</td>
<td>This need is prioritized based on findings in the Regional Analysis of Impediments to Fair Housing Choice.</td>
</tr>
<tr>
<td>5 Public Facility and Infrastructure Improvements</td>
<td>High</td>
<td>Public enhancements may include infrastructure improvements such as upgrading sidewalks or parks, adding public amenities, Brownfields clean-up or accessibility upgrades. This need also includes building improvements for community-based facilities, for example, youth centers, human services organizations or other neighborhood-serving facilities to improve or increase programming provided to Denver residents.</td>
<td>This need is prioritized based on community and stakeholder engagement conducted for this Consolidated Plan as well as the impact infrastructure improvements can have on addressing other needs and goals identified in the Consolidated Plan.</td>
</tr>
<tr>
<td>6 Neighborhood Support Services</td>
<td>High</td>
<td>Provide funding for essential services such as education, employment and training programs, crime awareness, health services or youth programming to low- and moderate-income persons. Addressing these issues at the neighborhood level is a priority for the city.</td>
<td>This need is prioritized based on findings from the Regional AI, which identify neighborhood level disparities in access to opportunity, as well as community and stakeholder engagement conducted for this Consolidated Plan.</td>
</tr>
<tr>
<td>7 Business and workforce support</td>
<td>High</td>
<td>The city will prioritize projects that provide demonstrated commitments to job creation, retention and training, employment and contracting opportunities to very low and low income residents and/or eligible businesses. This includes providing funds to qualified business support organizations to stimulate the economy and facilitate the increase of businesses in areas of low to moderate incomes.</td>
<td>This priority is consistent with the city's efforts to increase job opportunities for low income residents and to foster self-sufficiency of businesses in low and moderate income neighborhoods.</td>
</tr>
</tbody>
</table>
High Projects that reserve units specifically for a special needs resident class receive priority for funding allocations as do public services strategically targeted to special needs groups.

This need is prioritized based on the analysis conducted for the needs assessment and market analysis sections of the Consolidated Plan as well as the community and stakeholder outreach conducted for the Plan.

High Providing public services to low and moderate income residents is a fundamental component of the city's anti-poverty strategy and overall approach to addressing housing and community development needs city-wide.

This need is prioritized based on the analysis conducted for the needs assessment and market analysis sections of the Consolidated Plan as well as the community and stakeholder outreach conducted for the Plan.

Table 49 – Priority Needs Summary

Narrative (Optional)
### SP-30 Influence of Market Conditions – 91.215 (b)

#### Influence of Market Conditions

<table>
<thead>
<tr>
<th>Affordable Housing Type</th>
<th>Market Characteristics that will influence the use of funds available for housing type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tenant Based Rental Assistance (TBRA)</td>
<td>Continued rising rents, increasing displacement of low income residents, high demand for Housing Choice Vouchers, gap of 25,000 rental units to meet need for renters earning less than $25,000 per year.</td>
</tr>
<tr>
<td>TBRA for Non-Homeless Special Needs</td>
<td>Continued rising rents, increasing displacement of low income residents, high demand for Housing Choice Vouchers, gap of 25,000 rental units to meet need for renters earning less than $25,000 per year, disproportionate impact of housing needs on non-homeless special needs populations.</td>
</tr>
<tr>
<td>New Unit Production</td>
<td>Continued rising rental and homeownership prices, increasing displacement of low income residents.</td>
</tr>
<tr>
<td>Rehabilitation</td>
<td>Stagnant incomes of owners who are low income, elderly and have special needs, tight capital market for home improvement financing (e.g., loan denials for home improvement loans in certain neighborhoods and for low income owners), and shortage of accessible housing stock.</td>
</tr>
<tr>
<td>Acquisition, including preservation</td>
<td>Continued rising rental and homeownership prices, increasing displacement of low income residents.</td>
</tr>
</tbody>
</table>

Table 50 – Influence of Market Conditions
**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

The following table outlines the anticipated resources for the planning period, based on the annual allocation in Program Year 2019.

**Anticipated Resources**

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amt Available Remainder of ConPlan $</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>public-federal</td>
<td>Acquisition</td>
<td>6,796,880</td>
<td>20,622,354</td>
<td>Based on 2019 allocation amounts</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Admin and Planning</td>
<td>4,500,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Economic Development</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Housing</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Public Improvements</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Public Services</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HOME</td>
<td>public-federal</td>
<td>Acquisition</td>
<td>2,935,765</td>
<td>4,926,765</td>
<td>Based on 2019 allocation amounts</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homebuyer assistance</td>
<td>500,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homeowner rehab</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Multifamily rental new construction</td>
<td>1,491,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Multifamily rental rehab</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>New construction for ownership</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>TBRA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HOPWA</td>
<td>public-federal</td>
<td>Housing</td>
<td>2,278,782</td>
<td>8,444,015</td>
<td>Based on HOPWA modernization projections</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Short term or transitional housing facilities</td>
<td>0.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>STRMU</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Supportive services</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>TBRA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ESG</td>
<td>public-federal</td>
<td>Conversion and rehab for transitional housing</td>
<td>582,032</td>
<td>582,032</td>
<td>Based on 2019 allocation amounts</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Financial Assistance</td>
<td>0.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Overnight shelter</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rapid re-housing (rental assistance)</td>
<td>0.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rental Assistance Services</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Transitional housing</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 51 - Anticipated Resources
Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

These funds (specifically, CDBG and HOME) will be leveraged by funds from a number of sources, including local government, philanthropy, private investments, and other programs. Historically, Denver has been able to leverage HUD-funds at a rate of 10:1 (minimum) within housing development and preservation projects and 4:1 for non-profit/neighborhood projects and business loans. These funds come to the developments and programs in several ways, through grants, low interest loans, and other investments/program support.

Additional resources include:

- Local funds derived from property taxes, Affordable Housing Linkage, General Fund/Denver Human Service Fund transfer, and Recreational Marijuana Sales Tax.
- Skyline urban renewal funds which have established a revolving loan fund focused on community redevelopment.
- Private Activity Bonds received from the State of Colorado.
- Other federal funds, including: The Low Income Housing Tax Credit (LIHTC), Community Services Block Grant funds (CSBG), Federal Emergency Management Agency (FEMA) funds; Community Foods and Nutrition Program (CFN); McKinney-Vento Homeless Assistance funds and Shelter Plus Care; Temporary Assistance for Needy Families (TANF).
- Private resources will largely be generated through private public partnerships and foundations.

The use of HOME and ESG funds carry match requirements from non-federal sources. The required match contribution is 25 percent. ESG funds will be matched 100%. To secure this match the city will utilize a local appropriation for affordable housing, nonprofits’ ability to secure funding from private foundations, fees earned from bond financing and the value, minus all encumbrances, of land or other real property not acquired from federal resources, and other allowable contributions.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.
The city consistently evaluates the publicly owned land that could be used to address housing and community development needs in the city. As such land becomes available and is determined to be a viable option for addressing such needs, the city will issue appropriate Request for Qualifications for development/redevelopment.

At the time this Consolidated Plan was written the City had recently allocated two parcels along East Colfax for development including affordable housing and supportive services and had two more parcels out for RFQ for redevelopment as a viable neighborhood amenity in the Globeville neighborhood.

**Discussion**

See above.
SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

<table>
<thead>
<tr>
<th>Responsible Entity</th>
<th>Responsible Entity Type</th>
<th>Role</th>
<th>Geographic Area Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>DENVER</td>
<td>Other</td>
<td>Economic Development</td>
<td>Jurisdiction</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-homeless special needs</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ownership</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Planning</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rental</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>neighborhood improvements</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>public facilities</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>public services</td>
<td></td>
</tr>
</tbody>
</table>

Table 52 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Denver has a strong community of non-profit organizations and public institutions that provide resources and services to address housing and community development needs citywide. This is evidenced, in part, by the 300 respondents to the Consolidated Plan stakeholder survey who all provided meaningful feedback on needs and solutions in the city. However, some stakeholder expressed a desire for better collaboration, coordination, and transparency across departments and organizations. The primary gap in the delivery system is a lack of funding to adequately address needs in the city.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

<table>
<thead>
<tr>
<th>Homelessness Prevention Services</th>
<th>Available in the Community</th>
<th>Targeted to Homeless</th>
<th>Targeted to People with HIV</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homelessness Prevention Services</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Counseling/Advocacy</td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Legal Assistance</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mortgage Assistance</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Rental Assistance</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Utilities Assistance</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Street Outreach Services

| Law Enforcement                 |                             |                       |                             |
| Mobile Clinics                  | X                           |                       |                             |
| Other Street Outreach Services  | X                           |                       |                             |
### Supportive Services

<table>
<thead>
<tr>
<th>Service</th>
<th>X</th>
<th>X</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alcohol &amp; Drug Abuse</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Child Care</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Employment and Employment Training</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Healthcare</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>HIV/AIDS</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Life Skills</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Mental Health Counseling</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Transportation</td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

**Table 53 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

Health, mental health and employment services are available to persons who are homeless and persons with HIV/AIDS in several locations most of which are located downtown or in central Denver. The St. Francis Center--the region's largest day shelter--has an employment counselor on site who assists with employment applications and job searches. Many of the city's larger assisted housing providers also have employment counselors on staff.

The Colorado Coalition for the Homeless operates the Stout Street Clinic in downtown Denver, which provides centralized health and mental health services to persons who are homeless at no charge. Denver is also home to the nationally renowned Denver Health, which provides health care services to low income households.

These services have been in place for many years in Denver and are actively used by persons who are homeless and/or who have HIV/AIDS.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The strength of the service delivery system is though the collaborative partnerships established with community based providers. This is especially evident in delivery of emergency services, transitional housing, and health care. The city and community based partners have improved coordination of services during severe weather and services for veterans.
Gaps in service are evident in providing services to offenders, persons making an efficient transition from emergency shelters to transitional housing. This also includes a lack of critical resources for mental health services, healthcare, substance abuse and child care. These critical components of the service delivery system are inadequately funded and this can cause uncertainty for homeless providers on their long term ability to provide services for stability and self-sufficiency.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Denver’s strategy to overcoming gaps is demonstrated by an emphasis on rapid re-housing, prevention and case management services, increasing resources for youth, especially pregnant women or those with newborns and toddlers, provision of Family Unification Program vouchers with support services. A pilot program is being managed to help connect persons discharged from institutions and encouraging connecting them with mental health services and housing. In summary improving system integration to ensure access to mainstream resources remains a priority.

**SP-45 Goals Summary – 91.215(a)(4)**

See table on following page. Note that many projects and activities support more than one goal. In attributing funding amounts to each goal the table below “shares” project level funding among each goal it supports. For example, if a $1,000,000 project supports both Goal 3 (Foster equitable access to city and neighborhood amenities and services) and Goal 7 (Affirmatively further fair housing choice) then the funding for that project is allocated equally between those to goals ($500,000 to Goal 3 and $500,000 to Goal 7).

The funding amounts and outcome indicators assume that the remaining Consolidated Plan years have similar allocations as the 2019 Program Year.
## Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Create and preserve housing affordability, accessibility, and quality</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing</td>
<td>Affordable Housing; Housing and Services for Homeless; Transportation and Mobility; Equity/Affirmatively further fair housing</td>
<td>$16.0 million</td>
<td>3,000 persons assisted; 11,380 households assisted; 730 housing units</td>
</tr>
<tr>
<td>2</td>
<td>Support business and workforce development</td>
<td>2019</td>
<td>2023</td>
<td>Non-Housing Community Development</td>
<td>Transportation and Mobility; Equity/Affirmatively further fair housing; Business and workforce support; Services for special populations; Services for low and moderate income populations</td>
<td>$6.0 million</td>
<td>250 jobs created; 5,000 businesses assisted</td>
</tr>
<tr>
<td>3</td>
<td>Foster equitable access to city and neighborhood amenities and services</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Non-Housing Community Development</td>
<td>Affordable Housing; Transportation and Mobility; Equity/Affirmatively further fair housing; Public Facility and Infrastructure Improvements; Neighborhood Support Services</td>
<td>$18.0 million</td>
<td>150,000 persons impacted</td>
</tr>
<tr>
<td>4</td>
<td>Assist people who are homeless and at-risk of homelessness</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Homelessness</td>
<td>Affordable Housing; Housing and Services for Homeless; Equity/Affirmatively further fair housing</td>
<td>$1.9 million</td>
<td>11,500 persons assisted</td>
</tr>
<tr>
<td>5</td>
<td>Assist populations with special needs</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Non-Homeless Special Needs</td>
<td>Affordable Housing; Transportation and Mobility; Equity/Affirmatively further fair housing; Public Facility and Infrastructure Improvements; Neighborhood Support Services; Business and workforce support; Services for special populations; Services for low and moderate income populations</td>
<td>$7.3 million</td>
<td>4,520 persons assisted</td>
</tr>
<tr>
<td>6</td>
<td>Assist persons living with HIV/AIDS</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Non-Homeless Special Needs</td>
<td>Affordable Housing; Services for special populations</td>
<td>$5.7 million</td>
<td>7,330 persons assisted</td>
</tr>
<tr>
<td>7</td>
<td>Affirmatively further fair housing choice</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Non-Housing Community Development; Non-Homeless Special Needs</td>
<td>Affordable Housing; Transportation and Mobility; Equity/Affirmatively further fair housing; Public Facility and Infrastructure Improvements; Neighborhood Support Services; Business and workforce support; Services for special populations; Services for low and moderate income populations</td>
<td>$6.1 million</td>
<td>No outcome indicator; included in above estimates</td>
</tr>
</tbody>
</table>
Table 54 – Goals Summary

<table>
<thead>
<tr>
<th>Goal Name</th>
<th>Goal Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Create and preserve housing affordability, accessibility, and quality</td>
<td>This goal includes activities that invest in the creation of affordable housing in vulnerable and opportunity areas, preserve affordability of housing, and stabilize residents at risk of involuntary displacement and promote equitable access to housing options.</td>
</tr>
<tr>
<td>2 Support business and workforce development</td>
<td>This goal supports businesses and workforce development through collaboration between public, private and the nonprofit sectors. Efforts will focus on improving access to capital and technical resources (e.g., accounting, marketing and mentorship) to start and operate small companies. It also supports workforce development through job training, and job supports (e.g., childcare, transportation, etc.)</td>
</tr>
<tr>
<td>3 Foster equitable access to city and neighborhood amenities and services</td>
<td>This goal includes activities that create equitable choices for residents and business to choose to prosper in place, anticipate and prevent involuntary displacement and disruptive neighborhood changes, foster equitable access to city and neighborhood amenities and services.</td>
</tr>
<tr>
<td>4 Assist people who are homeless and at-risk of homelessness</td>
<td>This goal includes activities targeted to persons and families experiencing and at-risk of homelessness.</td>
</tr>
<tr>
<td>5 Assist populations with special needs</td>
<td>This goal consists of activities to help persons with special needs access needed supportive services and facilities, as well as to provide affordable and accessible housing.</td>
</tr>
<tr>
<td>6 Assist persons living with HIV/AIDS</td>
<td>This goal consists of activities to help persons living with HIV/AIDS and their families achieve and maintain a high standard of living and satisfactory health status.</td>
</tr>
</tbody>
</table>
7 | **Goal Name** | Affirmatively further fair housing choice |
---|---|---
**Goal Description** | This goal includes activities that support implementation of the Regional Analysis of Impediments. |

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

See Goals table above.
SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Denver Housing Authority's public housing portfolio complies with accessibility requirements under Section 504 and the Fair Housing Act.

Activities to Increase Resident Involvements

DHA continues to work with the established agency-wide Resident Council Board, which represents resident leaders from all public housing developments and their representatives of the developments Local Resident Council. The duly elected residents to represent the interests of residents with the staff of DHA, including input to DHA Annual Plan. DHA has active Resident Services Department which administers HUD grants for Resident Self-sufficiency, Work Force development, Youth employment and training, senior independent living, resident leadership, access to the digital divide and homeownership, etc.

Is the public housing agency designated as troubled under 24 CFR part 902?

no

Plan to remove the ‘troubled’ designation

N/A.
SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Section MA-40 discussed the impact of public policies on affordable housing and residential investment in detail. The greatest challenge to affordable and residential development continues to be neighborhood resistance. Some of the initial updates to the city’s code were softened based on neighborhood feedback, particularly placement of ADUs and missing middle products. Many neighborhoods have used growth—and perceived or real increases in traffic congestion—to effectively fight rezoning requests that would add density to the city. Through expansion of the city’s Neighborhood Planning Initiative (NPI) process, the city hopes to better balance neighborhood concerns with growth demands in the future.

Market conditions also create significant barriers to affordable housing throughout the city. Though there has been consistent residential development over the past five years, this development has largely responded to the influx of higher income renters into the city and, other than through developments with density bonuses or public subsidies, has not added to the inventory of affordable housing. Continued in-migration of young workers to the city has exacerbated rising rents and home values while development struggles to keep pace and to accommodate low- and moderate income residents.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Housing an Inclusive Denver establishes four core goals to guide the City’s affordable housing strategies over the next five years, which also aims to reduce the barriers to affordable housing:

1) Create affordable housing in vulnerable areas AND in areas of opportunity.

By emphasizing a focus on residents rather than just the production of housing units, the City and its partners will prioritize specific neighborhood conditions, including areas vulnerable to displacement and neighborhoods that provide access to opportunity, when creating new affordable housing. The strategies under this goal include investing in land acquisition for future housing development and promoting development of mixed-income communities.

2) Preserve affordability and housing quality.

Preservation is a core component of Housing an Inclusive Denver. Denver will focus on preserving existing affordable housing, both homeownership and rental, in vulnerable neighborhoods and areas of higher opportunity. The strategies under this goal include investing to maintain affordability in non-subsidized housing and preserving or continuing affordability of existing publicly subsidized affordable housing.

3) Promote equitable and accessible housing options.

This plan seeks to align cross-cutting citywide actions and policies to support equitable and accessible housing options for Denver residents along the housing continuum. Actions or policy decisions under this goal will enable housing strategies more broadly through community engagement, formal legislative
or regulatory action, new and creative finance mechanisms, or programs that help residents access existing housing.

4) Stabilize residents at risk of involuntary displacement.

This plan seeks to build upon previous City efforts to identify neighborhoods throughout Denver that are vulnerable to gentrification by targeting resources to serve residents, both homeowners and renters, who are at risk of displacement. Policies or investments under this goal are aimed at helping to stabilize residents and support diverse, inclusive communities.

In addition to Housing an Inclusive Denver, the City’s Comprehensive Plan (Denveright) aims to reduce barriers to affordable development and through expansion of the city’s Neighborhood Planning Initiative (NPI) process, the city hopes to better balance neighborhood concerns with growth demands in the future.
SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Denver, through Denver’s Road home, contracts with a small group of homeless service providers to fund the Denver Street Outreach Collaborative (DSOC). This team of street outreach workers is comprised of staff from Colorado Coalition for the Homeless (chronic, veterans, families), Urban Peak (youth), St Francis Center (chronic), and Salvation Army (Chronic, veterans). In addition, members from the Denver Police Homeless Outreach Team and the Veterans Affairs outreach team participate as members of the DSOC. All members of the DSOC are trained in administering the VI-SDPAT assessment tool to help assess for vulnerability and match to appropriate housing interventions. In addition, the DSOC brings collective decades of work & expertise to the task of reaching people where they are at and engaging them in services with no precondition to come inside. These services have grown to include mobile medication management & services, search & rescue, and behavioral health services.

The Department of Human Services, through its CORE Division, also provides a team of outreach workers to work within shelters & day centers – so that families and individuals experiencing homelessness can be encouraged to apply for mainstream benefits, such as TANF, food stamps, Medicaid, Old Age Pension, Aid to Needy and Disabled, as well as child care assistance – without needing to arrive to a DHS building.

Addressing the emergency and transitional housing needs of homeless persons

The City of Denver invests into the emergency and transitional needs of people experiencing homelessness, primarily through the Denver’s Road Home program. DRH has been engaged with OneHome, the regional Coordinated Entry to Housing system for several years to help provide exits from shelter into permanent housing, and a more coordinated path to appropriate housing for people experiencing homelessness. DRH has provided leadership for a new shelter strategy in Denver – whereby shelter providers are shifting from a paradigm of providing crisis services, to a paradigm of providing shelter services that facilitate a tailored, sustainable path out of homelessness for each shelter guest.

For single men, women and transgender guests – emergency shelter needs are met through a network of non-profit partners, with a capacity of serving nearly 1600 guests per night. The City helps provide funding to these programs, as well as assistance with costs to transport guests to shelter each night. For families, in addition to a network of family shelter providers, Denver Human Services provides funding for emergency motel vouchers – with a capacity of serving approx. 26 families per night.
Transitional Housing is provided by several non-profit partners – many of which do not receive government funding for their services.

In addition to the transitional housing model, several community partners (including DRH) are adopting transition in place models, are increasing investments into rapid re-housing to stabilize families as quickly as possible.

**Helping homeless persons** (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

City of Denver and Denver's Road Home staff consistently meet with Metro Denver Homeless Initiative/CoC and homeless service providers to assess the demands for service and whether the current housing resources are meeting them. For example, planning for severe weather, especially in winter, may require the community to negotiate with shelters and the faith community to explore expansion of emergency shelter capacity. Prioritizing Rapid Re-Housing and prevention programs will help ensure focused resources—including case management—are available for homeless families and individuals. In recent years, The City has more than doubled investments into Rapid Rehousing, both through ESG programs, and through tax-funded programs via DRH.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The City of Denver has a few core programs that are focused on homeless prevention. These include the DEDO Temporary Rental and Utility Assistance Program (TRUA) and the DHS Homeless Prevention Programs, as well as number of ESG funded prevention programs whereby DHS contracts with non-profit programs to administer prevention dollars & services. The homeless prevention activities funded by the ESG program, specifically, the rental and mortgage payment assistance to prevent eviction and foreclosure will help to preserve affordable housing for those at risk of homelessness. Additionally, DHS has piloted a program to ensure that residents facing eviction are represented in court – and provided eviction prevention resources on the spot.
SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The Denver Department of Environment Health, the Mayor’s Office, Denver Housing Authority (DHA) and DEDO are actively collaborating on the Safe and Healthy Homes Initiative to eliminate lead-based paint hazards in ten years. Denver is one of the pilot cities selected by HUD for this program. Through its collaborative effort, the city is embarking on a detailed census and inventory of potential lead-based hazard areas. Additionally, in 2017 DDPHE applied for and was awarded a Lead Grant from the Office of Lead Hazard Control and Healthy Homes.

DED0 is also a member of the Colorado Lead Coalition. The Coalition is made up of a number of agencies and represented by over 40 members from various government agencies, non-profits, and industry. The current active agencies include: Colorado Department of Public Health and Environment/CDPHE, Colorado Department of Health Care Policy and Financing/HCPF, U.S. Environmental Protection Agency/EPA, U.S. Department of Housing and Urban Development/HUD, Denver Department of Public Health & Environmental/DPH, Rocky Mountain Poison and Drug Center, OED, Colorado Division of Housing (DOH), Denver Housing Authority, Denver Health, Children’s Hospital Colorado, and Denver Water.

The Coalition is a dedicated and diverse group of environmental and housing professionals from various organizations who draw on their respective backgrounds to fulfill the Coalition's Strategic Plan. The Plan includes goals and strategies in education and outreach, blood lead testing, housing, and regulations.

The City and County of Denver has been a national model for increasing access to housing without LBP hazards through its many large-scale new development projects: Green Valley Ranch, Lowry and Stapleton. All of the homes in these developments are free of LBP. These developments all contain newly-constructed affordable homes to buy.

How are the actions listed above related to the extent of lead poisoning and hazards?

Denver has some of the oldest housing stock in the metro area. Still, compared to urban areas in the midwest and east, there are fewer homes with LBP because residential growth in Denver occurred more recently. Denver has also enjoyed a rapid regeneration of older neighborhoods by moderate- to high-income residents, who have rehabilitated older homes. As such, Denver's focus for LBP mitigation and education is on neighborhoods with higher levels of poverty and older homes.

How are the actions listed above integrated into housing policies and procedures?

DED0 requires that developers receiving DED0 grants and rehabilitating housing built prior to 1978 provide documentation on how they will abate LBP hazards. This is a condition for loan/grant approval. Additionally, DED0 retains the services of a construction and rehabilitation consultant who reviews descriptions of work, construction bids, and conducts physical inspections for project undergoing
rehabilitation. The program specialist oversees and monitors lead-based paint compliance for the Single Family Rehab programs of the Denver Urban Renewal Authority (DURA) and NDHC.

DEDO acts as a pass-through for local nonprofit organizations applying for lead-based paint abatement grants. The Lead Hazard Control Program includes three areas of focus including education and outreach, risk assessment and lead hazard control. The education and outreach performs targeted screening of high risk populations by performing testing of elevated lead blood levels in children. DEDO also budgets CDBG funds to support lead-based paint hazard reduction activities.

NHDC also performs lead-based paint hazard risk assessments and manages the lead-safe home rehabilitation of homes with children under the age of 6 years (as well as in cases where a child has been lead poisoned in the home or is at high risk for lead poisoning) which are being rehabilitated with DEDO grants. Approximately 40 homes are rehabilitated each year under this program. NHDC also contracts with certified lead hazard contractor to perform inspections.
SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The city’s anti-poverty strategy is encapsulated in DEDO’s Strategic Plan, Propel Denver. The plan prioritizes economic inclusivity, preserving neighborhood vitality, competitive capacity, economic resiliency, and collaboration. Department goals, which are also imbedded in this Consolidated Plan are below.

- **Housing Goals:** Invest in the creation of affordable housing in vulnerable and opportunity areas; Preserve affordability of housing; Stabilize residents at risk of involuntary displacement and promote equitable access to housing options.

- **Business & Workforce Goals:** Continue to grow our own businesses; Practice targeted business development; Build Denver’s capacity to engage in global markets; Strengthen alignment between business needs and community assets to expand talent pipelines; Increase access to and impact of business and workforce services.

- **Division of Small Business Opportunity (DSBO) Goals:** Enhance the value of certifications for small, minority, and women owned businesses; Expand capacity of small, minority, and women owned businesses (MWBE); Improve access to opportunities for MWBE while ensuring program integrity; Close the gap in disparity for the MWBE community.

- **Neighborhood Equity Goals:** Create equitable choices for residents and business to choose to prosper in place; Anticipate and prevent involuntary displacement and disruptive neighborhood changes; Foster equitable access to city and neighborhood amenities and services.

- **Operations & Communications Goals:** Increase employee engagement; Increase outreach and marketing to connect more people to services that our Agency offers; Build a more effective and efficient Agency.

**How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan.**

*Housing an Inclusive Denver* establishes four core goals to guide the City’s affordable housing strategies over the next five years, which also aims to reduce the number of poverty-level families:

1) **Create affordable housing in vulnerable areas AND in areas of opportunity.** By emphasizing a focus on residents rather than just the production of housing units, the City and its partners will prioritize specific neighborhood conditions, including areas vulnerable to displacement and neighborhoods that provide access to opportunity, when creating new affordable housing. The strategies under this goal include investing in land acquisition for future housing development and promoting development of mixed-income communities.

2) **Preserve affordability and housing quality.** Preservation is a core component of Housing an Inclusive Denver. Denver will focus on preserving existing affordable housing, both homeownership and rental, in vulnerable neighborhoods and areas of higher opportunity. The
strategies under this goal include investing to maintain affordability in non-subsidized housing and preserving or continuing affordability of existing publicly subsidized affordable housing.

3) **Promote equitable and accessible housing options.** This plan seeks to align cross-cutting citywide actions and policies to support equitable and accessible housing options for Denver residents along the housing continuum. Actions or policy decisions under this goal will enable housing strategies more broadly through community engagement, formal legislative or regulatory action, new and creative finance mechanisms, or programs that help residents access existing housing.

4) **Stabilize residents at risk of involuntary displacement.** This plan seeks to build upon previous City efforts to identify neighborhoods throughout Denver that are vulnerable to gentrification by targeting resources to serve residents, both homeowners and renters, who are at risk of displacement. Policies or investments under this goal are aimed at helping to stabilize residents and support diverse, inclusive communities.

These goals from *Housing an Inclusive Denver* are imbedded in DEDO’s overall strategic plan and this Consolidated Plan’s goals. During the 2019-2023 Consolidated Plan, the City and County of Denver will allocate block grant funds to support the anti-poverty efforts described above.
SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

**Monitoring.** Denver assures fair and accurate monitoring of grantee and sub-grantee program functions and activities to maintain compliance with city, state and federal requirements. The monitoring responsibilities associated with the use of CDBG, HOME and HOPWA funds are carried out by several divisions within Denver Economic Development & Opportunity (DEDO), including Housing, Business Development, Neighborhoods, and Operations & Communications. All recipients of HUD funds through the City and County of Denver are subject to monitoring for regulatory and statutory compliance.

**Ongoing Monitoring.** Program staff and compliance staff review project reports when they are submitted by recipients. These reviews may identify the need for technical assistance or trigger a more thorough monitoring review, which could be an onsite monitoring (see below). Ongoing monitoring is also completed on loans, addressing financial, programmatic, and cross-cutting requirements. The financial review of the loan repayment contracts may reveal the need to complete a formal monitoring, although regular monitoring is conducted for programmatic and cross-cutting requirements, such as HQS inspections. The compliance staff assesses the needs of the recipient contract or loan during the ongoing monitoring process.

**Formal Monitoring.** A Contractor Risk Assessment is utilized to improve the efficiency and effectiveness of oversight of contracts and improve on internal control systems. A risk assessment is completed on every public service contract by contracts staff to determine what level and frequency monitoring will be required for a particular contractor. Upon the completion of a risk assessment, contracts staff can assess the contractor’s ability and capacity to administer and implement the contract as it exists and identify any deficiencies in the same areas that would affect the achievement of the goals of the contract. A monitoring schedule, which could include one or more site visits, desk reviews, or both, is developed based on the outcome of the risk assessment. In the case of an onsite review, the recipient will receive notification prior to, and an entrance conference will be scheduled in which an overview of the review will be provided. At that time, an exit conference will also be tentatively scheduled. The onsite review will consist of an administrative overview and sample review of files as appropriate. The following list consists of the program (project) areas that contract administrators monitor:

- HOME:
  - Tenant Based Rental Assistance (TBRA)
  - For Sale Housing
  - Rental Housing
- CDBG
  - Economic Development
- Housing
- Neighborhood Facilities
- Public Service
- HOPWA Services
- Cross Cutting Legislation:
  - Section 3
  - Section 504
  - Davis Bacon
  - Relocation
  - Environmental/Historical Clearance

**Site visits and inspections.** Denver Economic Development & Opportunity conducts an annual desk review on each multi-family housing development. Those that are flagged as high risk, a maximum of 10%, receive an on-site inspection to determine compliance with tenant selection processes, affirmative marketing, tenant income verification, as well as all requirements included in the contract between the City and the subrecipient. DEDO has developed a monitoring handbook that incorporates federal rules and regulations and a defined set of actions to monitor different programs and projects on a long-term basis.
## Expected Resources

**AP-15 Expected Resources – 91.220(c)(1,2)**

### Introduction

### Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Remainder of ConPlan $</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
<td>Prior Year Resources: $</td>
</tr>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>6,796,880</td>
<td>4,500,000</td>
<td>9,325,474</td>
</tr>
<tr>
<td>HOME</td>
<td>public - federal</td>
<td>Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA</td>
<td>2,935,765</td>
<td>500,000</td>
<td>1,491,000</td>
</tr>
<tr>
<td>HOPWA</td>
<td>public - federal</td>
<td>Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA</td>
<td>2,278,782</td>
<td>0.00</td>
<td>2,165,233</td>
</tr>
<tr>
<td>ESG</td>
<td>public - federal</td>
<td>Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing</td>
<td>582,032</td>
<td>0.00</td>
<td>582,032</td>
</tr>
</tbody>
</table>

Table 55 - Expected Resources – Priority Table
Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

These funds (specifically, CDBG and HOME) will be leveraged by funds from a number of sources, including local government, philanthropy, private investments, and other programs. Historically, Denver has been able to leverage HUD-funds at a rate of 10:1 (minimum) within housing development and preservation projects and 4:1 for non-profit/neighborhood projects and business loans. These funds come to the developments and programs in several ways, through grants, low interest loans, and other investments/program support.

Additional resources include:

- Local funds derived from property taxes, ($7.5 million), Affordable Housing Linkage Fees ($1.5 million), General Fund/Denver Human Service Fund transfer ($13.8 million), and Recreational Marijuana Sales Tax ($8 million).

- Skyline urban renewal funds which have established a revolving loan fund focused on community redevelopment.

- Private Activity Bonds received from the State of Colorado.

- Other federal funds, including: The Low Income Housing Tax Credit (LIHTC), Community Services Block Grant funds (CSBG), Federal Emergency Management Agency (FEMA) funds; Community Foods and Nutrition Program (CFN); McKinney-Vento Homeless Assistance funds and Shelter Plus Care; Temporary Assistance for Needy Families (TANF).

- Private resources will largely be generated through private public partnerships and foundations.

- The use of HOME and ESG funds carry match requirements from non-federal sources. The required match contribution is 25 percent. ESG funds will be matched 100%. To secure this match the city will utilize a local appropriation for affordable housing, nonprofits’ ability to secure funding from private foundations, fees earned from bond financing and the value, minus all encumbrances, of land or other real property not acquired from federal resources, and other allowable contributions.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The city consistently evaluates the publicly owned land that could be used to address housing and community development needs in the city. As such land becomes available and is determined to be a viable option for addressing such needs, the city will issue appropriate Request for Qualifications for development/redevelopment.
At the time this Consolidated Plan was written the City had recently allocated two parcels along East Colfax for development including affordable housing and supportive services and had two more parcels out for RFQ for redevelopment as a viable neighborhood amenity in the Globeville neighborhood.

Discussion

See above.
**Annual Goals and Objectives**

**AP-20 Annual Goals and Objectives**

See table below. Note that many projects and activities support more than one goal. In attributing funding amounts to each goal the table below “shares” project level funding among each goal it supports. For example, if a $1,000,000 project supports both Goal 3 (Foster equitable access to city and neighborhood amenities and services) and Goal 7 (Affirmatively further fair housing choice) then the funding for that project is allocated equally between those two goals ($500,000 to Goal 3 and $500,000 to Goal 7).

**Goals Summary Information**

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<th>Sort Order</th>
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<td>1</td>
<td>Create and preserve housing affordability, accessibility, and quality</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing</td>
<td>Affordable Housing; Housing and Services for Homeless; Transportation and Mobility; Equity/Affirmatively further fair housing</td>
<td>$8,976,626</td>
<td>600 persons assisted; 2,276 households assisted; 146 housing units</td>
</tr>
<tr>
<td>2</td>
<td>Support business and workforce development</td>
<td>2019</td>
<td>2023</td>
<td>Non-Housing Community Development</td>
<td>Transportation and Mobility; Equity/Affirmatively further fair housing; Business and workforce support; Services for special populations; Services for low and moderate income populations</td>
<td>$4,655,047</td>
<td>50 jobs created; 1,000 businesses assisted</td>
</tr>
<tr>
<td>3</td>
<td>Foster equitable access to city and neighborhood amenities and services</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Non-Housing Community Development</td>
<td>Affordable Housing; Transportation and Mobility; Equity/Affirmatively further fair housing; Public Facility and Infrastructure Improvements; Neighborhood Support Services</td>
<td>$5,455,047</td>
<td>30,000 persons impacted</td>
</tr>
<tr>
<td>Sort</td>
<td>Goal Name</td>
<td>Start Year</td>
<td>End Year</td>
<td>Category</td>
<td>Needs Addressed</td>
<td>Funding</td>
<td>Goal Outcome Indicator</td>
</tr>
<tr>
<td>------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------</td>
<td>----------</td>
<td>-------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>4</td>
<td>Assist people who are homeless and at-risk of homelessness</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Homelessness</td>
<td>Affordable Housing; Housing and Services for Homeless; Equity/Affirmatively further fair housing</td>
<td>$2,737,079</td>
<td>2,300 persons assisted</td>
</tr>
<tr>
<td>5</td>
<td>Assist populations with special needs</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Non-Homeless Special Needs</td>
<td>Affordable Housing; Transportation and Mobility; Equity/Affirmatively further fair housing; Public Facility and Infrastructure Improvements; Neighborhood Support Services; Business and workforce support; Services for special populations; Services for low and moderate income populations</td>
<td>$2,455,047</td>
<td>904 persons assisted</td>
</tr>
<tr>
<td>6</td>
<td>Assist persons living with HIV/AIDS</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Non-Homeless Special Needs</td>
<td>Affordable Housing; Services for special populations</td>
<td>$6,296,322</td>
<td>1,466 persons assisted</td>
</tr>
<tr>
<td>7</td>
<td>Affirmatively further fair housing choice</td>
<td>2019</td>
<td>2023</td>
<td>Affordable Housing; Non-Housing Community Development; Non-Homeless Special Needs</td>
<td>Affordable Housing; Transportation and Mobility; Equity/Affirmatively further fair housing; Public Facility and Infrastructure Improvements; Neighborhood Support Services; Business and workforce support; Services for special populations; Services for low and moderate income populations</td>
<td>Imbedded in other goals</td>
<td>No outcome indicator; included in above estimates</td>
</tr>
</tbody>
</table>

Table 56 – Goals Summary
### Goal Descriptions

<table>
<thead>
<tr>
<th></th>
<th>Goal Name</th>
<th>Goal Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Create and preserve housing affordability, accessibility, and quality</td>
<td>This goal includes activities that invest in the creation of affordable housing in vulnerable and opportunity areas, preserve affordability of housing, and stabilize residents at risk of involuntary displacement and promote equitable access to housing options.</td>
</tr>
<tr>
<td>2</td>
<td>Support business and workforce development</td>
<td>This goal supports businesses and workforce development through collaboration between public, private and the nonprofit sectors. Efforts will focus on improving access to capital and technical resources (e.g., accounting, marketing and mentorship) to start and operate small companies. It also supports workforce development through job training, and job supports (e.g., childcare, transportation, etc.)</td>
</tr>
<tr>
<td>3</td>
<td>Foster equitable access to city and neighborhood amenities and services</td>
<td>This goal includes activities that create equitable choices for residents and business to choose to prosper in place, anticipate and prevent involuntary displacement and disruptive neighborhood changes, foster equitable access to city and neighborhood amenities and services.</td>
</tr>
<tr>
<td>4</td>
<td>Assist people who are homeless and at-risk of homelessness</td>
<td>This goal includes activities targeted to persons and families experiencing and at-risk of homelessness.</td>
</tr>
<tr>
<td>5</td>
<td>Assist populations with special needs</td>
<td>This goal consists of activities to help persons with special needs access needed supportive services and facilities, as well as to provide affordable and accessible housing.</td>
</tr>
<tr>
<td>6</td>
<td>Assist persons living with HIV/AIDS</td>
<td>This goal consists of activities to help persons living with HIV/AIDS and their families achieve and maintain a high standard of living and satisfactory health status.</td>
</tr>
<tr>
<td>7</td>
<td>Affirmatively further fair housing choice</td>
<td>This goal includes activities that support implementation of the Regional Analysis of Impediments.</td>
</tr>
</tbody>
</table>
Projects

AP-35 Projects – 91.220(d)

Introduction

Below is a summary of the eligible projects that will take place during the program year that address the City's priority needs. Specific objectives are detailed in the individual project descriptions below.

The following are programs that Denver intends to fund for the program year 2019.

Projects

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Administration-CDBG, HOME, HOPWA, Section 108</td>
</tr>
<tr>
<td>2</td>
<td>Single Family/Emergency Rehabilitation</td>
</tr>
<tr>
<td>3</td>
<td>Land Trust Acquisition and Rehabilitation</td>
</tr>
<tr>
<td>4</td>
<td>Homeowner Assistance Programs</td>
</tr>
<tr>
<td>5</td>
<td>Housing Support</td>
</tr>
<tr>
<td>6</td>
<td>For-Sale Development and Preservation</td>
</tr>
<tr>
<td>7</td>
<td>Rental Housing Development and Preservation</td>
</tr>
<tr>
<td>8</td>
<td>Community Housing Development Organization-Set Aside</td>
</tr>
<tr>
<td>9</td>
<td>Community Housing Development Organization-Core Operation</td>
</tr>
<tr>
<td>10</td>
<td>Tenant Based Rental Assistance</td>
</tr>
<tr>
<td>11</td>
<td>Housing Access and Modification</td>
</tr>
<tr>
<td>12</td>
<td>Neighborhood Business Revitalization</td>
</tr>
<tr>
<td>13</td>
<td>Revolving Loan Fund</td>
</tr>
<tr>
<td>14</td>
<td>Economic Development Initiative</td>
</tr>
<tr>
<td>15</td>
<td>Neighborhood Improvements</td>
</tr>
<tr>
<td>16</td>
<td>Neighborhood Facilities &amp; Improvements</td>
</tr>
<tr>
<td>17</td>
<td>Neighborhood Support</td>
</tr>
<tr>
<td>18</td>
<td>2018 - 2021 City of Denver COH18F001 (Denver Colorado Health Network)</td>
</tr>
<tr>
<td>19</td>
<td>2018 - 2021 City of Denver COH18F001 (The Empowerment Program)</td>
</tr>
<tr>
<td>20</td>
<td>2018 - 2021 City of Denver COH18F001 (Visiting Nurse Association)</td>
</tr>
<tr>
<td>21</td>
<td>HESG Homeless Prevention</td>
</tr>
<tr>
<td>22</td>
<td>Reserved for new projects</td>
</tr>
</tbody>
</table>

Table 57 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

In preparation for the City’s annual budgeting process, as well as through the public process for federal funds, we identify the key issues facing Denver’s neighborhoods and low/moderate income residents. During the past three years, we have also extended our public outreach to understand the specific
needs and issues facing our residents with regard to access to safe, affordable housing.

This outreach has indicated a strong need for affordable and very affordable housing, along with the persistent need for homeless and housing with supportive services. Additionally, we have identified continuing stress on Denver’s non-profits ability to consistently serve residents in need.

DEDO researched and published, the *Gentrification Study: Strategies to Mitigate Involuntary Displacement* (February 2016). The study pointed out several actions or programs which could help mitigate the impacts of private and public investment on low/mod income individuals and families in our neighborhoods. These programs and strategies include focusing on job opportunity, non-profit and educational access, and working toward meeting the gap in of safe, affordable housing in Denver.

One of the greatest barriers to addressing many of the program and strategic challenges is lack of access to funding and resources. Focused, along with higher amounts of, funding is required to help address some of the unmet needed and gaps - in programming, staffing, operations and development. Community Development Block Grant fund have declined nationally and locally. The most flexible and largest of the four federal funds, CDBG, has seen its budget both federally and locally decline nearly 18% since 2001. This is severely affecting Denver’s ability to assist those populations most in need. Producing housing for the lowest income renters and populations with special needs particularly requires very deep subsidies. Denver is increasing our local funds, especially to address the housing gap, but this increase alone cannot meet the growing gap of resources to need.
## AP-38 Project Summary

The following table has been reformatted from the HUD version for simplicity and readability.

<table>
<thead>
<tr>
<th>Project Title</th>
<th>Project Description</th>
<th>Funding Estimate by Program</th>
<th>Estimated Beneficiaries</th>
<th>Planned Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration-CDBG, HOME, HOPWA, Section 108</td>
<td>To provide administration cost to carry out CDBG, HOME, and HOPWA eligible activities.</td>
<td>CDBG $2,000,000</td>
<td>n/a</td>
<td>2019 CDBG Administration &amp; Program delivery 2019 HOME Administration 2018 - 2021 Grantee Admin COH18F001 (City of Denver) 2019 Admin 2019 HESG Administration</td>
</tr>
<tr>
<td>Single Family/Emergency Rehabilitation</td>
<td>To provide low to moderate income homeowners with funds to rehabilitate their homes with needed repairs.</td>
<td>CDBG $250,000, HOME $850,000</td>
<td>54 housing units</td>
<td>DURA- EHR (14A; LMH) Denver Urban Renewal Authority - 2019 Single Family Rehabilitation (HOME)</td>
</tr>
<tr>
<td>Land Acquisition and Rehabilitation</td>
<td>Acquisition and Rehab for affordable housing and catalytic investment</td>
<td>CDBG $9,500,000</td>
<td>25 housing units 250 households</td>
<td>01; LMH/LMC/LMA</td>
</tr>
<tr>
<td>Homeowner Assistance Programs</td>
<td>Provide down payment assistance to low - moderate income residents in Denver.</td>
<td>CDBG $350,000</td>
<td>35 households</td>
<td>Colorado Housing Assistance Corp-DPA (13; LMH)</td>
</tr>
<tr>
<td>Housing Support</td>
<td>To provide housing counseling services to low to moderate income residents of Denver. Services are for home ownership and rental housing counseling, and tenant landlord counseling services.</td>
<td>CDBG $374,254, HOPWA $1,440,000</td>
<td>5,400 individuals/ households</td>
<td>Brothers Redevelopment-HC (05U; LMC) Colorado Housing Assistance Corp-HC (05U; LMC) NEWSED-HC (05U; LMC) DHA-HC (05U; LMC) Northeast Denver Housing Center -HC (05U; LMC) Brothers Redevelopment T/LL-HC (05K; LMC) Colorado Affordable Legal Srvs T/LL-HC (05K; LMC)</td>
</tr>
<tr>
<td>For-Sale Development and Preservation</td>
<td>This project is for the development or preservation of affordable housing in Denver.</td>
<td>HOME $500,000</td>
<td>n/a</td>
<td>01; LMH HOME</td>
</tr>
<tr>
<td>Rental Housing Development and Preservation</td>
<td>To provide funds for the development of new affordable rental housing for low to moderate income residents.</td>
<td>HOME $1,000,000, CDBG $1,024,000, HOPWA $1,442,705</td>
<td>10 housing units</td>
<td>4995 Washington Mixed Use (01; LMH) HOME HOPWA -PSH</td>
</tr>
<tr>
<td>Community Housing Development Organization-Set Aside</td>
<td>To provide funding to certified CHDO organizations for the development of affordable housing.</td>
<td>HOME $500,000</td>
<td>n/a</td>
<td></td>
</tr>
</tbody>
</table>

### Project Summary Information

Consolidated Plan

DENVER

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OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>Project Title</th>
<th>Project Description</th>
<th>Funding Estimate by Program</th>
<th>Estimated Beneficiaries</th>
<th>Planned Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>9 Community Housing Development Organization-Core Operation</td>
<td>To provide certified CHDO's with administration funds to carry out development projects.</td>
<td>HOME $75,000</td>
<td>n/a</td>
<td>Northeast Denver Housing Center, Inc.- 2018 CHDO NEWSED - 2019 CHDO Brothers Redevelopment- 2019 CHDO</td>
</tr>
<tr>
<td>10 Tenant Based Rental Assistance</td>
<td>To provide TBRA vouchers to low income residents of Denver.</td>
<td>HOME $632,000</td>
<td>54</td>
<td>Colorado Coalition for the Homeless - 2019 TBRA Family Tree - 2019 TBRA</td>
</tr>
<tr>
<td>11 Housing Access and Modification</td>
<td>To provide low to moderate income disabled and elderly residents to modify their homes for accessibility.</td>
<td>CDBG $300,000</td>
<td>33 housing units</td>
<td>Denver Urban Renewal Authority-RHAMP (14A &amp; 14B; LMH)</td>
</tr>
<tr>
<td>12 Neighborhood Business Revitalization</td>
<td>To provide businesses with loans for the expansion or start-up. As a result jobs will be either created or retained.</td>
<td>CDBG $1,000,000</td>
<td>14 jobs</td>
<td>18A; LMJ</td>
</tr>
<tr>
<td>13 Revolving Loan Fund</td>
<td>To provide businesses with funds for startup or expansion that will result in the creation or retention of jobs.</td>
<td>CDBG $1,000,000</td>
<td>16 jobs</td>
<td>18A; LMJ</td>
</tr>
<tr>
<td>14 Economic Development Initiative</td>
<td>To provide Business Support Offices and Business Improvement Districts with funds to assist local businesses with technical assistance.</td>
<td>CDBG $500,000</td>
<td>347 businesses</td>
<td>West Community Economic Development Corp (BuCu West) (18B; LMA) Rocky Mountain Micro Finance-BSO (18B; LMA) Mi Casa Resource Center - Bilingual Business Support (18B; LMA) NEWSED Micro Business (18B; LMA)</td>
</tr>
<tr>
<td>15 Neighborhood Improvements</td>
<td>To provide funds for neighborhood improvement projects.</td>
<td>CDBG $500,000</td>
<td>5 public facilities; 5,000 people</td>
<td>03 assorted; LMA</td>
</tr>
<tr>
<td>16 Neighborhood Facilities &amp; Improvements</td>
<td>To provide Denver non-profit/neighborhood facilities with funds for the rehabilitation of their facility.</td>
<td>CDBG $2,000,000</td>
<td>2 public facilities; 15,000 people</td>
<td>03 assorted; LMA</td>
</tr>
<tr>
<td>Project Title</td>
<td>Project Description</td>
<td>Funding Estimate by Program</td>
<td>Estimated Beneficiaries</td>
<td>Planned Activities</td>
</tr>
<tr>
<td>---------------</td>
<td>---------------------</td>
<td>----------------------------</td>
<td>-------------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>17 Neighborhood Support</td>
<td>To provide non-profit organizations with funds to administer public service contracts that support low to moderate income residents of Denver.</td>
<td>CDBG $800,000</td>
<td>700 individuals</td>
<td>05 Assorted - LMC: DHA Adult Employment &amp; Training Mi Casa- Resource Center (Park Hill) Year One Inc. MHYC Mile High Ministries Lutheran Social Services of CO Servicios de La Raza Southwest Improvement Council (SWIC) Florence Crittenton Services</td>
</tr>
<tr>
<td>18 2018 - 2020 City of Denver COH18F001 (Denver Colorado Health Network) 2019 Contract</td>
<td>To provide DCAP with funds to administer programs for persons with HIV/AIDS</td>
<td>HOPWA $1,414,306</td>
<td>1,112 households</td>
<td>Project Sponsor TBRA, STRMU, PHP Supportive Services</td>
</tr>
<tr>
<td>19 2018 - 2020 City of Denver COH18F001 (The Empowerment Program) 2019 Contract</td>
<td>To provide funds for supportive services for persons living with HIV/AIDS</td>
<td>HOPWA $86,490</td>
<td>68 households</td>
<td>2018 - 2021 Supportive Services COH18F001 (Empowerment) 2019 Contract</td>
</tr>
<tr>
<td>20 2018 - 2020 City of Denver COH18F001 (Visiting Nurse Association) 2019 Contract</td>
<td>To provide funds for supportive services for persons with HIV/AIDS</td>
<td>HOPWA n/a</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td>21 HESG Homeless Prevention</td>
<td>To provide funds for homelessness prevention, rapid re-housing, and shelter operations/improvements</td>
<td>HESG $582,032</td>
<td>20,190 people</td>
<td>Admin; Prevention; Rapid-rehousing; Shelter</td>
</tr>
<tr>
<td>22 Reserved for New Projects</td>
<td>This is a placeholder if the City funds a new project not currently listed in the 2019 Action Plan.</td>
<td>HOME $1,047,655</td>
<td>TBD</td>
<td>TBD</td>
</tr>
</tbody>
</table>
AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Denver, and the metro region, has invested significantly in increasing transportation mobility and community access. While this accessibility serves persons and households of all income levels, low and moderate-income households can still experience limited access to a variety of services and amenities in their neighborhood and community. Further, existing areas where safe, affordable market provided housing is concentrated in a few neighborhoods. Denver is seeking to expand the locations of safe, affordable housing throughout the city, but specific service needs and gaps are still concentrated.

In 2014, Denver completed a Community Needs Assessment on specific known neighborhoods of need, including: Westwood, Sun Valley, Globeville, Elyria, Swansea, North East Parkhill and Montbello. In 2016 and through additional analysis since, our review has expanded the number of neighborhoods of need further. Additional neighborhoods include Clayton, East Colfax, West Colfax, and the central west side neighborhoods.

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
</table>

Table 58 – Geographic Distribution

Rationale for the priorities for allocating investments geographically

In 2014, OED conducted a community needs assessment to ensure community and neighborhood development needs are being accurately addressed with City funding. In 2016, OED began working on anti-displacement strategies to help neighborhoods in mitigating effects of gentrification. Through these analyses, OED has identified that resources need to be geared towards these neighborhoods. Although a specific amount of funds will not be directed solely to these neighborhoods, priority consideration will be given to activities and programs that serve these neighborhoods. OED has deployed strategies to help make greater impacts for Denver’s underserved neighborhoods – through leveraged and partner investments. This information and priorities are being updated currently both through analysis and outreach efforts.
Discussion

Please see map below for identified neighborhoods.
Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Affordable housing is critical to Denver’s success. Today over 100,000 more people live here than in 2000, with as many as 100,000 more people anticipated to move here over the next decade. Yet housing stock has not kept pace with community needs. The gap is troubling: home prices are strong and growing, which is generally good news for a City’s economy, but prices make housing difficult to afford for many. Mayor Hancock’s 2013 challenge to create, rehab or preserve at least 3,000 affordable units in five years was met in four years by the work of the City with strategic collaboration with cross-sector partnerships. Yet additional housing needs exist and the City is continuing to work on this priority.

The Denver 2019-2023 Consolidated Plan identifies priorities that are intended to address affordable housing needs in Denver. The priority needs and objectives were developed based on the findings from both quantitative research (Housing Market Analysis) and qualitative research (public meetings, citizen survey and stakeholder meetings). The priority housing needs were determined based on the rental market gap, the number of households who were cost-burdened, living in substandard and overcrowded conditions, and/or who could not afford homeownership.

In 2019, Denver will undertake several activities to address a wide range of housing needs including affordable rental and for-sale housing development; public housing; homelessness; special needs housing, particularly for seniors and those with Severe and Persistent Mental Illness (SPMI); housing needs of those with AIDS/HIV; and neighborhood stabilization efforts including foreclosure prevention, intervention, and stabilization.

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 59 - One Year Goals for Affordable Housing by Support Requirement

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 60 - One Year Goals for Affordable Housing by Support Type
Discussion

The one-year goals are based on completion of activities including both federal and non-federal funding. New funding with current year entitlement is less likely to produce units during the year due to complex pre- and post-development schedules. The Special-Needs category is a representation of our HOPWA Program (280) and our Rental Housing and Access Modification Program (22).
AP-60 Public Housing – 91.220(h)

Introduction

Actions planned during the next year to address the needs to public housing

DHA exercises two approaches to address the needs in public housing which are preservation and new development/production.

**Preservation:** DHA manages a portfolio of 3,797 public housing units. The public housing units are a mix of row-type, high-rise, single family, duplex, triplex, four-plex, and multi-plex units located throughout the City and County of Denver’s jurisdictional boundaries.

As outlined in the Capital Fund 5-Year Plan, DHA will implement its modernization program for its 1,123 dispersed housing units to bring the units up to a 20 year life cycle, increase energy efficiency and make the units more marketable.

**New Development/Production:** Under the HUD Choice Neighborhoods Initiatives- DHA is revitalizing Sun Valley Homes and Sun Valley Annex as a transit-oriented development (TOD) site and planned community revitalization. DHA received a $30,000,000 Choice Neighborhoods Planning Grant to implement the Transformation Plan for the Sun Valley development and the surrounding neighborhood into a healthy, sustainable mixed-use, mixed-income, TOD neighborhood by increasing density from 333 to 700-mixed income housing, sustainable housing, improvement to the street grid, open space with a river park, a youth and family hub to provide essential education, employment and training activities and sustainability through the Eco-district protocol.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Denver Housing Authority’s Resident and Community Services Department (RCS) offers programs to housing authority residents that encourage and promote self-sufficiency and upward mobility. The programs, Family Self Sufficiency Program (FSS), Homeownership Program, ROSS Service Coordinator Programs, and employment programming, strive to provide resources to residents to empower them to become self-sufficient. These efforts culminate, in many situations, with home ownership. As a HUD Approved Counseling Agency, DHA provides homeownership counseling, foreclosure prevention, and financial fitness and homeownership education to the public.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

See above.
AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Emergency Solutions Grant funds will be one of the sources used to address the needs of homeless persons and persons with special needs. Through a Request for Proposal, nonprofit agencies will be funded for providing services in 4 primary categories: Emergency Shelter and Operations Homeless Prevention Activities, Homeless Prevention Activities; Rapid Re-housing and Stabilization and HMIS data collection and reporting. In addition to ESG funds, CDBG funds will be used to provide support services to the homeless and other persons with special needs. HOME funds will also be used for Tenant Based Rental Assistance and new housing development will include units for formerly homeless households where possible.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Denver, through Denver’s Road home, contracts with a small group of homeless service providers to fund the Denver Street Outreach Collaborative (DSOC). This team of street outreach workers is comprised of staff from Colorado Coalition for the Homeless (chronic, veterans, families), Urban Peak (youth), St Francis Center (chronic), and Salvation Army (Chronic, veterans). In addition, members from the Denver Police Homeless Outreach Team and the Veterans Affairs outreach team participate as members of the DSOC. All members of the DSOC are trained in administering the VI-SDPAT assessment tool to help assess for vulnerability and match to appropriate housing interventions. In addition, the DSOC brings collective decades of work & expertise to the task of reaching people where they are at and engaging them in services with no precondition to come inside. These services have grown to include mobile medication management & services, search & rescue, and behavioral health services.

The Department of Human Services, through its CORE Division, also provides a team of outreach workers to work within shelters & day centers – so that families and individuals experiencing homelessness can be encouraged to apply for mainstream benefits, such as TANF, food stamps, Medicaid, Old Age Pension, Aid to Needy and Disabled, as well as child care assistance – without needing to arrive to a DHS building.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Denver invests into the emergency and transitional needs of people experiencing homelessness, primarily through the Denver’s Road Home program. DRH has been engaged with OneHome, the regional Coordinated Entry to Housing system for several years to help provide exits from shelter into permanent housing, and a more coordinated path to appropriate housing for people experiencing homelessness. DRH has provided leadership for a new shelter strategy in Denver – whereby shelter providers are shifting from a paradigm of providing crisis services, to a paradigm of
providing shelter services that facilitate a tailored, sustainable path out of homelessness for each shelter guest.

For single men, women and transgender guests – emergency shelter needs are met through a network of non-profit partners, with a capacity of serving nearly 1600 guests per night. The City helps provide funding to these programs, as well as assistance with costs to transport guests to shelter each night. For families, in addition to a network of family shelter providers, Denver Human Services provides funding for emergency motel vouchers – with a capacity of serving approx. 26 families per night.

Transitional Housing is provided by several non-profit partners – many of which do not receive government funding for their services.

In addition to the transitional housing model, several community partners (including DRH) are adopting transition in place models, and are increasing investments into rapid re-housing to stabilize families as quickly as possible.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

City of Denver and Denver’s Road Home staff consistently meet with Metro Denver Homeless Initiative/CoC and homeless service providers to assess the demands for service and whether the current housing resources are meeting them. For example, planning for severe weather, especially in winter, may require the community to negotiate with shelters and the faith community to explore expansion of emergency shelter capacity. Prioritizing Rapid Re-Housing and prevention programs will help ensure focused resources—including case management—are available for homeless families and individuals. In recent years, The City has more than doubled investments into Rapid Rehousing, both through ESG programs, and through tax-funded programs via DRH.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The City of Denver has a few core programs that are focused on homeless prevention. These include the DEDO Temporary Rental and Utility Assistance Program (TRUA) and the DHS Homeless Prevention Programs, as well as number of ESG funded prevention programs whereby DHS contracts with non-profit programs to administer prevention dollars & services. The homeless prevention activities funded by the ESG program, specifically, the rental and mortgage payment assistance to prevent eviction and
foreclosure will help to preserve affordable housing for those at risk of homelessness. Additionally, DHS has piloted a program to ensure that residents facing eviction are represented in court – and provided eviction prevention resources on the spot.

Discussion

See above.
AP-70 HOPWA Goals - 91.220 (l)(3)

<table>
<thead>
<tr>
<th>One year goals for the number of households to be provided housing through the use of HOPWA for:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family</td>
<td>100</td>
</tr>
<tr>
<td>Tenant-based rental assistance</td>
<td>100</td>
</tr>
<tr>
<td>Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds</td>
<td>0</td>
</tr>
<tr>
<td>Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>200</td>
</tr>
</tbody>
</table>
AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Section MA-40 and SP-55 discussed the impact of public policies on affordable housing and residential investment in detail. The greatest challenge to affordable and residential development continues to be neighborhood resistance. Some of the initial updates to the city’s code were softened based on neighborhood feedback, particularly placement of ADUs and missing middle products. Many neighborhoods have used growth—perceived or real increases in traffic congestion—to effectively fight rezoning requests that would add density to the city. Through expansion of the city’s Neighborhood Planning Initiative (NPI) process, the city hopes to better balance neighborhood concerns with growth demands in the future.

Market conditions also create significant barriers to affordable housing throughout the city. Though there has been consistent residential development over the past five years, this development has largely responded to the influx of higher income renters into the city and, other than through developments with density bonuses or public subsidies, has not added to the inventory of affordable housing. Continued in-migration of young workers to the city has exacerbated rising rents and home values while development struggles to keep pace and to accommodate low- and moderate income residents.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

_Housing an Inclusive Denver_ establishes four core goals to guide the City’s affordable housing strategies over the next five years, which also aim to reduce the barriers to affordable housing. The long-term goals to reduce barriers are described in SP-55. Specific actions for the 2019 program year include the following:

- Development and preservation of affordable housing;
- Tenant based rental assistance;
- Single family/emergency rehabilitation;
- Down payment assistance;
- Tenant landlord counseling;
- Implementation of year one Regional AI goals including analysis of existing accessible rental units and creation of accessible housing database, exploration of a rental registry, exploration of preference policies for residents at risk of displacement, and implementation of Denver’s new policy to prevent discrimination on the basis of source of income.
Discussion:

See above.
AP-85 Other Actions – 91.220(k)

Introduction:

The City and County of Denver along with other partnership agencies will continue to develop programs and initiatives, designed to improve existing programs, and identify additional sources of funding to better serve those in need of affordable housing and related services.

Actions planned to address obstacles to meeting underserved needs

The 2018-2022 Denver Housing Plan, *Housing an Inclusive Denver*, is appended to this Action Plan. Among the Housing Plan recommendations are to create affordable housing in vulnerable areas, preserve affordability and housing quality, promote accessible housing options, and stabilize residents at risk of involuntary displacement. In addition, as discussed previously, Denver completed its housing plan to address barriers and regularly evaluates barriers to affordable housing development; this effort will continue. The City also completed its required Analysis of Impediments (AI) that further addresses barriers specifically to Denver residents.

Actions planned to foster and maintain affordable housing

As outlined in *Housing an Inclusive Denver*, the City will remain focused on the creation and preservation of affordable housing in Denver. Specifically, the priorities of the plan are to create affordable housing in vulnerable areas, preserve affordability and housing quality, promote accessible housing options, and stabilize residents at risk of involuntary displacement. These priorities were also captured in the City's priorities for housing development funding in the Notice of Funding Availability (NOFA) published for 2019.

Actions planned to reduce lead-based paint hazards

The Denver Department of Public Health and Environment (DDPHE), the Mayor's Office, Denver Housing Authority (DHA) and OED are actively collaborating on the Safe and Healthy Homes Initiative to eliminate lead-based paint hazards in ten years. Through its collaborative effort, the City is embarking on a detailed census and inventory of potential lead-based hazard areas. Additionally, in 2017 DDPHE applied for and was awarded a Lead Grant from the Office of Lead Hazard Control and Healthy Homes.

OED is also a member of the Colorado Lead Coalition. The Coalition is made up of a number of agencies and represented by over 40 members from various government agencies, non-profits, and industry. The current active agencies include: Colorado Department of Public Health and Environment/CDPHE, Colorado Department of Health Care Policy and Financing/HCPF, U.S. Environmental Protection Agency/EPA, U.S. Department of Housing and Urban Development/HUD, Denver Department of Public Health & Environmental 

DDPHE, Rocky Mountain Poison and Drug Center, OED, Colorado Division of Housing (DOH), Denver Housing Authority, Denver Health, Children's Hospital Colorado, and Denver Water. The Coalition is a dedicated and diverse group of environmental and housing professionals from...
various organizations who draw on their respective backgrounds to fulfill the Coalition’s Strategic Plan. The Plan includes goals and strategies in education and outreach, blood lead testing, housing, and regulations.

**Actions planned to reduce the number of poverty-level families**

The City and County of Denver is committed to carrying out a comprehensive anti-poverty strategy in collaboration with the many community and nonprofit organizations that also serve Denver’s low-income population, including DHA, Volunteers of America, Catholic Charities, Colorado Coalition for the Homeless, and Denver Rescue Mission, among others. The City has also implemented an aggressive collaborative effort to eradicate homelessness in Denver through its Road Home program.

The City’s CDBG, HOME, ESG, HOPWA and other federal grants will continue to support programs and organizations that provide assistance and economic opportunities for low- and moderate-income persons and for populations with special needs. Funds will continue to be used to support subsidized housing, food and healthcare programs, emergency services and literacy and job training programs.

The City and other agencies will continue to collaborate in pooling necessary resources to assist individuals and families with obtaining the tools to overcome poverty.

**Actions planned to develop institutional structure**

The City and County of Denver has a strong institutional structure through which its programs for housing and community development are delivered. In 2019, the city anticipates improving its current method of program delivery and administration with respect to housing services, by creating a stand-alone department to address housing and homelessness needs together. By serving the entire continuum of housing needs in one department, the City hopes to provide more effective and efficient service to the residents of Denver seeking housing assistance. Neighborhood and business services will continue to be offered through Denver Economic Development & Opportunity. The city intends to continue to work toward making improvements to its system of program delivery as needs are identified (please see the efforts to enhance coordination below).

**Actions planned to enhance coordination between public and private housing and social service agencies**

The City hosted its Annual Regional Housing Summit in April 2019 to bring partners together to address affordable housing and other housing related issues that affect the entire state. This summit is anticipated to be held annually to address regional housing issues. Additionally, further efforts are being made with an evaluation of how to better align funding applications and compliance functions for housing in Denver with those of CHFA and the State Division of Housing (DOH). The City will also continue to foster positive working relationships with its many community development corporations and nonprofits that assist special needs populations and persons who are homeless. The Mayor’s
Housing Advisory Committee continues to meet and has broad representation from all partners in the housing and development fields, including private sector developers and real estate agents, public agencies, lenders, nonprofit housing providers and service providers to persons who are homeless. These individuals, in addition to others, as needed, will continue to serve in an advisory role to the Mayor.

**Discussion:**

See above.
Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

The City of Denver adheres to all specific CDBG, HOME, and ESG requirements as specified below.

**Community Development Block Grant Program (CDBG)**

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed
   - 0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee’s strategic plan
   - 0
3. The amount of surplus funds from urban renewal settlements
   - 0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
   - 0
5. The amount of income from float-funded activities
   - 0
Total Program Income
   - 0

**Other CDBG Requirements**

1. The amount of urgent need activities
   - 0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.
   - 70%

**HOME Investment Partnership Program (HOME)**

Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

   The City will permit HOME funds to be invested as loans, grants, deferred payment loans, and other types of investment permitted by the regulations described in 92.205(b). The City will not permit other forms of investment without the prior approval of HUD.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used
for homebuyer activities as required in 92.254, is as follows:

The following resale requirement is based on a fair return on investment. A fair return on investment is calculated as follows:

(a) Start with the Prior Purchase Price paid for the MPDU;
(b) For each year from the date that the selling Owner acquired the MPDU multiply the selling Owner’s Prior Purchase Price by the percentage change over the prior year in the Standard and Poor’s Case/Shiller Index up to a maximum increase for any given year of three and a half percent (3.5%). Each year’s percent increase is added to the Prior Purchase Price and is not compounded from year to year. In years where the Standard and Poor’s Case/Shiller Index decreases, there shall be no adjustment to decrease the Prior Purchase Price of the MPDU;
(c) For each year add the product of the multiplication described in (b) above to the selling Owner’s purchase price;
(d) Add the costs of Eligible Capital Improvements that have been approved by OED up to the time of Transfer;
(e) Add the amount of the sale commission paid by the Owner; provided that such amount does not exceed the maximum allowable sales commission published by OED on an annual basis;
(f) Add any accrued negative amortization if the MPDU was financed with a graduated payment mortgage by: an income, as published by HUD.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Resale restrictions in keeping with § 92.254 of the HOME rule are imposed upon newly constructed for-sale housing. The City uses the recapture method for down payment assistance loans. In accordance with § 92.254 of the HOME rule, the method of recapture of these funds will be through loan repayment by the borrowers of the entire amount of the HOME investment through sale or conveyance of the property that previously received the HOME investment, subject to available Net Proceeds. Net Proceeds is defined as the Sales Price minus the Superior non-HOME debt minus Closing Costs.

Fair Return on Investment Definition: If a homeowner sells the subject property at any time during the contractually obligated HOME Resale Affordability Period, the City of Denver, will establish a standard of fair return as a percentage of the change in median sales prices over the period of ownership based on comparable sales in the vicinity (neighborhood) of the subject property. The city’s policy determines that a fair return to the seller would be their initial out of pocket investment plus the cost of documented eligible upgrades, such as installation of new 90% efficiency furnace, new E-star rated windows and additions to the homes square footage, plus 50% of the remaining net proceeds available after the City recovers the initial down payment and closing cost subsidy.
The City of Denver considers that a reasonable range of low-income eligible buyers would be in the 0-80% median income range. In order to ensure affordability for the next buyer of the HOME Resale property, the City of Denver may provide down payment or second mortgage assistance, first mortgage interest write downs or other mechanisms that enhance affordability, assuming that these programs still exist in their current form at the time of the resale activity.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Refinancing. Refinancing for multi-family projects is an eligible activity if it is necessary to permit or continue affordability for a targeted population under HUD HOME program Section 92.206. Refinancing will be allowed citywide under the following guidelines:

- The minimum affordability period shall be 15 years;
- Multi-family loans made or issued by any federal program are ineligible for refinancing;
- Rehabilitation must equal at least 25 percent of the total project costs; and
- Project management practices will be reviewed to ensure that disinvestment in the property has not occurred and that the long-term needs of the project can be met.

Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards for providing ESG assistance are attached as an appendix.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Denver Human Services, in partnership with Metro Denver Homeless Initiative (MDHI), Continuum of Care (CoC), manages an established central intake and coordinated assessment system using Vulnerability Index - Service Prioritization and Decision Assistance Tool (VI-SPDAT). The VI-SPDAT helps determine chronically homeless and medical vulnerability and prioritizes housing and service recommendations.

VI-SPDAT helps identify the best type of support and housing intervention for an individuals or family by relying on three categories of recommendations:
• Permanent Supportive Housing: Individuals or families who need permanent housing with ongoing access to services and case management to remain stably housed.

• Rapid Re-Housing: Individuals or families with moderate health, mental health and/or behavioral health issues, but who are likely to be able to achieve housing stability over a short time period through a medium or short-term rent subsidy and access to support services.

• Affordable Housing: Individuals or families who do not require intensive supports but may still benefit from access to affordable housing. In these cases, the tool recommends affordable or subsidized housing but no specific intervention drawn uniquely from homeless services providers.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations). Denver Human Services (DHS) coordinates with Metro Denver Homeless Initiative (MDHI) Continuum of Care (CoC) to prioritize ESG objectives. Currently this includes Rapid Re-Housing, Homeless Prevention, Essential Services/Operations, HMIS, and Administration. These priorities are evaluated annually and take into account standardized performance standards and outcomes. DHS issued a Request for Proposals (RFP) for the ESG program in 2013 with the intent of providing multi-year funding in making sub-awards. With the exception of Administration all of the ESG sub-awards are made to community based and faith based organizations.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

City of Denver meets the homeless participation requirement in 24 CFR 576.405(a). Denver Human Services consults with each agency receiving ESG funds to ensure homeless participation in services.

5. Describe performance standards for evaluating ESG.

DHS/DRH continues to be committed to Homeless Management Information System (HMIS). All ESG recipients participate in HMIS and continued analysis is expected to provide real time data to evaluate the impact of programs. CoC performance standards are outlined in the attached appendix. Program and agency refunding is dependent, in part, on successfully meeting the standards.

Discussion:
AP90 HOPWA: Method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations) (Due to a system error, this element is omitted from the template. HOPWA grantees should therefore add a text box at the end of this screen to enter this information.)

The City publishes an annual Notice of Funding Availability (NOFA) to select public service providers, including a project sponsor for HOPWA. It is a competitive process that accepts applications from any organization interested in applying for that role, including faith-based and other community organizations.

Appendix - Alternate/Local Data Sources

1. Data Source Name
   Consolidated Plan Stakeholder Survey 2018

   List the name of the organization or individual who originated the data set.
   Root Policy Research, the city's consultant for the 2019-2023 Consolidated Plan, developed the survey instrument to distribute to stakeholders.

   Provide a brief summary of the data set.
   The survey asked stakeholders about Denver’s most pressing housing and community development needs and potential solutions to address those needs.

   What was the purpose for developing this data set?
   To gather stakeholder input for the Consolidated Plan and inform development of the 5-year strategies and annual allocation of block grant funds.

   Provide the year (and optionally month, or month and day) for when the data was collected.
   September 2018 through January 2019

   Briefly describe the methodology for the data collection.
   Online survey instrument (Survey Monkey).

   Describe the total population from which the sample was taken.
   Denver regional stakeholders.

   Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
   Denver regional stakeholders.

2. Data Source Name
   2017 American Community Survey
<table>
<thead>
<tr>
<th><strong>List the name of the organization or individual who originated the data set.</strong></th>
<th>U.S. Census Bureau.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Provide a brief summary of the data set.</strong></td>
<td>U.S. Census annual survey of a sample of households.</td>
</tr>
<tr>
<td><strong>What was the purpose for developing this data set?</strong></td>
<td>The federal government uses the data for a variety of purposes, including the allocation of U.S. Department of Housing and Urban Development (HUD) block grant funds to entitlement cities and states.</td>
</tr>
<tr>
<td><strong>Provide the year (and optionally month, or month and day) for when the data was collected.</strong></td>
<td>Data represent households in 2017.</td>
</tr>
<tr>
<td><strong>Briefly describe the methodology for the data collection.</strong></td>
<td>Methodology can be found at: <a href="http://www.census.gov/acs/www/methodology/methodology_main/">http://www.census.gov/acs/www/methodology/methodology_main/</a></td>
</tr>
<tr>
<td><strong>Describe the total population from which the sample was taken.</strong></td>
<td>The sample size for the 2017 ACS for Denver is not available on the ACS website.</td>
</tr>
<tr>
<td><strong>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</strong></td>
<td>Households, persons and housing units representative of the City and County of Denver.</td>
</tr>
</tbody>
</table>

3

<p>| <strong>Data Source Name</strong> | DHA Data |
| List the name of the organization or individual who originated the data set. | Denver Housing Authority (DHA). |
| <strong>Provide a brief summary of the data set.</strong> | Internal data on DHA programs and residents assisted by DHA. |
| <strong>What was the purpose for developing this data set?</strong> | Internal planning and external reporting. |
| <strong>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</strong> | Representative of DHA clients. |
| <strong>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</strong> | 2018. |
| <strong>What is the status of the data set (complete, in progress, or planned)?</strong> | Data are continually updated as residents change. |</p>
<table>
<thead>
<tr>
<th></th>
<th><strong>Data Source Name</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Various published local reports; see PR-10 for details</td>
</tr>
</tbody>
</table>

**List the name of the organization or individual who originated the data set.**

**Provide a brief summary of the data set.**

**What was the purpose for developing this data set?**

**How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?**

**What time period (provide the year, and optionally month, or month and day) is covered by this data set?**

**What is the status of the data set (complete, in progress, or planned)?**
Denver Human Services
Q & A Emergency Solutions Grant

October 3, 2018

What is the funding cycle?

• Contracts will be executed for one-year terms. The first term will be January 1, 2019 to December 31st, 2019. Continuation of funds will depend on program performance and availability of federal funds.

What is the funding ceiling?

• DHS was awarded $569,662. We anticipate five to eight sub-awards. There is no ceiling max for applications.

What is the definition of Emergency Shelter?

• The HUD definition for Emergency Shelter is: any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter under a Fiscal Year 2010 Emergency Solutions grant may continue to be funded under ESG.

Can ESG RRH pay for rent in the arrears?

• The maximum length of time a program participant may receive rental assistance through ESG is 24 months during any three-year period. Short-term rental assistance is for up to three (3) months of rent. Medium-term rental assistance is for more than three (3) months, but not exceeding 24 months. Payment of rental arrears consists of a one-time payment for up to six (6) months of rent in arrears, including any late fees on those arrears. The limit of up to 24 months of payments must include the arrears payments. For example, if a participant receives assistance for six (6) months of rental arrears payments, the maximum amount of monthly rental assistance they may receive is 18 months.

• For more information: HUD AAQ: https://www.hudexchange.info/faqs/1061/what-are-the-limits-on-rental-assistance-provided-through-esg-for/

Do subgrantees have to follow MDHI’s RRH standards?

• Yes, all programs must be in coordination with MDHI’s RRH Written Standards

• Here is a link to the standards: https://d3n8a8pro7vhmx.cloudfront.net/mdhi/pages/234/attachments/original/1533321359/RRH_Standards_Denver_FINAL.pdf?1533321359

What is the proposal narrative limit length?

• There was a typo in the RFP. The max limit length of each activity is six (6) pages. IF you are submitting an application for both activities (Emergency Shelter AND Rapid Re-Housing) the max is 12 pages total. If you are only submitting an application for one activity the page limit is six (6) pages
When is the anticipated award date?

- October 23 is the anticipated award date.

What constitutes as match?

- Matching Funds: Identify an amount equal to or greater than the requested amount of ESG funds. The amount of these supplemental funds may include the value of any lease on a building; any salary paid to staff in carrying out Emergency Solutions Grant Program activities; and the time and services contributed by volunteers to carry out the program based upon a $24.69 per hour rate, in kind donations, shelter partnership or food bank contributions to the program. Special consideration will be given to volunteers who possess unique skills (i.e. psychiatric evaluation). In the event of such services it is asked that a fair market rate for these services be listed on this form. Funds must be contributed to and used by the ESG funded program for ESG eligible activities between January 1, 2019 and December 31, 2019.

- Non-Federal Match Requirement: Non-federal match requirements are detailed on page 44 and 45 of the RFP.

What if our current insurance limits aren’t consistent with the insurance requirements of the RFP?

- If your organization is awarded ESG funds your organization will be required to obtain insurance consistent with the stated requirement on page 48 of the RFP.

Are funds for Denver residents only?

- Yes.

What is the definition of case management?

- 24 CFR 576.102 defines Emergency Shelter case management as:
- The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:
  - (A) Using the centralized or coordinated assessment system as required under § 576.400(d);
  - (B) Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility;
  - (C) Counseling;
  - (D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
  - (E) Monitoring and evaluating program participant progress;
  - (F) Providing information and referrals to other providers;
  - (G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
  - (H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.
Why is Homeless Prevention not an allowable activity though RFP FS/CS/ESG19?

- Prevention funds were not an allowable expense at any point during this RFP. There was a reference made to Homeless Prevention when the RFP was released, this was an oversight. There was never a section of the RFP dedicated to Homeless Prevention in this RFP.

- ESG is a HUD program. HUD has been deemphasizing the use of Prevention over the last several years and concentrating on Rapid Re-Housing. DHS coordinates the ESG with Metro Denver Homeless Initiative, as required by HUD. The decision was made collaboratively with MDHI to discontinue Prevention Services with City ESG funds, and reallocate those funds to Rapid Rehousing.
Citizen Participation Comments

Appendix A. Consolidated Plan Public & Stakeholder Consultation
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Input from Community Meetings and Public Hearings ..................... A–33
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APPENDIX A.
CONSOLIDATED PLAN: PUBLIC AND STAKEHOLDER CONSULTATION
APPENDIX A.
Consolidated Plan: Public and Stakeholder Consultation

Public consultation for the development of the City and County of Denver 2019-2023 Five-year Consolidated Plan included community meetings, a stakeholder survey, interviews with stakeholders, a focus group with people experiencing homelessness, and a public hearing during the 30-day public comment period. In addition, the Consolidated Plan incorporates extensive community engagement gathered through the 2018 Regional Analysis of Impediments to Fair Housing Choice.

This section summarizes the results of the engagement efforts conducted specifically for the Consolidated Plan. Engagement efforts for the AI are presented in Appendix B. Findings from all community engagement efforts are also incorporated throughout the Market Analysis and Needs Assessment sections of the Con Plan and were considered in the development of the Strategic Plan and Action Plan.

Findings from Stakeholder Interviews and Survey

This section presents the findings from the interviews and survey that were conducted for the Consolidated Plan. These findings were used in the development of five-year goals, priorities and projects; were measured against the proposed PY2019 Action Plan; and will be considered in future action plans.

Industry/organization and demographics of respondents.

Stakeholder Interviews Representatives from the following organizations participated in one-on-one stakeholder interviews:

- Denver Workforce Development Board,
- Downtown Denver Partnership,
- Wells Fargo,
- Colorado Housing and Finance Authority,
- Open Media Foundation
- Colorado Division of Housing
- Metro Denver Homeless Initiative
- Bayaud Enterprises,
- Denver Rescue Mission
- Mile High Community Loan Fund
- Dish Network
- City Denver Emergency Operations Center (EOC), a function of the Office of Emergency Management
Stakeholder Survey  Nearly 300 stakeholders, representing a wide range of industries and clients, responded to the online survey between November 2018 and February 2019. Figure A-1 presents the types of industries and organizations represented by stakeholder respondents. The greatest proportions of respondents provide services to low income residents and persons with disabilities. Respondents represent the public, private, and nonprofit sectors.

Figure A-1. Type of Industry/Organization Represented by Stakeholder Respondents

<table>
<thead>
<tr>
<th>Type of Industry/Organization</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless services</td>
<td>21%</td>
</tr>
<tr>
<td>Services for low income residents</td>
<td>21%</td>
</tr>
<tr>
<td>Education</td>
<td>20%</td>
</tr>
<tr>
<td>Other (please specify)</td>
<td>20%</td>
</tr>
<tr>
<td>Human services</td>
<td>17%</td>
</tr>
<tr>
<td>Advocacy and/or legal services</td>
<td>16%</td>
</tr>
<tr>
<td>Multifamily development</td>
<td>15%</td>
</tr>
<tr>
<td>Services for youth</td>
<td>14%</td>
</tr>
<tr>
<td>Services for persons with disabilities</td>
<td>13%</td>
</tr>
<tr>
<td>Property management</td>
<td>13%</td>
</tr>
<tr>
<td>Services for seniors</td>
<td>12%</td>
</tr>
<tr>
<td>Economic development</td>
<td>12%</td>
</tr>
<tr>
<td>Fair housing</td>
<td>11%</td>
</tr>
<tr>
<td>Services for refugees and/or immigrants</td>
<td>11%</td>
</tr>
<tr>
<td>Own rental property</td>
<td>11%</td>
</tr>
<tr>
<td>Government (local, state, federal)</td>
<td>10%</td>
</tr>
<tr>
<td>Business owner/manager</td>
<td>9%</td>
</tr>
<tr>
<td>Services for persons with drug or alcohol...</td>
<td>9%</td>
</tr>
<tr>
<td>Services for veterans</td>
<td>8%</td>
</tr>
<tr>
<td>Services for persons with HIV/AIDS</td>
<td>7%</td>
</tr>
<tr>
<td>Regional planning</td>
<td>6%</td>
</tr>
<tr>
<td>Land use planning</td>
<td>5%</td>
</tr>
<tr>
<td>Lending</td>
<td>5%</td>
</tr>
<tr>
<td>Residential sales</td>
<td>4%</td>
</tr>
<tr>
<td>Food pantry/provision</td>
<td>4%</td>
</tr>
<tr>
<td>Homeownership counseling or services</td>
<td>4%</td>
</tr>
<tr>
<td>Services for businesses</td>
<td>4%</td>
</tr>
<tr>
<td>Public housing authority</td>
<td>4%</td>
</tr>
<tr>
<td>Criminal justice</td>
<td>2%</td>
</tr>
<tr>
<td>Language access services</td>
<td>2%</td>
</tr>
<tr>
<td>Environmental justice</td>
<td>2%</td>
</tr>
<tr>
<td>Insurance</td>
<td>1%</td>
</tr>
<tr>
<td>Transit provider</td>
<td>1%</td>
</tr>
</tbody>
</table>

Note: n=292. Numbers add to greater than 100 percent due to multiple responses.

Community development needs. The first section of the survey asked stakeholders about their perception of community development needs. This portion of the survey focused on issues related to public services and economic development needs in the community. Housing/homelessness needs and needs related to institutional capacity are discussed later in this section.

The greatest public service and economic development needs in Denver identified in the survey and in stakeholder interviews are related to childcare, youth activities, transportation, job training and other programs for low income residents, and support for nonprofits and small businesses in the community.

Greatest unmet community development needs in Denver. Figure A-2 shows stakeholder perspectives on the greatest unmet community development needs in the city. The top five responses across all categories were:

- Affordable child care (67%);
- Access to efficient and reliable public transportation for all Denver neighborhoods (53%);
- Access to affordable public transportation for low income residents (36%);
- Job training programs (35%); and
- Support services for low income residents (35%).

The most common unmet needs related to small business and non-profit capacity were assistance identifying loan/grant opportunities, low cost loans, and business plan development.

Identified needs related to public facilities and infrastructure were sidewalks, parks/community centers, and senior centers.

Of those who indicated that support services for low income residents is an unmet need, respondents most frequently specified affordable housing as the support service needed.

A stakeholder also notes that “there are many services available for low-income residents, however, the income requirements are too low and don’t effectively address the needs for those who make too much to qualify for public assistance.”
Figure A-2. Greatest unmet community development needs in Denver

<table>
<thead>
<tr>
<th>Category</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable child care</td>
<td>67%</td>
</tr>
<tr>
<td>Support services for low income residents</td>
<td>35%</td>
</tr>
<tr>
<td>Youth activities</td>
<td>35%</td>
</tr>
<tr>
<td>Job training programs</td>
<td>23%</td>
</tr>
<tr>
<td>Infrastructure for high speed/broadband Internet access</td>
<td>11%</td>
</tr>
<tr>
<td>Access to Internet for low income residents</td>
<td>10%</td>
</tr>
<tr>
<td>Access to efficient and reliable public transportation for all Denver neighborhoods</td>
<td>53%</td>
</tr>
<tr>
<td>Access to affordable public transportation for low income residents</td>
<td>36%</td>
</tr>
<tr>
<td>Access to affordable public transportation for seniors</td>
<td>16%</td>
</tr>
<tr>
<td>Access to affordable public transportation for persons with disabilities</td>
<td>11%</td>
</tr>
<tr>
<td>Access to efficient and reliable public transportation for seniors</td>
<td>9%</td>
</tr>
<tr>
<td>Access to efficient and reliable public transportation for persons with disabilities</td>
<td>7%</td>
</tr>
<tr>
<td>Energy efficiency and renewable energy services</td>
<td>21%</td>
</tr>
<tr>
<td>Sidewalks</td>
<td>14%</td>
</tr>
<tr>
<td>Parks and community centers</td>
<td>13%</td>
</tr>
<tr>
<td>Senior center</td>
<td>6%</td>
</tr>
<tr>
<td>Accessibility (ADA) improvements to public buildings</td>
<td>5%</td>
</tr>
<tr>
<td>Accessibility (ADA) improvements to community amenities (e.g., parks, trails)</td>
<td>5%</td>
</tr>
<tr>
<td>Parks in certain neighborhoods</td>
<td>5%</td>
</tr>
<tr>
<td>Street lighting</td>
<td>4%</td>
</tr>
<tr>
<td>Flood plain or other environmental hazard mitigation</td>
<td>2%</td>
</tr>
<tr>
<td>Identifying loan/grant opportunities</td>
<td>29%</td>
</tr>
<tr>
<td>Low cost loans for small businesses, start-ups, and non-profits</td>
<td>19%</td>
</tr>
<tr>
<td>Business plan development, entrepreneurship training</td>
<td>15%</td>
</tr>
<tr>
<td>Business skills development (e.g., accounting, software training)</td>
<td>9%</td>
</tr>
<tr>
<td>Market research, competitive intelligence, internet and social media strategy/SEO</td>
<td>7%</td>
</tr>
<tr>
<td>Do not know</td>
<td>1%</td>
</tr>
</tbody>
</table>

Note: n=94. Numbers add to greater than 100 percent due to multiple responses.
Figure A-3 shows how stakeholders rank the perceived greatest unmet needs by urgency of the needs. Urgent needs align, for the most part, with the greatest unmet needs, though youth activities jumps ahead of job training when ranking activities by urgency.

Respondents identify affordable child care (39%), access to efficient and reliable public transportation for all Denver neighborhoods (20%), access to affordable public transportation for low income residents (12%), youth activities (13%), and help for non-profits- identifying loan/grant opportunities (17%) as the top five most urgent unique unmet community development needs in Denver.

Stakeholders indicated that these urgent community development needs are most prevalent in low-income and immigrant communities. Specific neighborhoods and areas that were most frequently identified include Montbello, Elyria-Swansea, Globeville, West Denver, and East Colfax.

In interviews, stakeholders highlighted the growing issue of the shortage of skilled workers in construction trades and a need for skilled workers in all industries; the need for collaboration between various business sectors and the education system/training opportunities to connect students to future industries and to ensure that the proper skill sets are being cultivated; and the need for additional support for small businesses.

**Increasing the effectiveness of Denver’s community development programs.** Stakeholders provide a variety of advice on how the City can increase the effectiveness of its community development programs. Key stakeholder suggestions include efforts that focus on resident engagement, increased communication and collaboration, public-private partnerships, increased engagement with and funding to nonprofits, and the concentration of resources on low-income areas.

- **Focus on effective and meaningful resident engagement:**

<table>
<thead>
<tr>
<th>Top Five Most Urgent Community Development Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Affordable child care</td>
</tr>
<tr>
<td>2. Access to efficient and reliable public transportation for all Denver neighborhoods</td>
</tr>
<tr>
<td>3. Access to affordable public transportation for low income residents</td>
</tr>
<tr>
<td>4. Youth activities</td>
</tr>
<tr>
<td>5. Help for non-profits—Identifying loan/grant opportunities</td>
</tr>
</tbody>
</table>

Note: 
n=211.

“Actively listen to the community, engage them in process of community development.”

“Effectively reach out to residents by internet, on the ground survey- just TALK to multiple residents.”

“Improve grassroots efforts- knock on doors.”

“Meet with the individuals and communities most affected, with translators so people can express their opinions and share their ideas in their first language.”

- **Increase communication and collaboration with/between providers:**
  
  “Improved communication of services to allow for access.”
  
  “Development of a steering committee for collaboration. Stop the duplication of services and work together.”
  
  “Coordinate services to strengthen vulnerable communities by combining City programs.”
  
  “Cross-agency communication, data-sharing, and coordination.”
  
  “Strengthen partnerships where funding can also be leveraged.”

- **Develop public-private partnerships:**
  
  “Partner with private organizations for more efficient outcomes.”
  
  “Partner with private sector entrepreneurs to make sure business training will be well received in the marketplace.”
  
  “Reach out to more for-profit, private sector companies for these services. For-profit entities have the ability to make the community development services more efficient with the possibility of expanding the service base.”

- **Increase engagement with and funding to nonprofits:**
  
  “Directly ask the nonprofit executive directors who work in the key neighborhoods - what their priorities are and what would help them serve more residents.”
  
  “Provide funding to nonprofits who have track records and long histories with these communities, including allowing them to pay for staff who live in the neighborhood, regardless of their citizenship status. A lot gets done neighbor to neighbor.”
  
  “Support nonprofits- support more community-based services and programs for youth and low-income adults who are employable. Provide more city support and funding to City Commissions to support neighborhood organizations that "build Community" through outreach activities. This can create networks of people and strengthen the capacity of a community to develop economically.”
Concentrate resources in low-income neighborhoods:

- “Prioritize the neighborhoods in need to stabilize housing and equitable development.”
- “Don’t just cater to well off areas.”
- “Focus efforts on creating great vibrant places in areas that are falling behind. Low-income neighborhoods can develop as great places to live without displacement if local efforts are supported and there is emphasis on generating self-sustaining models.”

Interviewed stakeholders emphasized the need for more training that provides jobs and supports industries. It was suggested that the city collaborate further with the business community, especially small businesses, and offer additional outreach and support, potentially through business counselors, a small business toolkit, or a “311”-type hotline for business questions and needs. One stakeholder provided the feedback that the city business website is difficult to navigate, that the process of getting SBE/MBE/WBE designations is overwhelming for many business owners, and that support is generally only offered during business hours, when many small business owners are not available.

Stakeholders also noted a need for technical assistance and access to capital after the start-up phase; support is needed along the way and it would be helpful to provide information on capital available along all points of the continuum. One stakeholder suggested that perhaps a CDFI or nonprofit could partner with the City to provide additional small business training and assistance.

In addition, stakeholders expressed the need for specific supports for businesses in gentrifying neighborhoods, including connection with capital and resources; outreach on retaining culture and embracing the existing community; and mentoring and technical assistance on how to manage costs and stay relevant in a changing neighborhood. One stakeholder advocated that the concept of “gente”-rification be considered in areas of gentrification, focusing on keeping the people, culture, and tradition of the neighborhood in mind throughout changes.

Interviewed stakeholders were proponents of the concept of “economic gardening” in Denver—noting the need to maintain the current fabric of our economy, the City’s infrastructure, and the existing small business network while Denver continues to grow. Stakeholders also expressed the need to broaden the base of the economic activity in the City, especially as it relates to low- and moderate-income residents. One stakeholder noted the need to address the subtle barriers that keep people from thriving, such as barriers to entry into the job market.

Interviewed stakeholders had mixed opinions on the idea of allocating funds to be more geographically targeted. Many of the stakeholders felt that focusing resources on specific neighborhoods with needs would be beneficial, thus having greater impact and better
outcomes in the areas that need it most. Neighborhoods that were mentioned as being in need of targeted allocation of funding are: Curtis Park, Elyria-Swansea, Globeville, RiNo, Cole, Westwood, Five Points, Montbello, Far East (along Aurora border), Sunnyside, and the Morrison Road corridor. Other stakeholders were concerned that this targeting of funds would restrict support, noting that poverty is a Citywide issue, especially with all of the changes taking place due to gentrification. One stakeholder shared the sentiment that the allocation of resources should be a “both/and” rather than an “either/or” exercise. This went along with a concern that issues would just be pushed into other neighboring areas.

What would stakeholders do differently in regard to community development programs? Key stakeholder suggestions include improving community engagement, combining and focusing resources, providing high-quality and reduced-cost childcare services and ECE classes, and ensuring affordable and efficient regional transit.

- **Community engagement:**
  - “Let people be a part of the solution.”
  - “Reach out to residents in their own language.”
  - “Speak directly to the individuals being affected. Don’t just create events to invite them to; actually go their homes, knock on their doors, and tell them what is going on. Engage the community.”

- **Combining and focusing resources:**
  - “Tie our various investment systems together so communities have comprehensive connection. Often our programs are isolated and residents served in one program are not connected to other key programs a different office is providing.”
  - “Designate target areas for concentration of activities. Target areas could last 3-5 years with different areas selected later. Some activities could be undertaken outside target areas, but higher percentage of funds devoted to designated target areas.”
  - “Focus on solving a couple issues at a time versus broad-based, wide-ranging initiatives. Pursue transformational change of the highest priorities and once completed, move on to the next highest priorities.”
  - “Reallocate significant resources to individual neighborhoods or clusters of neighborhoods.”

- **Provide high-quality and reduced-cost childcare and ECE classes:**
  - “Provide full day, high quality childcare for parents and free monthly passes for low-income individuals.”
“Incentivize LITC developers to include child care in 1st floor commercial space, create additional subsidized spaces across the City for child care. For example, determine whether section 8 housing units could be set aside for child care and examine current rules to determine whether families with vouchers can provide child care in subsidized housing.”

“I would advocate for ECE programs to be considered schools and get EC teachers the pay equal to their work and importance in raising our youth.”

“I would include an early childhood education component in each low-income neighborhood.”

Ensure affordable and efficient regional transit:

“Free public transportation for low income qualifying residents.”

“Subsidize free public transit passes for *all* city residents.”

“Push back on RTD fare increases until they can prove they are providing and efficient service for residents.”

**Broadband and digital inclusion.** Interviewed stakeholders concurred with many of the suggestions provided in the survey. Several stakeholders mentioned that they were not aware of the work being done to address digital inclusion in the Denver; however, they felt that there is a need for additional efforts toward greater digital inclusion.

One stakeholder suggested that the City should form a committee that includes City staff, nonprofit stakeholders, and residents to assess equitable access to broadband internet and other aspects of digital inclusion. There is an impression that digital infrastructure is fairly consistent throughout the City but that, in general, digital access and inclusion in Denver is lagging behind other cities of a similar size.

Stakeholders also emphasize that access does equate to literacy and that additional digital literacy classes and trainings and access to community computer labs and hardware check-out options would be impactful for many low-income residents, including youth and those seeking to improve their job readiness. There is a strong existing network of organizations within Denver that are working on these issues but they would certainly benefit from additional collaboration, support, and funding from the City.

A broadband provider interviewed discussed the efficiency in providing broadband access on a per-development basis (as opposed to a per household model). Many market-rate multifamily developments are offering this service and extending that service to LIHTC or other affordable developments could help increase access for low and moderate income populations. Some type of financial incentive/subsidy would likely be necessary to help cover the up-front infrastructure costs. Some states have formalized this process by requiring in in the Qualified Allocation Plan for LIHTC.

**Emergency preparedness.** The city’s Office of Emergency Management (OEM) leads Denver’s emergency management efforts “to cultivate safe, prepared, and resilient
communities.” Representatives from across city departments serve help staff the Emergency Operations Center (EOC) when it is activated in response to natural disasters and/or other emergency situations in the city. This team participates in annual training and serves different aspects of the community both during and in the aftermath of emergency situations. Members of this team were included in stakeholder interviews conducted to inform the Consolidated Plan.

Overall, stakeholders felt the city is taking very intentional and proactive steps to make sure staff and residents are prepared to manage a significant natural or other disaster in the community. The EOC team is trained to help respond during a situation but also in the wake of a natural disaster—including reaching out to residents and businesses to help assess damage and connect them to recovery resources. The OEM also works consistently and proactively to provide guidance and informational resources to residents to help individuals prepare for natural disasters.

There are not geographic areas of the city known to have a disproportionately high risk of natural disasters though some residents and businesses may experience disproportionate impacts. Residents most vulnerable are those that depend on hourly wage employment as they do not receive wages if they cannot make it to work or their work is closed during or in the wake of a disaster. Small service-oriented businesses are also vulnerable as they are most impacted by potential closures and are the less likely than larger corporations to be able to weather a stoppage or shortage in cash flow.

**How would stakeholders’ changes positively impact community development program outcomes?** Stakeholders envision a better community for all types of residents:

- “Better access to affordable child care will lead to more families having the ability to work and reach economic sustainability.”

- “Existing community services would have more stability over time and not be interrupted every grant cycle by uncertainty. If nonprofits didn’t spend so much time applying for and administering (filling out documents, reporting, going through administrative hoops), more time could be spent on both the nonprofits and the City staff time to improve these services and serve more people.”

- “Giving everyone a seat at the table, a voice and dignity in seeking solutions to the hardships they face.”

- “If we remove barriers to work, transportation, and services for underserved communities WHILE investing in stabilization of those communities, we can hopefully slow the forces of gentrification and meet their basic needs.”

- “Quality of life, opportunity for change and support in building this city together.”
“Safe and affordable housing is a right not a business plan. The emotional and physical security and stability of affordable long-term housing allows people to address other issues for themselves. Middle class neighborhoods create the citizens of tomorrow.”

“Would reduce the ‘gentrification’: or pushing out of existing residents and businesses and allow the neighborhood to maintain its historic identity while also allowing change that would benefit the neighborhood as a whole.”

Housing and Homeless Needs. Stakeholders also provided perspective on housing needs in Denver, including services needed for people experiencing homelessness.

The greatest housing and homelessness needs identified in the survey and in stakeholder interviews are related to availability; affordability; housing for persons at 60% AMI or less; homeownership opportunities for first-time and low-income buyers; and mental health, substance abuse and preventative services for those residents experiencing homelessness or at risk of experiencing homelessness.

Most significant changes that have occurred in the Denver housing market during the past one to five years. Stakeholders most frequently identify increasing housing costs, population growth, and gentrification as the most significant changes in the Denver housing market over the past five years. Wage stagnation and the availability of housing were also key concerns followed by increasing construction and labor costs, an increase in homelessness, and resident displacement.

Stakeholders indicate that low-income residents, especially low-income families with children and low-income seniors, are amongst the resident groups that have been most affected by these changes in the Denver housing market.

Greatest unmet housing needs in Denver. As shown below in Figure A-4, stakeholders identify housing for persons at 30% Area Median Income (AMI) or less (56%), housing for persons at 60% AMI or less (40%), housing for homeless families (37%), housing for chronic homeless (35%), and homeownership opportunities for low income residents (29%) as the top five greatest unmet housing needs in Denver.

A stakeholder adds that a “Continuum of housing is not being met. Much focus is placed on <60% AMI but there is nowhere for those households to go as they obtain stable housing and then increase household income which puts low income (<100% AMI) households in a perpetual cycle of depending on low income or subsidized housing. More focus needs to be placed on the 60%-100% AMI spectrum (for sale and for rent) so that very low-income households can eventually transition to market rate housing.”
Figure A-4.
Greatest unmet housing needs in Denver

Note: n=164. Numbers add to greater than 100 percent due to multiple responses.

Interviewed stakeholders concurred that housing for residents with the lowest incomes and for those experiencing homelessness are two of the greatest unmet housing needs in Denver. They also identified a great need for more homeownership options for first-time homebuyers, affordable housing options that accommodate single-families, and housing options for people at 60-100% AMI and in the middle-income range, where there are no federal subsidies. Interviewed stakeholders identified residents experiencing homelessness with substance abuse and/or mental health issues as being in the greatest need of housing in Denver.

Stakeholders who work with residents experiencing homelessness emphasized that the lack of availability and affordability of housing in Denver are amongst the biggest challenges in securing housing for residents who are experiencing homelessness. These stakeholders note that many of the people in the shelters are currently working and simply cannot afford to live in Denver; as one stakeholder shared, “housing is very much out of reach for many of our impoverished community members”. Stakeholders who work with people with special needs note that personal backgrounds are also an issue for residents—factors like prior evictions and criminal history serve as a barrier to accessing housing options.

Figure A-5 shows how stakeholders rank the perceived greatest unmet needs by urgency of the needs. Respondents identify housing for persons at 30% Area Median Income (AMI) or less (31%), housing for persons at 60% AMI or less (18%); housing for chronic homeless (9%); housing for persons with serious mental illness, housing for seniors, and homeownership opportunities for low income residents (tied for fourth most urgent need at 9% each); and homeownership for moderate income residents (8%) as the top five most urgent unique unmet housing needs in Denver.

**Figure A-5. Most urgent housing needs in Denver**

<table>
<thead>
<tr>
<th>Rank</th>
<th>Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Housing for persons at 30% Area Median Income (AMI) or less</td>
</tr>
<tr>
<td>2</td>
<td>Housing for persons at 60% AMI or less</td>
</tr>
<tr>
<td>3</td>
<td>Housing for persons at 80% AMI or less</td>
</tr>
<tr>
<td>4 A</td>
<td>Housing for persons with serious mental illness [tie]</td>
</tr>
<tr>
<td>4 B</td>
<td>Housing for seniors [tie]</td>
</tr>
<tr>
<td>4 C</td>
<td>Homeownership opportunities for low income residents (earning less than 80% AMI or about $45,000/year) [tie]</td>
</tr>
<tr>
<td>5</td>
<td>Homeownership opportunities for moderate income residents (earning 80-120% AMI or generally between $50,000 and $75,000/year)</td>
</tr>
</tbody>
</table>

In interviews, stakeholders who work with residents experiencing homelessness identified single mothers with children, people with disabilities, people with severe mental illness,
and seniors as the most vulnerable groups of people within the population experiencing homelessness. Stakeholders who work with residents with special needs express that all people living in poverty are extremely vulnerable but add that young adults aging out of foster care and sex offenders (especially those who are young) are in extremely difficult positions in the community. Stakeholders express that while the stigma attached to sex offenders is understandable, we need to find a better way to address these residents’ needs.

**Most important issue concerning the availability of quality housing in Denver.** As shown below in Figure A-6, more than one in five stakeholders (22%) identify that the most important issue concerning the availability of quality housing in Denver is that there is not enough housing available in general. Fourteen percent indicate that the types of housing available do not fit the needs/desires of the residents. Twelve percent indicate population growth as the most important issue. More than one in ten (11%) identify affordability as the most important issue concerning availability of quality housing in Denver.

**Figure A-6**

**Most important issue concerning the availability of quality housing**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not enough housing available in general</td>
<td>22%</td>
</tr>
<tr>
<td>Types of housing available do not fit the needs/desires of the residents (apartments v. single family, size of unit, etc)</td>
<td>14%</td>
</tr>
<tr>
<td>Population growth</td>
<td>12%</td>
</tr>
<tr>
<td>Affordability</td>
<td>11%</td>
</tr>
<tr>
<td>Lack of rental housing/very low vacancy rates</td>
<td>9%</td>
</tr>
<tr>
<td>Not enough quality housing available</td>
<td>9%</td>
</tr>
<tr>
<td>Neighborhood issues (high poverty rate, high crime rate, low school quality)</td>
<td>6%</td>
</tr>
<tr>
<td>Underinvestment from government/public sector</td>
<td>6%</td>
</tr>
<tr>
<td>Construction defects law</td>
<td>4%</td>
</tr>
<tr>
<td>Housing discrimination</td>
<td>4%</td>
</tr>
<tr>
<td>Other (please specify)</td>
<td>1%</td>
</tr>
<tr>
<td>Underinvestment from private sector</td>
<td>1%</td>
</tr>
<tr>
<td>Ineffective code enforcement</td>
<td>1%</td>
</tr>
</tbody>
</table>

Note: n=162.

In interviews, stakeholders strongly agreed that the availability and affordability of housing in general are the most important issues concerning quality housing in Denver.

**Most important issue contributing to a lack of affordable housing in Denver.**

As shown below in Figure A-7, more than one in three stakeholders (35%) identify that the most important issue contributing to a lack of affordable housing in Denver is increased housing costs due to new development in the area and rising property values. Nineteen percent indicate rising rents as the most important issue. About one in ten stakeholders (11%) indicate the lack of public funding to support housing as the most important issue contributing to the lack of affordable housing in Denver.

**Figure A-7.**
**Most important issue contributing to the lack of affordable housing**

- Increased housing costs due to new development in the area and rising property values: 35%
- Rising rents: 19%
- Lack of public funding to support housing: 11%
- High cost of housing due to land costs/land speculation: 9%
- High cost of housing due to construction costs: 7%
- Low wages in general/low minimum wage: 6%
- Zoning restrictions on density: 6%
- City of Denver policies that increase housing costs: 4%
- Low wages due to low skill/low educational attainment: 2%
- Low wages due to mismatch of available jobs and education: 1%
- Life choices of residents: 1%

Note: n=159.

**Increasing the effectiveness of Denver’s housing programs.** Stakeholders provided a range of suggested strategies for how the City can increase the effectiveness of its housing programs. Stakeholders overwhelmingly advise the City to maintain, create, grow, and support affordable housing options. Other key stakeholder suggestions include efforts that increase funding for housing, balance profits with meeting the needs of residents, and that allow for collaboration with the private sector.
- **Increase affordable housing:**
  - “Ensure housing remains affordable for all residents and provide supports/resources that not only address people in crisis but also helps them to get back on their feet in a sustainable manner.”
  - “Eliminate red tape, create more social bond programs to encourage affordable housing development and partner with nonprofits that work in the housing space.”
  - “Engage with developers who are willing to invest in Denver long term and subscribe to an affordable housing initiative.”
  - “Bank all City-owned land immediately; offer long term land leases for development of such land (e.g. DON'T sell any City-owned land to private interests).”

- **Increase funding for affordable housing:**
  - “Increase funding. REQUIRE Affordable housing in all redevelopments both rental and purchase.”
  - “Increase funding. The costs of rent are just too high. Require employers to increase the minimum wage to a livable wage.”
  - “Develop a more robust affordable housing trust fund.”

- **Tailor strategies and programs to meet the needs of residents:**
  - “Priority must be given to those living at the lowest incomes where the greatest need is. If you address that huge housing gap, you can shift priorities over time. Stop incentivizing bad behaviors by profit-driven landlords.”
  - “Regularly evaluate the effectiveness of housing programs and divert money to those interventions that show the most positive outcomes. Partner with Metro Denver Homeless Initiative to evaluate housing programs for homeless households as well as the different types of housing interventions and provide funding for those programs and interventions that are truly making a difference.”
  - “Put people over profits.”
  - “Prioritize equitable planning and development. Actively prohibit development in areas that would suffer.”

- **Incentivize private sector development of affordable housing:**
  - “Insist/provide incentives to make sure there is affordable housing in new developments. Provide incentives to make sure local residents have priority in
getting into these affordable housing units. Do whatever you can to have people stay in their own homes.”

- “I would try and encourage private investors to invest more in low income housing through grants, bonds, and mostly reduced fees from the City.”
- “Leave more of the work to the private sector through incentives.”
- “Provide incentives for the private sector; need to attract them somehow.”

Interviewed stakeholders emphasize the need for prioritizing additional options for people at 30% AMI or less, providing down payment assistance for single family housing, additional tax credits, more private activity bonds, and establishing land trusts and land-banking.

**What would stakeholders do differently in regard to housing programs?** Not surprisingly, stakeholders’ suggestions for what they would do differently in regard to Denver’s housing programs align closely with their suggested strategies for increasing the effectiveness these programs. Once again, stakeholders emphasize the importance of prioritizing affordable housing creation. They also reiterate the importance of an increase in funding. Additional stakeholder suggestions include expanded community engagement, efforts that address homelessness, and the use of innovative solutions.

- **Prioritize affordable housing:**
  - “Incentivize more development of affordable housing.”
  - “Require developers to provide more affordable housing options, both for sale and rental.”
  - “Value diversity over high-end development. Stop incentivizing gentrification. Prioritize lower income housing.”

- **Increase funding:**
  - “Invest more into equity building and ownership so that the public burden decreases overtime.”
  - “Increase the budget spent on these supports”
  - “Invest more in homelessness prevention, eviction prevention, and diversion efforts. Target housing assistance to areas going through fast changes to avoid displacement due to gentrification. Incentive collective impact model programs-- i.e. everyone works together toward goals like ending family homelessness.”
  - “More funds for publicly supported housing services through new funding streams.”
- **Expand community engagement:**

  - “Add teams who represent stakeholders in racial, gender, and social equity who have decision making power. Evaluate the impact of housing programs and add more effective housing. Not simply ‘one and done’. Change the narrative from development and wealth attraction to equity.”
  
  - “Engage additional stakeholders in the process outside of or in addition to those who are traditionally at the table. Commitment to real-time data and measurable outcomes in partnership with others in the region (specific to homelessness).”
  
  - “Interact more with individuals in the community that typically do not engage, either because they do not have time because of work, or because they do not believe that anyone cares.”
  
  - “Work with non-profits that have a long history with the communities they’re in to find solutions for each neighborhood.”

- **Address homelessness:**

  - “An adequate supply of affordable housing resources for ex-offenders, people with mental disabilities and other marginalized people must be available to combat homelessness in Metro Denver.”
  
  - “Focus the need on helping people and not focus on the term homeless. Everyone that is homeless has a different reason for their homelessness, which means they all need to be treated and helped based on that reason.”
  
  - “Stop treating the homeless like criminals. Clean up the shelters and make them smaller and more diverse so people who have unique conditions (married, no kids or pets or trans) feel more comfortable going. Make sure that there is enough shelter in the city so that if everyone who you are ticketing wants to go into shelter. People would be more likely to go inside if they felt respected by the greater community. This does not happen when police are constantly ticketing people or moving people along. We need more money for case management services and housing assistance funds.”
  
  - “I would have a panel to address the homelessness and affordable housing crisis that INCLUDES people who have experienced homelessness AND people who are currently homeless. They are the ones who understand the need best.”

- **Innovative solutions:**

  - “Denver Public Schools could provide vacant land to build rental housing for homeless families and teachers/district retirees.”
  
  - “Get rid of the RFP process, which has produced very few units for a City in dire need of housing units of all types, low income, market rate, for rent and for sale.”
Make all land immediately available for affordable housing production and pass a zoning proclamation stating all City owned land is zoned for affordable housing of any type. Consolidate department owned land and put it under control of OED so that OED can offer the land to the market for affordable housing production.”

- “Utilize a land trust model for permanent affordability.”
- “I would look for support of alternative housing programs that emphasizes community and permanence. We need to disperse services and not collect people in one or two areas.”

In interviews, stakeholders emphasized the need for more housing options in the “missing middle”, increased options for first-time homebuyers, an alignment of resources and priorities between the Mayor’s affordable housing plan and the public and private housing stakeholders, and a focus on coordinating resources and services.

**How would stakeholders’ changes positively impact housing program outcomes?** Stakeholders envision lasting change, greater equality, and access to opportunity for all residents:

- “Better quality of life and safer/healthier neighborhoods for more people, not just those who can pay the price. Housing should be a priority to the wellbeing and basic needs of all residents, not a privilege to those who make the most money. This is a basic need and once families and individuals can stop worrying about where they will sleep, they can contribute to our economy and be productive.”

- “I believe listening to those on the margins and those who have experienced the very things we are trying to address is the beginning to finding lasting solutions.”

- “I think that we would see a drastic improvement in standard of living if we treated all members of the community with respect.”

- “If you took the amount of money spent over a period of time, by investing more up front it would save the public more money and benefit more people.”

- “It would decrease the racial wealth gap and build social equity.”

- “People with secure and safe housing would be better prepared to address their other basic human needs...including becoming gainfully employed, functional parenting, possess a strong sense of self, etc. All of these factors would motivate and prepare them for becoming contributing members of society.”

- “Provides opportunities to meet the housing need while preserving our history, traditional neighborhood character and existing affordable housing!!!”
“We would see that housing is connected and the center of many of the other issues Denver is facing with education, health and health care. We would look at the whole picture.”

“We would, as a community, become more invested in the outcomes rather than the programs or agencies providing services.”

**Successes and challenges with Denver's Affordable Housing Fund.**

The stakeholders who were familiar with the City's Affordable Housing Fund shared a variety of perspectives on what is working best with the fund, including:

- “Generating revenues for affordable housing initiatives”
- “Affordable, low-income home purchasing programs, similar to those sponsored by Northeast Denver Housing Center has done much to encourage low income people to strive to become gainfully employed, responsible homeowners, etc.”
- “Great to see the City's commitment backed up with funding.”
- “Increased commitment to the Permanent Supportive Housing.”
- “Funding of innovative programs.”

The stakeholders also provided examples of challenges that they perceive or have experienced with the fund, including:

- “Insufficient funding to meet demand.”
- “It doesn't do enough, isn't well known enough or both. It says the average rent in Denver for a two-bedroom apartment is nearly $1,500 - WHERE?? Certainly not in areas with easy access to public transportation, desired retail, or a reasonable commute.”
- “New initiatives not clearly communicated”
- “They do not make their services available to people getting out of prison...10 year waiting lists are not practical.”
- “Too much bureaucracy, too much reliance on LIHTC, too much reliance on the private sector to provide public benefits.”
- “Lack of focus on the middle AMI and need more focus on closing the wealth gap.”
- “A large portion of the money has been given to one organization. I believe this monopolizes the process and creates an unequitable system.”
- “Members often feel unheard by city staff. Opinions and suggestions are given, then staff does what they want anyway.”
“This plan is largely reactive. We need to be proactive to stop predatory housing. needs to also be more comprehensive. You cannot just simply build housing then leave, more services are necessary. We cannot wait 10 years for housing, we need action and commitment from private sector.”

Resources most needed to help people end their experience with homelessness. Not surprisingly, providers of homeless housing and/or services strongly emphasize the need for truly affordable housing. They also identify the need for specific supportive services, specialized supports for vulnerable subpopulations within the homeless population, and a variety of housing options.

- **Affordable Housing:**
  - “More affordable housing - not necessarily all publicly supported housing - just housing that has long-term affordability (i.e., more DHA resources prioritized for people exiting homelessness).”
  - “More apartments that are affordable for people who are living off of a fixed income of $800 or less. Currently, they can only afford to live in subsidized housing which has 1-5 year waitlists. More investment and expansion of programs like OneHome, Social Impact Bond, PSH buildings, and paying better wages for human service/mental health/homeless service providers. We need additional and less restrictive first month’s rent and deposit assistance (MDHI Flex Fund is very helpful - helps to pay for things that are barriers to housing like past rent due).”

- **Supportive Services:**
  - “Community building services and long-term commitment.”
  - “Mental health and workforce support.”
  - “Money for services that is flexible.”
  - “Services for those with behavioral health issues.”
  - “Programming that needs basic needs first. Housing, safety, security, food. Then addressing mental health, addiction, trauma. These things need to happen in the context of a supportive community.”

- **Specialized supports for vulnerable subpopulations:**
  - “Funding for supportive services in places like Irving Place, or the quality programs for people who are fleeing from Domestic Violence, in single head of household and runaway youth.”
  - “Intensive services for youth including site-based case management, substance abuse treatment and access to timely mental health services.”
“Lack of ADA accessibility is a big concern in transitional housing and in shelters.”

“The homeless person living with me has a criminal record, which is making it impossible for him and his family to find housing.”

**Rapid rehousing and shelter needs:**

- “A dedication to Housing First philosophy. Rapid rehousing funding and permanent supportive housing vouchers for people with SUD and SMI.”

- “Non-time limited housing that provides a continuum of services from congregate care, to site-based (i.e., dedicated apartment buildings) to scatter site (throughout the community). The ability to move easily from one to the other, as needs increase or decrease, should not be dependent on homeless status or coordinated entry.”

- “On demand temporary shelter for longer than a day.”

- “Stop enforcing the camping ban without places for people to go. Need more appropriate shelter and short-term (bridge and transitional) housing options. Supportive services through housing process. Homelessness prevention like eviction protections.”

- “Rapid rehousing services and additional investment in coordinated entry systems and permanent supportive housing for individuals experiencing chronic homelessness.”

In interviews, stakeholders who serve residents experiencing homelessness strongly emphasized the need for preventative services (job training and placement, more case workers and advocates, more resources that are flexible in application, increased outreach and education, etc.), mental health services, substance abuse treatment, and regional coordination of services. They also indicated a need for more space for couples in shelters, more shelters that serve the LGBTQ population, spaces for people who do not succeed in shelter settings, and more vouchers that are flexible in nature (and/or support in advocating for this with HUD). As one stakeholder noted, “We need employment, housing, mental health services, and substance abuse treatment. Income, access to healthcare and housing is what will end homelessness. Wraparound services are what drives up the retention rate.”

Interviewed stakeholders who serve residents with special needs shared many of the perspectives of stakeholders who are working to address homelessness. These stakeholders added that additional resources are needed to help residents get through the last two weeks before they are placed in housing as this is a time of frequent breakdown within the system. They expressed that any housing vouchers should also come with an employment opportunity or wage subsidy voucher. As one stakeholder noted, “My biggest issue and only editorial is that it is not enough to give someone keys and tell them good luck and that happens a lot in this City.”
These stakeholders also advocated for programs to reduce evictions, additional crisis intervention services, and increased mobile same-day services that position low- and no-barrier services and resources on the streets and within the City, rather than within organizational sites. The stakeholders emphasized the need for more people (police officers, publicly supported housing employees, etc.,) to be trained in providing trauma-informed care. One stakeholder suggested that there should also be a resource center for people who have been evicted and are no longer eligible for publicly supported housing.

**Expected outcomes of a successful allocation of HUD block grant funds to address housing and community development needs in Denver.** As shown in Figure A-8, there are a wide variety of outcomes stakeholders would expect to see if the City is successful in directing HUD block grant funds to address the housing and community development needs in Denver. Three in five stakeholders (60%) identify that they would expect to see more affordable rental housing as an outcome. One-half of respondents (50%) would expect to see permanent housing and programs to assist persons who are homeless. Another half of stakeholders (49%) would expect to see an increased number of Section 8 vouchers or rental subsidies as an outcome. Two in five stakeholders (41%) would expect to see more mental health care services.
Figure A-8. Expected outcomes of successful allocation of HUD block grant funds

Note: n=143. Numbers add to greater than 100 percent due to multiple responses.


<table>
<thead>
<tr>
<th>Outcome</th>
<th>Percent</th>
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<tbody>
<tr>
<td>More affordable rental housing</td>
<td>60%</td>
</tr>
<tr>
<td>Permanent housing and programs to assist persons who are homeless</td>
<td>50%</td>
</tr>
<tr>
<td>Increased number of Section 8 vouchers or rental subsidies</td>
<td>49%</td>
</tr>
<tr>
<td>More mental health care services</td>
<td>41%</td>
</tr>
<tr>
<td>Additional and higher quality child care centers</td>
<td>36%</td>
</tr>
<tr>
<td>More opportunities for homeownership</td>
<td>33%</td>
</tr>
<tr>
<td>Housing for specific types of residents</td>
<td>30%</td>
</tr>
<tr>
<td>A job training center or enhanced job training programs</td>
<td>28%</td>
</tr>
<tr>
<td>More shelters to assist persons who are homeless</td>
<td>24%</td>
</tr>
<tr>
<td>More addiction treatment services</td>
<td>23%</td>
</tr>
<tr>
<td>More housing that is accessible to persons with disabilities</td>
<td>22%</td>
</tr>
<tr>
<td>More housing options for seniors to downsize</td>
<td>21%</td>
</tr>
<tr>
<td>Rehabilitation to rental housing</td>
<td>20%</td>
</tr>
<tr>
<td>Energy efficiency improvements to existing housing to reduce utility costs</td>
<td>19%</td>
</tr>
<tr>
<td>More persons with disabilities able to live independently</td>
<td>18%</td>
</tr>
<tr>
<td>Historic buildings and housing preserved and rehabilitated</td>
<td>17%</td>
</tr>
<tr>
<td>More seniors able to live independently/less seniors leaving their homes to live in nursing homes</td>
<td>16%</td>
</tr>
<tr>
<td>Streets and sidewalk improvements, including features that make them more accessible to persons with disabilities</td>
<td>16%</td>
</tr>
<tr>
<td>More trainings and technical assistance to area nonprofits</td>
<td>14%</td>
</tr>
<tr>
<td>More rehabilitation to housing for existing homeowners</td>
<td>13%</td>
</tr>
<tr>
<td>A community center or improvements to a community center</td>
<td>12%</td>
</tr>
<tr>
<td>More jobs</td>
<td>12%</td>
</tr>
<tr>
<td>More recreation opportunities for youth and other special populations</td>
<td>10%</td>
</tr>
<tr>
<td>Improvements to water and sewer systems to reduce costs to residents</td>
<td>9%</td>
</tr>
<tr>
<td>Neighborhood business/commercial areas revitalized</td>
<td>8%</td>
</tr>
<tr>
<td>More opportunities to for business to start up/expand/locate here</td>
<td>6%</td>
</tr>
<tr>
<td>A senior center or improvements to the senior center</td>
<td>6%</td>
</tr>
<tr>
<td>A library or improvements to the library</td>
<td>4%</td>
</tr>
<tr>
<td>Other</td>
<td>11%</td>
</tr>
</tbody>
</table>

Stakeholders provide additional detail regarding the outcomes identified in Figure A-8.

- “As Denver’s density keeps increasing, open spaces and yards are being scraped at an alarming rate. Making sure open spaces like community gardens are planned for will ensure that some of these open spaces are preserved. They also build community and encourage stability.”
“By increasing the number of Section 8 housing vouchers for people with disabilities and increasing the number of accessible units (ie: require apartment complexes to meet ADA guidelines for the percentage of accessible units) thereby giving the opportunity for PWD to live independently. Improving the cities’ sidewalk infrastructure would benefit everyone -walkers, people with strollers, the elderly, kids walking to school, people walking to work.”

“Community Centers: The only community center in the Denver metro area is St Francis Center. Individuals experiencing homelessness in the suburbs surrounding Denver do not have access to community centers or Day sites as connection points for services.”

“It’s very challenging finding childcare slots in Denver right now making it hard for parents to go to work or school. Home Ownership in Denver is out of reach for work-force housing. It would be great to bring back IDA accounts for home ownership.”

“Supporting our seniors to remain in their homes and in their communities is important to the fabric of our City.”

“There is a lot of research that suggests that when governments subsidize aspects of housing, human health (including emotional health) outcomes increase. When people are able to function without fear of homelessness and displacement, they are better able to engage in their communities, such as schools, park services, library services etc... and engaged community members are better for civic functioning (i.e., more likely to care about physical environment, developing social ties, etc.).”

Non-profit capacity and organizational needs. The stakeholder survey and interviews also included questions to help identify gaps in the institutional delivery system and the capacity and organizational needs of providers.

Key observations and suggestions are related to streamlining and coordinating services, increasing support and funding for existing nonprofits, a continued effort to collaborate and provide transparency, and innovative ideas and solutions.

Devoting resources to address capacity and organizational needs. Stakeholders were asked what they would do if they had additional funds to address capacity and organization needs. Of stakeholders who contributed suggestions for capacity and organizational needs, they would devote funds to efforts that streamline services, support existing nonprofits and service providers, create resource and community centers (especially for residents experiencing homelessness), and other innovative strategies related to housing.

Streamline services:

- “Codify and communicate policies and procedures to streamline program implementation.”
“Create a system of support for Denver residents that isn’t so siloed. Allow extended service hours for the working poor receiving supportive benefits such as food stamps, CCAP, etc.”

“Denver’s Road Home should be creating a single system of services throughout the city rather than having a series of siloed agencies.”

Support existing nonprofits and other service providers:

“Get money into the hands of community providers who can efficiently and effectively provide services to the community.”

“Help with capacity building for organizations that are successfully solving problems including homelessness, housing affordability, and mental health services.”

“Support the non-profit groups in pre-development activities and securing sites for future development.”

“Invest in community groups working with current property owners to understand that selling their homes for what they think is a lot of money isn’t the solution. Also need to build capacity of community land trust groups.”

Create resource and community centers:

“I would develop regional drop in centers where anyone could get connected to all local resources (expanded one-stop’s): housing, shelters, job training, mainstream benefits, Medicaid enrollment, affordable healthcare, legal assistance, childcare, and subpopulation specific services (senior, HIV/AIDS, LGBTQ, etc.).”

“Create more centers to help homeless people and people with mental health problems.”

“Create new 24/7 shelters/community/job centers.”

“Open Multicultural Centers where everybody can feel welcome.”

“Look for innovative ways to partner community agencies in accessible neighborhoods sites for free to low cost prosperity services/poverty disruption.”

Innovative strategies:

“Access to capital for new business owners, subsidized spaces in Denver, better incentives and mechanisms for incentivizing developers to include child care in their plans.”

“Additional funds could be saved and deployed to purchase at-risk market-rate housing during next recession/correction to prevent displacement during next boom.”
“I would ensure that more attention was paid to historic preservation because that’s part of what gives a neighborhood character, but I would also ensure that the community garden programs (DUG) are funded so they can continue to support their network of community gardens. Community gardens provide open space in urban areas, but also are important for a variety of populations - many families truly rely on the food they grow as part of how they feed their families. Community gardens donate thousands of pounds of food to local food banks and similar to support people in need, either economically or for health reasons. They are an essential tool in combating isolation and loneliness in elders. Ecologically, the gardens provide food and habitat for wildlife and bees. A healthy community garden system supports a healthy community overall.”

“Make more requirements for developers and builders, train more housing case managers, have the city create one data base where all housing information (emergency, transitional, affordable) is all transparent for clients, case workers and city and county employees.”

Interviewed stakeholders concurred that the City should continue to build on its efforts to collaborate with nonprofits and other organizations, elevate resources, and provide transparency. As one stakeholder noted, “The City can be doing a lot of great things but if we are not sharing it, it is the great unknown secret.” Stakeholders emphasized the need for further partnership and collaboration amongst nonprofits, trying to utilize resources in a more narrow and focused effort in order to make more sustained and impactful progress. Stakeholders suggested that the City could identify areas of need and coordinate nonprofit efforts to serve as an extension of the City, increasing capacity and building goodwill in less-engaged communities.

**Ways to improve the Annual Action Plan or other Denver housing, economic development, or neighborhood plans to better serve Denver’s low- and moderate-income residents.** Stakeholders identify a number of suggestions for improving the Annual Action Plan or other Denver housing, economic, or neighborhood plans.

- “Actively engage the CoC (MDHI, Board of Directors, etc) in the process to ensure more current information is being considered and there is a commitment to shared outcomes.”
- “Have local neighborhood groups involved with them and don’t try to make a "one size fits all" solution.”
- “Increased geographic targeting; research demonstrates the enhanced effectiveness and improved outcomes (e.g., Richmond, VA).”
- “Make sure larger land use/zoning policies are not discriminatory, either intentionally or otherwise. For example, the last Blueprint Denver exacerbated displacement by concentrating investment in "Areas of Change."
“More funding is always appreciated, but also look more internally to changes that can be made within the City to reduce costs to develop affordable housing at all levels. Also, however possible, the City should try to influence the use of Opportunity Zones/Opportunity Funds to direct investments to meet the City’s housing and economic development goals (include community input in this process).”

“Those who are most vulnerable in our community have the least number of choices especially when it comes to housing and so they should always be a priority when we are choosing to spend money on housing.”

**Suggestions from interviewed stakeholders:**

- “I know the City has tried Section 108 and has struggled but the Section 108 program has been used to great impact in other communities. Many communities across county have successfully addressed infrastructure issues with this. Section 108 is more equitable and covers more. I know there may be political reticence to do this but worth re-looking at.

- “We need to look at SROs, tiny home villages, other options on the continuum. We cannot build ourselves out of this mess. We have to be so creative about it. Not everyone understands cost-benefit of housing first. City should invest more in vouchers and less on new development. There is a lot of housing stock that we could maybe open up with vouchers. We should be repurposing old buildings - like we did with Stout Street - like schools and turn into housing options.”

- “Three years ago we built the Lawrence St community center for homeless residents and we could definitely benefit from another center like this. It is a 24-hour resource center and it would be wonderful to have more. It is a safe place to be.”

- “I would like to see Denver focus on high opportunity areas and to do land bank in high opportunity areas. There is a lot of focus in high poverty areas, which is great, but it is not helping those areas that have higher opportunity inherently.”

- “I see City development dollars following gentrification. Instead, we should bring City development dollars into neighborhoods that are 5 years from gentrifying.”

- “We need more creative housing options. We have a lot of affordable housing units that are just not designed for what they are being used for. We need to repurpose older apartments now that we know about trauma-informed care.”

- “Put affordable housing option projects on the fast track through all permitting processes. Provide a fast track option.”

**Other programs and policies the city could employ to better address housing and community development needs.** Stakeholders
provided a number of recommendations for additional programs and policies that the city could employ.

- “California’s LIIF and the Early Childhood Development Toolkit for Employers”

- “I believe that we have to work in concert with DRCOG the Urban Municipal League, Metro Counters Commissioners INC, the Urban Institute, any entity that is in the Metro Region such as the Metropolitan Denver Homeless Initiative (MDHI) across all boundaries and have a broad-based PLAN for the Front Range.”

- “I like what St. John’s Cathedral and St. Francis Center apartments at Colfax & Washington Streets have done w/ their new rental units to build community w/ the church congregation.”

- “If the State can also incentivize the use of OZ funding in ways that will support affordable housing and economic development that it would like to see, I would encourage that. A major concern many have with OZ funding is that it might only serve the corporate world and investors, but could have a detrimental effect on LMI residents of OZ neighborhoods (gentrification pressures, what type of jobs and pay will be available or developed? what job training available for LMI residents to take advantage of better pay opportunities?...etc.)”

- “Look at City of Minneapolis' new zoning overhaul. The goal is to deconcentrate poverty (sprinkling rental properties in a single-family neighborhood), be more ecologically sustainable (less cars) and be more integrated (racially and socioeconomically).”

- “The state needs to lobby the Colorado Housing and Finance Authority to get less restrictive about when and where they allocate non-competitive tax credits. Many projects could move forward but for CHFA’s insistence on protecting existing projects until they are fully leased. The City and State need to communicate to CHFA that the market has shifted so far into the spectrum of being unaffordable, that it doesn’t matter where or how many affordable units are produced, they will be absorbed. CHFA is providing a limiter to unit production when they should be encouraging any and every project possible to get out of the ground. The state should also lobby our state legislature to modify existing laws and create new ones to encourage the production of more affordable housing, including changing the property tax exemption to run with the use of the land not the ownership of the land. Current property tax exemptions are only available to public housing authorities and the involvement of a housing authority takes times, costs money, and makes affordable housing production less efficient thereby creating fewer units.”

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1 http://www.liifund.org/; http://epicemployertoolkit.org/increasing-access-to-quality-child-care-.html

2 https://minneapolis2040.com/
- “California has created LIIF for building capacity around child care.”
  - “California Proposition 1 Housing Programs and Veterans’ Loans Bond. Portland, OR has done great things with tiny homes as well.”
- “Consider modeling after/collaborating with HUD Section 4 grant makers.”
- “City of Edmonton Great Neighborhoods”
- “In Atlanta, there is a group of developers who work together to build affordable housing for those experiencing homelessness. It would be nice to see more collaboration and partnership within the community. Developers, landlords, property managers, service providers, and those being most underserved working together.”
- “Philadelphia has housing in Project Home that is in all INCOME neighborhoods, Portland has a corporate model for health care that includes hospitals as places for total integrated health care. New York City has a dedicated funding stream for housing for programs like Ready Willing and Able the Doe Fund, and the budget for emergency housing is 2 million annually. Likewise, L.A. has dedicated emergency funding for projects that permanently house formerly homeless people in their housing and offers them a peer support team.”
- “Specifically, in relation to housing, please look at the City of Lakes Community Land Trust in Minneapolis. In relation to community and economic development, please look at the Cooperative Network in St. Paul, MN.”
- “Tacoma, WA school and city have focused Sect 8 vouchers to target highly transient school neighborhoods. A School District outside St Louis, MO has built group homes for homeless teens.”

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5 https://www.hudexchange.info/programs/section-4-capacity-building/.
7 http://opendoorsatl.org/.
“Vancouver allows home owners to have an internal or attached ADU and an external ADU! Portland has removed a permit fees for ADUs.”

**Focus Group with Residents Currently Experiencing Homelessness**

In addition to the stakeholder engagement described above—including stakeholders serving the homeless population of Denver—the city’s consultant team sought the perspective of residents currently experiencing homelessness. The team met with residents at St. Francis Center to discuss their experiences and perspectives on the services most needed to transition out of homelessness.

**Access to housing resources.** The residents that participated in the discussion included unsheltered residents and residents sheltered at the Denver Rescue Mission. While most would be happy to live in any permanent housing, with or without roommates, some felt that large apartment buildings were overwhelming and that they would prefer not to live with strangers.

General sentiment among participants was that housing affordability is a critical concern in the community and that waitlists for assisted housing are far too long. One senior resident noted that he/she has three sources of income but will need to wait two years for housing (based on her position on the waitlist for publicly assisted housing). Another participant noted that he/she is currently working one full time and one part time job but still cannot afford market-rate housing.

In regard to housing services, participants had the following needs/suggestions:

- More housing dedicated to seniors;
- More assistance from case workers and faster processing (have to advocate for yourself because case workers are too busy and cannot move quickly enough);
- Daytime shelters where people experiencing homelessness can sleep, for those that work night shifts);
- One participant mentioned that it would be nice to have all resources needed (housing, rehab, jobs) under one roof so that services could be coordinated and accessible:
- Education on how to be a good tenant, how to keep housing;

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Increased sensitivity among some shelter providers/workers: “They couldn’t care less what you want unless you’re in their system. There’s not a lot of compassion and they don’t know how to talk to people like us.”

Access to transportation. Several participants highlighted a lack of affordable transportation as an issue, especially in relation to securing a job. One participant mentioned that bus passes for job hunting would be incredibly helpful. He is a welder and said that there is a lack of downtown industry in his field and so he needs to go to the suburbs to find work. In his estimation, a reliable ride to work would help 60 percent of the people at St. Francis Center get themselves to a job each day.

Access to employment. With the exception of one participant who has reached retirement, all participants mentioned the great difficulty they have faced in obtaining a job. A huge hurdle is not having an address other than St. Francis or Jesus Saves to put on their applications. The perception is that these addresses are immediate red flags to potential employers, who have been burned by people in the past, and that they automatically say no to any applicants using those addresses. One participant mentioned that a PO Box would be a nice option for people experiencing homelessness. Participants also noted the importance of having a phone to help secure employment.

Participants mentioned that day labor is available but that employment opportunities are not open to people experiencing homelessness. Many participants mentioned the need for job resources, job training, and further educational opportunities. Specific needs mentioned include: connection to specific educational/training opportunities (e.g., CDL classes, trade-based work, construction work), computer literacy skills to aid in online application processes.

For those in the trades, lack of access to tools and safety equipment can be an impediment to employment. Same for those who complete a trade certification or other training program; they may graduate, but lack the resources to purchase tools or other equipment required to be ready to work.

One participant noted that the first couple of weeks after someone gets a job but before they receive their first paycheck are the hardest to manage. He mentioned that it would be helpful to have housing and job resources followed by support for the first two (or so) weeks so that someone has a chance to actually get on their feet.

Other supportive services. Residents discussed the following supportive service needs:

- Several people mentioned legalized marijuana as a huge issue and also as something that has attracted people who are experiencing homelessness, especially youth, to Denver. With respect to drugs and crime, one participant said “the police are doing a good job, keeping the drug epidemic down.”
Many participants mentioned the need for more rehabilitation resources and programs for addiction. If people want to get clean, there are not any options for them. "Instead of locking you up for a drunk, why not put them into treatment?"

Many participants mentioned the need for additional mental health services. One participant expressed that he felt the vulnerable mental health population was dumped out of mental health programs into the homeless population.

Several participants described the need for secure storage, like lockers.

**Suggested solutions.** The following solution ideas came out of the discussion with residents experiencing homelessness:

- Further coordination of resources and services- centralize resources and supports as much as possible to streamline care and to cut back on overlaps/duplication and the need for residents to travel from place to place. Bring as many different types of supports under one roof as is possible.

- Fund/support “mentors” who can help people access resources from all of the different providers around the city and neighboring communities. Including housing, employment, identity papers and benefits, but someone who is a “mentor” not a case worker or probation officer, but someone with more “compassion”, maybe a formerly homeless peer?

- Create a job/education/resource center or fair for people experiencing homelessness.

- Outreach to local/downtown employers to hire people from St. Francis Center or sponsor them for job training.

- Outreach to local employers to donate tools/equipment to people graduating from certificate programs/training programs.

- Prioritize free/reduced transportation options for low-income residents.

- Invest in drug/alcohol rehabilitation; pilot program to divert jail night/detox funds to treatment.

**Input from Community Meetings and Public Hearings**

The City held four community meetings as part of the resident outreach for the Consolidated Plan. One meeting was held before the public comment period and serves as the public hearing prior to public comment based on HUD’s requirements. Three meetings were held during the public comment period. All meetings were advertised in both English and Spanish and met HUD requirements for public notice.

The City of Denver publicized all of its public meetings and the public comment period via a press release to area news outlets and publications. The City also published a legal notice.
on Friday, May 31st with the Denver Post announcing the start of the public comment period from May 31st through July 1st and where to locate the draft document. The City posted the draft document on Denvergov.org/economic development on May 31st, per the notifications. The meetings were held at the following locations, dates, and times:

- Johnson Recreation Center, May 30, 2019 from 5:30 to 7:00 pm;
- Cook Park Recreation Center, June 4, 2019 from 6:30 to 8:00 pm;
- Montbello Recreation Center, June 10, 2019 from 6:00 to 7:30 pm; and
- Aztlan Recreation Center, June 17, 2019 from 6:00 to 7:30 pm.

In total 16 people attended the community meetings, including families, stakeholders, residents, and community advocates.

Residents in Globeville/Elyria Swansea discussed the need for affordable family housing—particularly housing that is both affordable to households earning less than 30 percent of AMI and accommodates families with children (more than 1 bedroom).

Participants in Montbello discussed the need for better neighborhood support, training (i.e. financial literacy and wealth building), community counseling centers, and better notifications of city events to inform the community. Participants emphasized the need to “activate the community” and suggested that any future notifications for events or opportunities be sent to community leaders to distribute for better turn out.

Participants at the Cook Park meeting identified housing and homelessness at critical needs in the city. They also discussed the need for additional fair housing education and testing and programs that address the full spectrum of housing needs from homelessness to homeownership. The group also talked about provision of services and the need for better coordination and communication among non-profit partners and city departments to improve efficiency in service delivery. Specific examples that came up were healthy food access and childcare—these issues relate to a number of initiatives in the city and it is difficult to understand where the niche needs are without knowing what each entity is doing to provide services.

Participants at Aztlan Rec Center meeting focused on needs related to involuntary displacement and expressed a desire for that issue to be a priority for the city. Attendees also discussed the need for the City to leverage funds as much as possible by combining federal, local, and private dollars when possible.

Suggestions for priorities and solutions at the public meetings included:

- Improve access to block grants for neighborhood groups and for community organizing;
- It is important for the City to understand the impact of investments and to work to mitigate the negative impacts in a way that is tailored to a specific community/neighborhood and the household types/needs within it;

- Similarly, it is critical that the city continue to evaluate the efficacy of its programs and incorporate lessons learned into new initiatives (e.g., lessons learned from losing IHO units);

- Focus on mixed income rental housing (figure out how to make mixed income LIHTC deals work financially)

- Conduct fair housing education and testing;

- Use innovative strategies to curb displacement: anti-displacement vouchers, anti-displacement overlay zones, and/or displacement impact fees;

- Reduce duplication in service provision and improve communication/coordination among and between non-profit partners and city departments;

- Promote home sharing as a solution for both elderly owners and low income renters;

- Provide financial counseling for residents;

- Prioritize assistance to households earning less than 30 percent of AMI—particularly families;

- Leverage funds to maximize impact; and

- Improve notifications related to rezones that are likely to impact surrounding neighborhoods (i.e. earlier notice, include renters and owners in notices, and include local non-profits and community organizations).

In addition to the community meetings discussed above, the City welcomed written public comments during the public comment period between May 31, 2019 and July 1, 2019. Only one written comment was received and it is attached in its entirety (with personal information removed) to this Appendix.
June 13, 2019

TO: Denver Office of Economic Development and Opportunity
FROM:
RE: Comments on Denver Consolidated Plan, 2019 Action Plan, and Fair Housing Analysis

Short Term Priorities
The highest priority and emphasis needs to be renter housing needs and homelessness.
Fund allocation for homelessness and rental housing needs to be at the high end of proposed range or even higher.
Implement with great urgency new initiatives recently announced to improve and expand response to homelessness through enhanced and expanded day centers and emergency shelter. Recommended actions, in coordination with MDHI, to deal with unhoused individuals and families, include increased street outreach and overcoming barriers that make unhoused persons reluctant to enter shelters, including personal safety.
Denver must provide a safe, reasonable alternative to homeless persons so that homeless persons and families do not need to congregate on the street and in public spaces and to set up semi-permanent camps.
Include funding of programs for homeless prevention and other short term housing strategies for renters that emphasizes:

- Eviction counseling and legal services;
- Payment of rent and utility arrears, where long term stability likely
- Relocation and moving expense funding where re-housing will reduce costs and achieve stability
- Short to medium term rent subsidy

Accelerate to the maximum extent possible the reorganization and integration of homeless and housing programs, with an adequate number of trained staff.

Limit resources for home ownership assistance and rehabilitation for existing home owners to emphasize assistance to renters and homeless.

Longer Term Priorities
Use recently added resources, local and state, to expand and retain stock of affordable rental housing. Allocate resources and ensure policies and standards that will:

- Maximize development and retention of affordable 3 bedroom rental units for families.
• Create mixed income rental developments to the extent feasible while retaining emphasis on serving households with income at 50 percent and 30 percent of AMI.

Consider effective strategies to achieve long term financial feasibility for mixed income rental development, including:

• Maximize use of project based vouchers
• Provide alternate funding to LIHTC for units designated to serve households above 60 percent AMI, which could include:
  o Use of CDBG or HOME funding for units serving households from 60-80 percent AMI (while maintaining compliance with HOME requirement that 90 percent of new rental units serve households at or below 60 percent AMI).
  o Allow CDBG funds that qualify under the “blight” national objective to finance units that serve household above 80 percent AMI
  o Allocate other non-restricted fund sources for units occupied by households above 80 Percent AMI (up to 100 or even 120 percent of AMI).

Continue to limit resources for homeownership assistance to emphasize meeting the need for affordable rental housing.

For the limited resources used for homeownership assistance, implement the following policies and procedures:

Provide rigorous screening and counseling, even beyond minimums prescribed (such as HOME and NSP) to help ensure success and sustainability for households receiving assistance.

Institute sound underwriting and program policies that include:
• Appropriate minimum financial commitment to homeownership by the assisted household;
• Determination of the amount and terms of subsidy that is neither too generous nor too limited;
• Reasonable periods of required occupancy as the principal residence of the assisted household;
• Clear financial consequences for failure to meet the required period of principal residency based on recapture (and reuse) of financial assistance provided.

Based on the recent history of problems, avoid use of complex and cumbersome restrictions on resale (sales price and purchaser income) to enforce principal residency obligation.

Include thorough inspection of the unit to be purchased by the assisted household to ensure both health and safety and financial sustainability. Ensure that any health and safety issues are addressed prior to occupancy.

In addition, carefully evaluate primary systems that may create issues for the new owner, including roof, foundation, electrical, HVAC, and hot water. Even where no immediate deficiencies noted but where limited useful life remains, consider providing additional financing to replace or repair primary systems. By including assistance to address primary system issues, the owner will be more likely to succeed, since this will minimize the potential of significant expenses for repairs in the early years of occupancy.
Program Management and Oversight

Develop plans for implementation and oversight of affordable housing and homeless programs, recognizing the specific long term requirements of each funder and funding source.

Accelerate the recruitment of staff to achieve and maintain an enhanced rate of implementation and ensure effective program oversight.

Affirmatively Furthering Fair Housing

Recognize the actions of real estate agents and rental housing management staff as a potential source of housing discrimination, even if not overt or even unintended. Promote regular professional education for housing industry staff on policies and procedures that promote fair housing compliance and limit discriminatory tendencies and practices.

Use carefully trained and properly managed housing testers to identify instances of housing discrimination.

In developing housing to serve lower income households, apply the principles of the HUD Site and Neighborhood Standards to ensure that households with limited income, and particularly those in the protected classes covered by the Fair Housing Act, have housing location choices available to them.
APPENDIX B.

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE: COMMUNITY PARTICIPATION
Appendix B.
Regional Analysis of Impediments to Fair Housing Choice: Community Participation

The Regional Analysis of Impediments to Fair Housing Choice (AI) was completed with an extensive community engagement process. Findings from the AI community engagement process were considered in the development of Denver’s 2019 Consolidated Plan.

Methods of engagement included a resident survey; resident focus groups; stakeholder focus groups; pop up engagement at legal clinics, day labor sites, and day shelters; presentations at policymaker meetings; and two large community meetings. This resulted in engagement of nearly 6,500 residents and stakeholders. Findings from this engagement, in addition to the quantitative analysis conducted for the study, were used to identify impediments and determine the highest priority fair housing issues.

Many partners assisted in promoting the survey, focus groups, and community meetings. The study team would like to sincerely thank Warm Cookies of the Revolution, Community Language Cooperative, Molina Speaks, Project Voyce, DRIVE, Shop Talk Live, The Center, ADAPT, Atlantis Communities, Emily Griffith Technical College, Jewish Family Services, Denverite, and others we may have missed. Your participation was critical to a meaningful process.

This section discusses provides detail on the engagement process and representation of typically underrepresented residents, members of protected classes, residents most vulnerable to housing and economic barriers, and policymakers and community leaders. It is organized by type of engagement.

The top findings and needs that arose as part of the engagement are interwoven into the report sections. Appendix C contains detailed results from the resident survey.

Engagement opportunities included:

- **Resident survey**—Surveys were received from nearly 6,000 residents in Denver, Aurora, and the Boulder Broomfield Consortium, representing all types of protected classes and many different housing situations. By geography, approximately 2,000 surveys were received by Denver residents, 800 from Aurora residents, 650 from City of Boulder residents, 150 from Broomfield residents, 600 from Longmont residents, and 450 from residents in other areas of Boulder County. Another 500 residents participated from the broader Denver-Boulder region.

  Approximately 1,000 survey respondents were residents with disabilities, 850 were households living below the poverty level, 250 were Housing Choice Voucher holders, 150 had limited English proficiency, and 150 were living in precarious situations (short term
motels, shelters). 350 represented large households and 1,250 had children living in the home.

- **Resident focus groups**—350 residents participated in-depth discussions about their housing challenges. These groups primarily represented immigrants, Spanish speakers, African Americans, families with children, persons with disabilities, LGTBQ residents, and at-risk youth.

- **Stakeholder focus groups**—Policy and thought leaders attended focus groups dedicated to discussing equity and challenges in education; job training, employer needs, employee
recruitment; providing housing and services to persons experiencing or at-risk of homelessness; access to housing and services for persons with disabilities, and human rights.

- **Pop up engagement**—To round out resident engagement and ensure that protected classes were represented, the study team visited day labor sites, ethnic food markets, the St. Francis Day Shelter, central libraries, food pantries, and mobile home parks in rural areas to have conversations with residents about their housing challenges and distribute surveys.

- **Community meetings**—The study culminated in two large, interactive, community celebrations and discussions of housing needs, attended by more than 150 residents representing many cultures, traditions, languages, family types, and races and ethnicities. Translations were offered in Spanish, Somali, Pashtun, Burmese, French, and Kareni.

In addition, a website was created for the study to keep residents and stakeholders updated about the process, communicate opportunities to get involved, provide access to the resident survey, and make the draft report available.

The website was available in five languages in addition to English. More than 2,000 residents accessed the website and used the translation features.

**Promotion of engagement opportunities.** The above engagement opportunities were promoted extensively through postings on city and county websites and social media, press releases, and advertised in flyers dropped in neighborhood markets. In Longmont, for example, residents were notified of engagement opportunities through weekly emails sent to residents who signed up to receive such notifications. The survey link appeared in weekly City of Denver employee bulletins. Some Denver City Council members posted the availability of the survey and information about the AI effort in their emailed newsletters.

Kickoff events held in Boulder and Aurora brought regional stakeholders in affordable housing provision, human services, civil rights and other interested advocates together for an informational presentation about the study and to encourage attendees to participate in the public engagement and promote the survey to their clients, consumers and allies. More than 50 stakeholders participated and video of each meeting was available on the study website.

Cities and the county also sent surveys and notifications about meetings to local nonprofits that serve target populations and made surveys available at city senior centers, neighborhood service windows, and through neighborhood groups/registered HOAs. Examples include distribution of survey flyers at a Montbello Community Forum, Boulder County Homeowners Training English and Spanish-language classes, Longmont Mental Health First Aid classes, and providing survey materials and packets to nonprofits. The City of Aurora promotions of the survey included a news segment on the Aurora News Weekly broadcast airing on Comcast Channel 8 in Aurora (https://www.auroratv.org/News/News.html?show=6047);

In the Boulder Broomfield Consortium, the survey was also promoted through Boulder County Homeownership Training classes (both English and Spanish classes) and Mental Health First Aid classes.
Public housing authorities held meetings with residents to get their input, made surveys available at their front offices and properties, and emailed residents about the availability of the survey (all PHAs). These efforts reached more than 5,000 households who receive publicly assisted housing or are on the wait and interests lists.

The Denver Metro Fair Housing Center and National Fair Housing Alliance placed ads in area Spanish-language newspapers and neighborhood publications and blasted information about the study to their networks.

The local online publication Denverite ran an article about the study and opportunity to participate through the survey. Channel 8 dedicated one of its April arts and culture segments to the community meetings (https://denver8.tv/arts-culture/)
DENVER, AURORA, & BOULDER

Why do you live where you live? Denver needs to know, so take this survey

Erica Mathew // Follow
November 21, 2017 // 4:08 pm // Denver news

Do you own your home or are you sleeping on a friend’s couch? Did you choose your house or apartment because you love the walkable, bikeable neighborhood? Or because the landlord would overlook an old felony conviction? Or because you have a disability and it was accessible?

To take the Assessment of Fair Housing survey is to be forced to think about inequality and where you fall on the spectrum of limited opportunities.

The survey is part of a regional assessment of Denver’s housing stock, which is meant to identify housing challenges in the city. It’s required by the U.S. Department of Housing and Urban Development’s Fair Housing and Equal Opportunity Act. The survey is not associated with a tenant or landlord at all.

The survey administration is handled by Buro Happold, a national consulting firm that was hired by the City and County of Denver.

For more information about the study, visit https://www.surveymonkey.com/s/AFH Housing.

The survey administration is handled by Buro Happold, a national consulting firm that was hired by the City and County of Denver.

The survey takes approximately 15 minutes and is available online in eight languages.

The survey includes questions on demographics, housing characteristics, and access to transportation and services. It also asks about housing preferences and barriers to finding affordable housing.

The data from the survey will be used to inform policy decisions and support the development of affordable housing plans in Denver.

If you have any questions or concerns about the survey, contact the Denver Metro Fair Housing Center at 303-576-8010 or info@afhdenver.org.

For immediate release

City and County of Denver
Office of Economic Development
Derek Woodyard
Community Development Specialist
C. 303-856-0845

dwoodyard@denvergov.org

Resident Input Sought for Regional Housing Study

Regional assessment includes Denver, Aurora, Boulder, Broomfield and Longmont

DENVER, CO – Monday, November 21, 2016 – The City and County of Denver is among the nine municipalities working jointly on an analysis called the Assessment of Fair Housing. A public survey is being administered now through December 30, 2017, to better understand residents’ housing decisions and experiences buying, renting, and going to school in the region.

The survey takes approximately 15 minutes and is available online in eight languages.

Additional accommodations are available by request for those with language or mobility needs. If you have questions about the survey, contact the Denver Metro Fair Housing Center at 303-576-8010 or info@afhdenver.org.

The Assessment of Fair Housing study is required by the U.S. Department of Housing and Urban Development’s Fair Housing and Equal Opportunity Act to conduct an assessment of fair housing conditions and a plan to address any discriminatory housing practices.

The Assessment of Fair Housing study is required by the U.S. Department of Housing and Urban Development. The survey is not associated with a tenant or landlord at all. It is designed to help communities determine if there is evidence of discrimination.

The survey is part of a regional assessment of Denver’s housing stock, which is meant to identify housing challenges in the city. It’s required by the U.S. Department of Housing and Urban Development’s Fair Housing and Equal Opportunity Act. The survey is not associated with a tenant or landlord at all.

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Resident Survey

As discussed previously, respondents to the resident survey represent the demographic and socioeconomic spectrum of regional residents, as well as their individual communities of residence. Residents were asked about a variety of housing and community development challenges in the survey. Through the survey, the study captured information on residents’:

- Reasons for choosing their housing type and location,
- Barriers to changing their housing situation,
- Greatest worries about their housing situation,
- Primary housing challenges,
- If they have experienced discrimination,
- Knowledge of resources to assist with perceived housing discrimination,
- Ability to get an accommodation for a disability, as needed, and
- Opinions on equitable distribution of quality schools, parks and recreation facilities, and neighborhood amenities.

The survey was available from November 1, 2017 through January 30, 2018.

Language access and reasonable accommodations. The survey was available in online and postage-paid paper formats in seven languages: Amharic, Chinese, English, Korean, Russian, Spanish and Vietnamese, as were the promotional flyers. In addition to the formal translations, volunteers with Jewish Family Services helped Arabic speakers complete the survey.

The surveys and promotional flyers included contact information to request a reasonable accommodation for residents with a disability, and the online survey system used is Section 508 compliant. An Aurora resident who is deaf requested the assistance of an ASL interpreter to participate; BBC provided the interpreter and conducted the survey with the resident in-person at BBC’s offices.

Resident Focus Groups

In depth discussions about housing challenges were held with the following protected classes:

11/13/17—Residents of the Village at Westerly Creek (Aurora Housing Authority properties residents)

11/23/17 – Residents attending Denver Central Library coffee hour (many experiencing homelessness)

11/27/17 – Residents living in the Westwood neighborhood of Denver
12/5/17 – Residents living in the Cole and Five Points neighborhoods of Denver

12/7/17 – Residents seeking services at the Aurora Economic Opportunity Coalition (conducted in Spanish)

12/7/17 – Residents seeking employment at the Day Labor Center (conducted in Spanish)

12/13/17 – Residents at the St. Francis Day Shelter

12/15/17 -- Residents living in the Montbello neighborhoods of Denver

1/3/18 – Residents with disabilities at Atlantis Communities

1/3/18 – LGBTQ teenagers and young adults at The Center

1/17/18 – Residents at Mi Casa resource center (conducted in Spanish)

**Resident Groups Represented in Resident Focus Groups**

<table>
<thead>
<tr>
<th>Residents in Attendance</th>
<th>353</th>
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<tbody>
<tr>
<td>Hispanic</td>
<td>160</td>
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<tr>
<td>African American</td>
<td>64</td>
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<tr>
<td>White</td>
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<td>Native American</td>
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<tr>
<td>Asian</td>
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<td>Middle Eastern</td>
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<td>Persons with Disabilities</td>
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<td>Limited English Populations (LEP)</td>
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<tr>
<td>Families with Kids</td>
<td>52</td>
</tr>
<tr>
<td>Persons Experiencing Homelessness</td>
<td>27</td>
</tr>
</tbody>
</table>

Source: BBC Research & Consulting.

**Stakeholder Focus Groups**

In depth discussions about policy solutions to housing and economic barriers were held with:

12/20/17 – Stakeholders who work with persons experiencing homelessness

1/4/18 – Stakeholders who work with persons with disabilities and elderly

1/4/18 – Stakeholders who work the K-12 education sector

1/12/18 – Stakeholders who work in the employment and job training industries
Home...Bigger than Houses Community Meetings

Discussing housing challenges—particularly the experience of discrimination—can be difficult for residents. For some, their experiences are embarrassing, particularly if they occurred in front of family members (e.g., being evicted while the children were at home). Others may feel hopeless and scared. Some are angry. Some cultures are not accustomed to sharing personal information about economic challenges. Indeed, many residents cried when describing their situations or discussed their situations with much hesitancy when in the focus groups.

The community meetings for this study took a different approach—they were about solutions, about hope. They celebrated the diverse and rich cultures in the region, and, most importantly, cultivated cross-pollination of ideas to address housing and economic needs.

The meetings were held on Saturdays in February in West Denver and West Aurora/East Denver. These locations represented racial and ethnic and poverty concentrations, as well as neighborhoods that are vulnerable to economic changes and potential displacement of long-time residents.
Residents engaged in small focus groups and participated in activities to tell their housing stories. Activities included:

- Communicating hopes, dreams, fears, and stories about housing and neighborhood challenges through visual art;

- Participating in break out groups to discuss housing solutions, ask questions about city policies and budgeting, discuss innovative solutions such as land trusts and community credit models, receive information about fair housing resources;

- A variety of musical and dance artists including refugee choirs, traditional Chinese dancing, reggae, spoken word, and poetry;

- Activities and child care for children; and

- Food from local vendors.

Source: BBC Research & Consulting.
Residents’ Housing Sentiments Captured at Community Meetings

The following videos capture the rich level of engagement and major themes from the meetings:

Home Bigger than Houses – Westside

https://vimeo.com/257041888
The housing solutions presentation delivered at the events is appended to this section.

**Stakeholder partnerships.** BBC developed a Community Engagement in a Box tool for use by stakeholders to build capacity to engage their clients, consumers and coalition members in the AI (then AFH) process through promoting and distributing the resident survey, facilitating community conversations and focus groups, sharing the AFFH-T maps and using all of the community engagement tools available to participating jurisdictions. Interested stakeholders could request a Box which included printed surveys in each of the four languages; flyers promoting the online survey, a booklet of AFFH-T maps and instructions for interpreting the maps; and a community conversations discussion guide.

BBC facilitated a two in person meetings and taped the sessions for participating stakeholders to learn about how to support the CE process. Links to the taped sessions can be found at:

The figure below recognizes the organizations, agencies and coalitions that participated in making the regional AI community participation process a success. In addition to lending their subject-matter expertise to the AFH development, participating organizations promoted resident engagement opportunities to their clients, consumers and coalition members; tirelessly distributed surveys; recruited focus group participants; and encouraged residents to attend the community open house events.
### Participating Stakeholder Organizations

**Note:** Participating organizations were identified through stakeholder kickoff meeting sign-in sheets, receipt of Community Engagement in a Box materials or webinar participation, participation in conference calls, focus group hosts or recruiting support and as signatories to communications providing guidance for the community engagement process.

**Source:** BBC Research & Consulting.

<table>
<thead>
<tr>
<th>Stakeholders Participating in AI through Focus Groups, Survey Distribution, Interviews</th>
<th>Population Served or Fair Housing Focus</th>
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<tbody>
<tr>
<td>9 to 5 Denver</td>
<td>Low income, immigrants</td>
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<td>The Delores Project</td>
<td>Persons experiencing homelessness</td>
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<td>Denver Housing Authority</td>
<td>Low income</td>
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<td>Denver Metro Fair Housing Center</td>
<td>All Protected Classes</td>
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<tr>
<td>Denver Public Library</td>
<td>Low income/homeless</td>
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<tr>
<td>Denver Public Schools</td>
<td>Low income families/at-risk youth</td>
</tr>
<tr>
<td>Disability Commission (Denver)</td>
<td>Persons with disabilities</td>
</tr>
<tr>
<td>Donnell Kay Foundation</td>
<td>Education</td>
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<tr>
<td>East Area Plan</td>
<td>Neighborhood planning</td>
</tr>
<tr>
<td>Emily Griffith Technical College</td>
<td>Employment and education</td>
</tr>
<tr>
<td>Front Range Community College</td>
<td>Employment and education</td>
</tr>
<tr>
<td>Goodwill Industries</td>
<td>Low income</td>
</tr>
<tr>
<td>Longmont Housing Authority</td>
<td>Low income</td>
</tr>
<tr>
<td>Mental Health Center of Denver</td>
<td>Mental health</td>
</tr>
<tr>
<td>Mental Health Partners of Boulder/Broomfield Counties</td>
<td>Mental health</td>
</tr>
<tr>
<td>New America School</td>
<td>Immigrants/education</td>
</tr>
<tr>
<td>One Colorado/One Colorado Education Fund</td>
<td>LGBTQ</td>
</tr>
<tr>
<td>Open Door to Success Director Open Ministries</td>
<td>Low income</td>
</tr>
<tr>
<td>Rocky Mountain MicroFinance Institute</td>
<td>Small business development</td>
</tr>
<tr>
<td>Safe Shelter of St. Vrain</td>
<td>Persons experiencing homelessness</td>
</tr>
<tr>
<td>St. Francis Center</td>
<td>Persons experiencing homelessness</td>
</tr>
<tr>
<td>Thrive Center</td>
<td>Persons with disabilities</td>
</tr>
<tr>
<td>United for a New Economy</td>
<td>General equity</td>
</tr>
<tr>
<td>University of Denver</td>
<td>Persons experiencing homelessness</td>
</tr>
<tr>
<td>Veterans Administration</td>
<td>Persons experiencing homelessness</td>
</tr>
<tr>
<td>Volunteers of America</td>
<td>Persons experiencing homelessness</td>
</tr>
<tr>
<td>Westwood neighborhood organization</td>
<td>Latinos, immigrants</td>
</tr>
<tr>
<td>Women’s Bean Project</td>
<td>Low income women</td>
</tr>
<tr>
<td>Women with a Cause Foundation</td>
<td>Single mothers</td>
</tr>
</tbody>
</table>
Website

A website was created and was live during the AI development to:

- Provide information about the purpose of the study and the participating jurisdictions and PHAs;
- Share the videos of the stakeholder kick off events (for those who could not attend);
- Share HUD resources, including the AFFH data and mapping tool and a custom matrix to assist with interpretation;
- Make the resident survey available;
- Make the draft report available; and
- Link to fair housing resources for residents who think they have experienced discrimination.

http://denver-aurora-boulderafh.com/
The website was available in five languages in addition to English. More than 2,000 residents accessed the website and used the translation features.

**Policy Briefings**

Findings from the Regional AI were presented to the Denver Human Rights Commission; Boulder City Council; City of Aurora Housing Committee; and to the broad policy community as part of the Regional Housing Summit in May 2018, sponsored by the City and County of Denver Office of Economic Development.

Appended to this section is one of the presentations used in the community meetings and policy briefings to describe the primary findings from the AI and to facilitate a discussion on community solutions.
Appendix C

Citizen Participation Plan
Citizen Participation Plan

**Citizen Participation Plan.** The City believes that safe and supportive neighborhoods strengthen families. The City’s Citizen Participation Plan is based on the view that residents play an important role in improving the quality of life in their neighborhoods and, therefore, encourages residents to become involved in the Consolidated Plan process. When people become involved in their neighborhood and the Consolidated Plan process, they become an important force to improving neighborhoods.

The Citizen Participation Plan is also intended to fill a requirement by the U.S. Department of Housing and Urban Development (HUD), which sets forth the City’s policies and procedures for public involvement in the Consolidated Plan process and the use of the:

- Community Development Block Grant (CDBG),
- HOME Investment Partnerships Program (HOME),
- Emergency Solutions Grant (ESG), and
- Housing Opportunities for Persons With AIDS (HOPWA).

To receive these federal grant monies, HUD requires jurisdictions to submit a Consolidated Plan every three to five years. This Consolidated Plan covers a five-year timeframe from January 1, 2013 through December 31, 2017. The City’s Consolidated Plan is a comprehensive strategic plan for housing and neighborhood development activities. The purpose of programs and activities covered by this Consolidated Plan is to improve the Denver community by providing decent housing, a suitable living environment, and growing economic opportunities, especially for low-to moderate-income residents.

**Purpose of the Citizen Participation Plan.** The Citizen Participation Plan (CPP) describes the process the City uses to collect public input and involve the public in development of the Five-Year Consolidated Plan. The CPP also addresses how the City obtains public comment on its Annual Action Plan and Consolidated Annual Performance Evaluation Report (CAPER). This Citizen Participation Plan was developed in accordance with Sections 91.100 and 91.105 of HUD’s Consolidated Plan regulations.

**Coordination with other efforts.** The City of Denver, Division of Housing and Neighborhood Development (HAND), has been laying the foundation for the new Five-Year Consolidated Plan through development of several supporting efforts. The efforts most closely related to the Consolidated Plan include the Neighborhood Revitalizations Strategy, Denver’s Road Home, Blueprint Denver, and the Denver Housing Plan.

Denver’s approach to citizen participation is focused in neighborhoods with the greatest needs and is comprehensive and inclusive. Denver agrees with the concept of building and strengthening partnerships. The City collaborates on housing and neighborhood development programs with the Housing Authority of the City and County of Denver (DHA), Denver Human
Services, and numerous other city agencies. Denver works in a collaborative partnership with service providers, other federal/state government agencies and the private sector on all community development programs. The City believes that good collaboration and coordination of programs, services and budgets will result in healthier communities.

**Encouraging Citizen Participation**

The City recognizes the importance of public participation in both defining and understanding current housing and neighborhood development needs and prioritizing resources to address those needs. The City’s Citizen Participation Plan is designed to encourage citizens of Denver equal access to become involved each year.

**Development of the Plans and Performance Report**

This document outlines how members of the Denver community may participate in the development and review of the City’s Five-Year Consolidated Plan; each annual Action Plan; each Annual Performance Report; and any substantial amendments to a Consolidated Plan and/or Action Plan. The City of Denver’s program/fiscal year begins January 1 and ends December 31. The City’s Division of Housing and Neighborhood Development (HAND) under the Office of Economic Development (OED) is responsible for implementing and reporting on the all aspects of the Consolidated Plan process. The following schedule provides an approximate timeline for the Consolidated Plan, which happens every five years, the annual Action Plan and the CAPER.

| January       | Begin annual Action Plan year |
|              | Begin Consolidated Annual Performance and Evaluation Report (CAPER) process |
| February      | At the end of month publish CAPER Public Notice of draft availability for public comment |
| March         | Beginning to middle of month begin 15-day Public Comment period for CAPER CAPER submitted to HUD by March 31 |
| May-June-July | Hold public meetings for Consolidated Plan and annual Action Plan |
|              | Middle of July release Request for Funding (RFF) for annual contracts |
| August        | Request For Funds (RFF) due, date to be determined |
|              | Review funding requests |
| September     | Publish Public Notice informing public the draft Consolidated Plan/annual Action Plan are available for public comment |
|              | Contact all public meeting participants about the availability of the draft plan(s) |
| October       | Begin 30-day Public Comment period for draft Consolidated Plan and draft annual Action Plan |
| November      | Consolidated Plan and Action Plan submitted to HUD by November 15 |
| December      | End of annual Action Plan year |
**Annual Action Plan.** Each year the City must submit an annual Action Plan to HUD, reporting on how that year’s funding allocation for the HUD entitlement grants will be used to achieve the goals outlined in the Five-Year Consolidated Plan.

Citizen/agency input. HAND staff holds at least two public hearing to describe the City’s proposed allocation of the program year’s funding allocation. The hearing is a detailed description of the programs, agencies, organizations and respective funding proposed by the City.

Draft Action Plan. A reasonable written notice is given to announce to the public the availability of the draft Action Plan. Availability of the draft Plan is advertised on the City’s website, along with Public Service Announcements on Denver’s Channel 8.

The draft Action Plan is available for 30-days to gather public comment on the proposed spending allocation.

Final Action Plan. The HAND staff reviews and considers all written public comments. The final Action Plan that is submitted to HUD includes a section that summarizes all citizens’ comments or views in addition to explanations of why any comments were not accepted.

**Consolidated Annual Performance and Evaluation Report (CAPER).** The City is required to submit by March 30 a CAPER to HUD that describes the City’s progress in meeting the goals in the Consolidated Plan and Annual Action Plan. Prior to submitting the CAPER to HUD, the City makes available to interested parties the proposed CAPER for a comment period of no less than 15 days. The public is notified of the CAPER’s availability through newspaper notification in an area newspaper. A reasonable notification is published to announce the beginning of the CAPER public comment period.

The City reviews and considers all public comments received in writing, or orally at public hearings, if any, in preparing the CAPER. The final CAPER submitted to HUD includes a summary of these comments or views.

**Substantial Amendments to Consolidated Plan/Action Plan.** Occasionally changes occur during the year to warrant an amendment to the Consolidated Plan and/or Action Plan.

Criteria. The criteria for whether to amend is referred by HUD as “Substantial Amendment Criteria.” These Substantial Amendments apply only to changes in CDBG funding allocations. Changes in funding allocation for other HUD grant programs received by the City—HOME, ADDI, ESG, HOPWA—are not required to secure public review and comment. The City considers the following conditions to be Substantial Amendment Criteria needed to amend the Consolidated Plan and Action Plan and projected use of fund:

- A new program or project activity is proposed for funding that was not previously identified in the Consolidated Plan and Action Plans;

- A program that was listed in the Consolidated Plan or Action Plan is eliminated during the program year; and
• A program that was listed in the Consolidated Plan or Action Plan is eliminated during the program year; and

• The City increases/decreases funding for a listed project or program area by more than 50 percent.

Procedure. In the event of a substantial amendment citizens will be notified of the substantial amendment’s availability through newspaper notification of the 30-day public comment period. The notification will appear in an area newspaper. The notice of the substantial amendment will summarize the programs involved and the nature of the substantial amendment to be implemented. The notice will identify where the complete substantial amendment(s) can be viewed and will advise the citizens that there will be a 30-day public comment period.

All comments received in writing or orally at the public hearing, if any, will be considered, and if deemed appropriate, the City shall modify the amendment(s). A summary of these, and a summary of any comments not accepted and the reason therefore, shall be attached to the substantial amendment(s) of the Consolidated Plan and/or Action Plan.

Amendments to Citizen Participation Plan. In the event that changes to this Citizen Participation Plan are necessary, the HAND staff shall draft them. After reasonable notice, the amendment(s) will be available to the public for 15-days for written comment. All comments received in writing will be considered, and if deemed appropriate, the HAND staff shall modify the amendment(s).

General Requirements

Public Hearings/Meetings. The City’s citizen participation plan encourages the inclusion of all City residents during the Consolidated Plan and annual Action Plan development process, especially low- to moderate-income residents who are the primary clients for HUD programs. There are many opportunities for public involvement through meetings, workshops and hearings.

At least two public hearings are held each year to obtain views of citizens, public agencies, and other interested parties on housing and community development needs, development of proposed activities, and review of program performance. The public hearings are conducted at a minimum of two different stages of the program year. The City and County of Denver’s HAND holds at least one of these hearings before the proposed Consolidated Plan is published for public comment.

In addition to the required public hearings, the City may use alternative methods to encourage citizen participation. Public meetings, surveys, stakeholder group meetings, open houses, and workshops may be used to solicit citizen input.

HAND staff holds special public meetings in the target neighborhoods as identified in the Neighborhood Revitalization Strategy and the Consolidated Plan and Action Plans. These meetings focus on topics of special interest to the neighborhood, the general public or the agency, and are held in effort to obtain feedback about ideas prior to the publication of plans or documents. The City continues to work regularly and informally with the nonprofit
organizations, services providers, businesses and other groups, and individuals to make sure there is on-going communication. Neighborhoods in target neighborhoods are the primary beneficiary.

Hearings/meetings that occur require at least two weeks notification. Public hearing/meeting notifications are placed in local neighborhood newspapers, newsletters, flyers or a combination. Notification is also provided on the City’s web page (www.denvergov.org/oed). As mailing lists are established, they are used to provide direct notification through the mail and email. The City also consults and coordinates with the Denver Housing Authority and Denver Human Services during the development of the Consolidated Plan and annual Action Plan.

Notification of Participation Activities:

**Required**: Public Notices for Community Meetings and Public Hearings shall be published on the City’s official website: [www.denvergov.org/oed](http://www.denvergov.org/oed). In addition the Office of Economic Development will send a press release. Public Notices shall be published for not less than two weeks (14 days) prior to any meeting/hearing. (Other notice periods are specified as required by the particular grant program). In addition, a press release will be sent with a distribution list of all current, previous contacts. Flyers will also be distributed to current contractors to share with the public.

**Location**. Public hearings/meetings will be conveniently timed and located so as to ensure the maximum participation by people who might or will benefit from program funds. All public hearings are held at locations accessible to people with disabilities. Translation for non-English speaking residents and/or those who are hearing impaired will be provided when requests are made at least five business days’ prior to a hearing.

**Document access**. HAND publishes the Consolidated Plan/Action Plan summary of priority programs and preliminary budget, the availability of the CAPER and announces substantial amendment(s) on the City’s website [www.denvergov.org/oed](http://www.denvergov.org/oed) and sends a press release to notify citizens, service providers and nonprofit organizations of the availability of documents. A reasonable notice of their availability is provided.

The notification also encourages the public to review and comment on the draft Consolidated Plan/Action Plan during the 30-day public comment period, the draft CAPER during the 15-day comment period and the substantial amendment(s) during the 30-day comment period.

The Consolidated Plan, Action Plan, CAPER and substantial amendment(s) documents are made available at the main public library, the Denver Housing Authority Administration Building, Denver Human Services, HAND and on the City’s web page [www.denvergov.org/oed](http://www.denvergov.org/oed). Upon request, these documents are provided in a form accessible to persons with disabilities. Citizens, groups, and other interested organizations may obtain hard copies of the plans, performance report and/or amendment(s) by calling HAND at (720) 913-1999. The copies are free of charge and limited to one per individual or business.

Denver notifies adjacent jurisdictions about priority non-housing community development needs and will continue to work with the metro area on homeless issues and HIV/AIDS issues and solutions.
Access to information/records. The City provides reasonable and timely access for citizens, public agencies, and other organizations to access information and records relating to the City’s Consolidated Plan, annual Action Plan, performance reports, substantial amendment(s), Citizen Participation Plan, and the City’s use of assistance under the programs covered by the plan during the preceding five years.

The City and County of Denver’s web page is www.denvergov.org/oed for citizens interested in obtaining more information about city services and programs or to review the plans and performance reports.

Optional: City communications:

Notification on the City’s Cable Television station’s “Bulletin Board” and/or “Cable Television” (Channel 8) which reaches approximately 25,000 households (62% of the Westminster households).

The City reserves the right to adjust optional methods of notification depending upon which methods have proven to be the most cost effective in reaching the widest number of citizens, particularly low to moderate income residents.

Comments/complaints. The public may provide comments and complaints related to any HUD program. Written public comments and complaints can be mailed to 201 West Colfax Avenue, Department 204, Denver, Colorado, 80202 or by email to ConsolidatedPlan@denvergov.org. HAND can also be reached by fax at (720) 913-1800.

Written complaints must clearly state the complainant’s name, address, and zip code. A daytime phone number or email should also be included in the event further information or clarification is needed. HAND will provide a timely, substantive written response to every written complaint, within 15 days of receipt.

Technical assistance. The City can provide technical assistance to groups representative of the target neighborhoods or other low-income areas that request such assistance for the preparation of funding proposals to the greatest extent possible. Technical assistance may consist of workshops, one-on-one assistance, or information and referral. When the City initiates a request for proposals, it provides a pre-application or bidders workshop to ensure all organizations are aware of the opportunities and limits of the funding source. The City’s provision of technical assistance does not include the preparation of grant applications for individuals or organizations. The City’s provision of technical assistance can be limited by funds and staff availability.

DHA Public Participation. DHA provides for public participation in the development of their agency annual plan process and five-year Capital Fund Program (CFP) process. The Agency Plan stipulates the mission, goals, objectives, and policies for DHA, any and all projected capital improvements, redevelopment, relocation, renovation, rehabilitation, modernization and management improvements for public housing developments. Examples of topics include: policy’s include, but not limited to: Admissions and Occupancy Terms, Section 8 Administrative Plan Annual Capital Fund Performance and Evaluation, and resident/public comment.
DHA, in conjunction with the Resident Council Capital Fund Committee, prioritizes capital improvement items primarily on statutory requirements as determined by HUD, health and safety of residents, infrastructure and related housing quality standards.

As such, DHA develops and solicits resident and management input into the capital needs of their respective public housing developments for development of its Capital Fund Plan and Annual Plan submission to HUD. The DHA Capital Fund Plan and Agency Annual Plan are a regular agenda item of DHA local resident councils (LRC) and the established Resident Council Board (RCB) Capital Fund Committee. Based on resident, management, LRC, and RCB input and contingent upon funding and within capital fund budget, DHA staff then incorporates recommendations within the Capital Fund Plan and Annual Plan.
Appendix D

Citizen Participation Materials
DENVER, CO — Friday, May 31, 2019 — Denver Economic Development & Opportunity and Denver Human Services are seeking public comment regarding their proposed 2019-2023 HUD Consolidated Plan and 2019 HUD Action Plan for local housing, economic development, public service, and neighborhood facilities programs that utilize federal funds, as well as the proposed Analysis of Impediments that identifies fair housing choice limitations and proposed solutions.

The draft plans, which will be submitted to the U.S. Department of Housing and Urban Development (HUD), will be posted at denvergov.org/economicdevelopment on Friday, May 31, 2019, and will be available for a 30-day public comment period through Monday, July 1, 2019.

The 2019-2023 Consolidated Plan encompasses the following federal programs: Community Development Block Grant Program, HOME Investment Partnership Program, Housing Opportunities for Persons with AIDS Program, and Emergency Shelter Grant programs. The plan includes a needs assessment, a housing market analysis, strategic plan for the five-year period, and information about the overall goals and objectives for the 2019 program year with a description of the available resources and proposed actions to address identified needs. All proposed activities and projects are intended to principally benefit citizens of Denver who have extremely low- and moderate-incomes, and populations that have special needs such as elderly, people with disabilities, homeless individuals and families, as well as individuals with HIV/AIDS.

The Analysis of Impediments evaluates barriers to housing choice and is linked to the Federal Fair Housing Act of 1968. It is designed to aid local leaders and community stakeholders in developing housing goals that will ultimately increase fair housing choice, build opportunity for all residents, and strengthen communities. A key component of the work is taking meaningful actions to affirmatively further fair housing.

For more information, please contact Rachel King at 720-913-1669. Comments may be submitted electronically to Rachel.King@denvergov.org.

Final copies of the plans will be available in Fall 2019 upon HUD approval.
FOR IMMEDIATE RELEASE

City Seeks Public Input on Draft Plans for Federal Housing and Community Development Programs

DENVER, CO — Wednesday, May 15, 2019 — Denver Economic Development & Opportunity is seeking public input and comment to its proposed 2019-2023 HUD Consolidated Plan and 2019 HUD Action Plan for local housing, economic development, public service, and neighborhood facilities programs that utilize federal funds, as well as its proposed Analysis of Impediments that identifies fair housing choice limitations and proposed solutions. Public meetings will be held on the following dates:

Thursday, May 30
5:30-7 p.m.
Johnson Recreation Center
4809 Race St.

Tuesday, June 4
6:30-8 p.m.
Cook Park Recreation Center
7100 Cherry Creek Drive South

Monday, June 10
6-7:30 p.m.
Montbello Recreation Center
15555 E. 53rd Ave.

Monday, June 17
6-7:30 p.m.
Aztlan Recreation Center
4435 Navajo St.

All three documents, the Consolidated Plan, the Action Plan, and the Analysis of Impediments, which will be submitted to the U.S. Department of Housing and Urban Development (HUD), will be available for a 30-day public comment period from May 31 through July 1, 2019 at denvergov.org/economicdevelopment.

The 2019-2023 Consolidated Plan encompasses the following federal programs: Community Development Block Grant Program, HOME Investment Partnership Program, Housing Opportunities for Persons with AIDS Program, and Emergency Shelter Grant programs. The plan includes a needs assessment, a housing market analysis, strategic plan for the five-year period, and information about the overall goals and objectives for
the 2019 program year with a description of the available resources and proposed actions to address identified needs. All proposed activities and projects are intended to principally benefit citizens of Denver who have extremely low- and moderate-incomes, and populations that have special needs such as elderly, people with disabilities, homeless individuals and families, as well as individuals with HIV/AIDS.

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Sign language interpretation and Spanish translation can be provided at the public meetings with five business days’ notice. For more information, contact Rachel King at 720-913-1669. Anyone unable to attend a public meeting may send comments to rachel.king@denvergov.org.

Final copies of the plans will be available upon HUD approval.

Denver Economic Development & Opportunity is leading an inclusive and innovative economy for all Denver residents, businesses, and neighborhoods. By supporting local and global business development, affordable housing programs, and stabilization efforts in Denver’s diverse neighborhoods, we are creating opportunity for everyone to make a home, get a job, and build a future.

###
Denver Economic Development & Opportunity is seeking public comment to its draft reports required by the U.S. Department of Housing and Urban Development (HUD).

The 2019 Federal Action Plan describes the activities that the city intends to accomplish with federally funded projects. This report provides data on the effectiveness of local housing, economic development, public service, and neighborhood facilities programs. These federal programs are funded by Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), Housing Opportunities for Persons With AIDS (HOPWA), and Emergency Solutions Grant (ESG).

The Consolidated Plan covers the period from 2019 through 2023. The Analysis of Impediments evaluates barriers to housing choice and is linked to the Federal Fair Housing Act of 1968. It is designed to help local leaders and community stakeholders develop housing goals that will ultimately increase fair housing choice, build opportunity for all residents, and strengthen communities.

All three documents will be available for comment between May 31 - July 1, 2019 at denvergov.org/economicdevelopment, click on Reports and Studies. Final reports will be available upon HUD approval.

You may also submit comments via email: rachel.king@denvergov.org
or via regular mail:
Denver Economic Development & Opportunity, Attn: Rachel King, 201 West Colfax Ave, 7th Floor, Denver, CO 80202

Other questions or needs? A sign language interpreter or Spanish language translation will be provided on request with five days’ notice prior to the scheduled meeting. Please contact Rachel King, 720-913-1669 or rachel.king@denvergov.org. Deaf or hearing impaired residents, please contact TTY 7-1-1 or 800-659-2656.
La oficina de Desarrollo Económico y Oportunidades de Denver busca contribuciones y comentarios para el borrador del reporte requerido por el departamento de Vivienda y Desarrollo Urbano de E.E. HUD por sus siglas en inglés.

El reporte anual describe las actividades que la ciudad planea lograr con los proyectos fundados por medio de recursos federales. Este plan provee información sobre la eficiencia de viviendas locales, desarrollo económico, servicio público e instalaciones de servicios públicos. Estos programas federales son fundados por el Subsidio del Bloque de Desarrollo Comunitario CDBG, la Asociación de Inversiones para la Vivienda HOME, Oportunidades de Vivienda para las personas con SIDA, HOPWA y el Subsidio de Soluciones de Emergencias ESG por sus siglas en inglés.


El análisis de impedimentos evalúa las barreras de opciones a viviendas y está conectado a la ley federal de viviendas justas de 1968. El análisis esta designado para apoyar a líderes locales e interesados en la comunidad a desarrollar metas de vivienda que ultimadamente incrementen la opción de viviendas imparciales, crear oportunidades para todos los residentes y fortalecer comunidades.

Todos los documentos estarán disponibles para comentarios entre el 21 de mayo y el 21 de junio del 2019 en denvergov.org/economicdevelopment. Dele clic a “Reports and Studies.” El último reporte estará disponible una vez que sea aprobado por HUD.

También puede enviar sus comentarios al correo electrónico rachel.king@denvergov.org, o directamente a la Oficina de Desarrollo Económico y Oportunidades de Denver dirigido a Rachel King, 201 W. Colfax Ave., Denver 80202.

¿Tiene más preguntas o necesidades? Podrá solicitar un intérprete de español o lenguaje de señas con cinco días de anticipación a la fecha de la reunión programada. Por favor contacte a Rachel King al teléfono 720-913-1669 o al correo electrónico rachel.king@denvergov.org. Aquellos residentes sordos o con impedimentos auditivos por favor contactarse al TTY 7-1-1 o 800-659-2656.
Denver Economic Development & Opportunity
Denver Human Services

Housing
Neighborhood Development
Business Development
Welcome

Agenda:

• Review of our HUD-funded programs (5 min)
• Briefing of identified housing and community development needs and proposed projects (10-12 min)
• Review Regional Analysis of Impediments to Fair Housing Choice (10-12 min)
• Discussion – Q&As, comments, suggestions
Meeting Etiquette

To ensure that everyone in attendance has a chance to voice their opinion:

- Please limit your comments to 2 minutes on each subject. This will give everyone an equal chance to make comments.

- Please do not interrupt or debate others. There are no right or wrong opinions in our discussion today.

- If you have more to say or have very detailed questions, visit us after the hearing or send an email to Rachel.King@denvergov.org
HUD Planning Process
Community Development Block Grant

The following studies are required by all communities receiving Community Development Block Grant (CDBG) funds:

- **Consolidated Plan and Action Plan**—Con Plan is a 5-year plan that evaluates housing and community development needs and then guides how funds will be spent over the next five years. Action Plans are annual updates that specify how funds will be spent each year of the Con Plan cycle.

- **Fair Housing Study**—Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) are conducted once every 5 years and look at disparities in access to housing and economic opportunities for protected classes (race, color, religion, national origin, sex, disability, familial status).

Other HUD funds received by Denver are HOME funds, ESG, and HOPWA. Planned allocation of these funding sources are included in the Con Plan.
Analysis of Impediments to Fair Housing Choice
Cities and counties receiving federal housing and community development funds are required by HUD to complete an AI, to evaluate barriers to housing choice. This requirement is linked to the Federal Fair Housing Act of 1968. The requirement is designed to aid local leaders and community stakeholders in developing housing goals that will ultimately increase fair housing choice, build opportunity for all residents, and strengthen communities.

**Participants:**
- City and County of Denver
- Denver Housing Authority
- City of Aurora
- Aurora Housing Authority
- City of Boulder
- Boulder Housing Partners
- Boulder County
- Boulder County Housing Authority
- City and County of Broomfield
- City of Longmont
- Longmont Housing Authority
Community Engagement

Denver Participants:

- **Resident focus groups:** Attended by 350 residents representing a wide variety of protected classes
- **Resident survey:** Completed by more than 2,000 Denver residents
- **Stakeholder focus groups:** Represented persons experiencing homelessness, persons with disabilities and frail elderly, K-12 education, job training and community/technical colleges
- **Project website:** Accessed by 2,000 residents
Summary of Regional Challenges

- **Severe shortage of housing, especially affordable rental housing for families.** Disproportionate impact on families, including Hispanic, African American, and certain national origins who have larger household sizes and live with extended families.

- **Displacement of residents due to redevelopment of multifamily units, sales of rental units owned by investors, and landlords stopping acceptance of Housing Choice Vouchers.** Surveys of residents indicate that displacement significantly disproportionately affects African American, Native American, Hispanic, large families and persons with disabilities.

- **“3x income requirements” for rental units have a discriminatory effect on persons with disabilities whose income is primarily Social Security and Disability Insurance (SSDI).** Disproportionate impact on persons with disabilities and those living on a fixed income.

- **Lack of accessible housing.** Disproportionate impact on persons with disabilities.

- **Housing discrimination.** About one in four African American residents, residents with disabilities, Native American residents and Hispanic residents felt they experienced housing discrimination.
Challenges mostly unique to Denver

- Lack of information about housing availability, renters’ rights, and landlord tenant mediation services.

- Denver residents with Section 8 vouchers far exceed residents in any other jurisdiction for displacement concerns. Seventy-one percent say they have Section 8 and are worried their landlord will stop accepting vouchers; this compares to 49 percent in the region overall; 46 percent in Aurora; and just 16 percent in the City of Boulder. This concern likely reflects the diminishing stock of affordable rentals, particularly those that fall within HUD’s fair market rent range, in Denver.

- Denver residents are also more likely to say they face barriers due to crumbling or old sidewalks; cannot access fresh or healthy food in their neighborhoods; and live in high crime neighborhoods.
**Draft Denver Fair Housing Plan**

**Primary theme of goals:** Create a more equitable housing environment for vulnerable residents, create accessible housing, combat displacement, improve resources for renters

<table>
<thead>
<tr>
<th>Goal #</th>
<th>FAIR HOUSING GOAL</th>
<th>PROTECTED CLASS AFFECTED AND DISPROPORTIONATE IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Conduct an analysis of existing accessible rental units and create a database for people with disabilities to more easily find affordable accessible rental units</td>
<td>Persons with disabilities who need accessible and affordable housing</td>
</tr>
<tr>
<td></td>
<td>Based on the findings, explore additional strategies (programs, policy initiatives) to better connect residents with disabilities to accessible and appropriate units (e.g., smartphone app showing accessible and vacant units paired with information about fair housing rights)</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Explore a rental registry to promote the safety and well-being of all renters, as well as implement more standard lease practices, including those that prohibit potentially discriminatory practices</td>
<td>Families, larger households, refugee families</td>
</tr>
<tr>
<td>3</td>
<td>Add more income-restricted affordable housing, with a focus on providing units for the special populations such as people with disabilities, families, and larger households</td>
<td>Families, larger households, refugee families, and people with disabilities</td>
</tr>
<tr>
<td>Goal #</td>
<td>FAIR HOUSING GOAL</td>
<td>PROTECTED CLASS AFFECTED AND DISPROPORTIONATE IMPACT</td>
</tr>
<tr>
<td>--------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------</td>
</tr>
<tr>
<td>4</td>
<td>Explore strategies (programs, policy initiatives) to promote preservation and rehabilitation of income-restricted and unsubsidized affordable housing, with a focus on resident groups most vulnerable to displacement</td>
<td>Families, larger households, refugee families</td>
</tr>
<tr>
<td>5</td>
<td>Provide comprehensive eviction assistance to residents at risk of eviction, including connecting residents to financial assistance, mediation options and legal resources if needed</td>
<td>African Americans, refugees, immigrants, LEP households</td>
</tr>
<tr>
<td>6</td>
<td>Explore preference policies for residents at risk of displacement including people experiencing homelessness</td>
<td>Families, larger households, refugee families</td>
</tr>
<tr>
<td>7</td>
<td>Implement land use strategies captured in <em>Housing an Inclusive Denver</em> and <em>Blueprint Denver</em>, through Neighborhood Planning Initiatives that promote mixed income neighborhoods via height incentive overlays, expansion of ADUs and attached products, and developer incentives for affordable housing</td>
<td>All residents</td>
</tr>
<tr>
<td>Goal #</td>
<td>FAIR HOUSING GOAL</td>
<td>PROTECTED CLASS AFFECTED AND DISPROPORTIONATE IMPACT</td>
</tr>
<tr>
<td>--------</td>
<td>----------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>8</td>
<td>Ensure effective implementation of Denver's new policy to prevent discrimination on the basis of source of income</td>
<td>Low income renters with alternative sources of income including Housing Choice Vouchers, SSDI, child support. Disproportionately likely to be persons with disabilities, single parents</td>
</tr>
<tr>
<td>9</td>
<td>Leverage partnership with Denver Housing Authority to strategically acquire geographically dispersed land and properties to serve residents experiencing homelessness and very low-income residents</td>
<td>Low income renters with alternative sources of income including Housing Choice Vouchers, SSDI, child support. Disproportionately likely to be persons with disabilities, single parents</td>
</tr>
<tr>
<td>10</td>
<td>Expand the City's investments in housing the most vulnerable residents through permanent supportive, bridge, and transitional housing units and programs</td>
<td>Extremely low income renters, residents with disabilities, residents in recovery, persons experiencing domestic violence</td>
</tr>
<tr>
<td>11</td>
<td>Explore innovative programs like Bridge housing to house people experiencing homelessness and address barriers to securing housing such as credit history and criminal backgrounds until a permanent unit is available</td>
<td>Extremely low income renters, residents with disabilities, residents in recovery, persons experiencing domestic violence</td>
</tr>
</tbody>
</table>
Consolidated Plan & Action Plan
Purpose of the Consolidated Plan

- To identify a jurisdiction’s housing and community development needs, priorities, goals and strategies; and
- To stipulate how federal funds will be allocated to housing and community development needs in the community.

Informed by:
- Data analysis
- Other planning efforts in the City
- Community engagement from the AI
- Stakeholder survey and interviews
- Community meetings
What does Denver receive from HUD?

<table>
<thead>
<tr>
<th>Programs</th>
<th>Estimated Annual Funding Allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Development Block Grant (CDBG)</td>
<td>$6,797,000</td>
</tr>
<tr>
<td>HOME Investment Partnerships Program (HOME)</td>
<td>$2,936,000</td>
</tr>
<tr>
<td>Emergency Solutions Grants Program (ESG)</td>
<td>$582,000</td>
</tr>
<tr>
<td>Housing Opportunities for Persons with AIDS (HOPWA)</td>
<td>$2,279,000</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>$12,594,000</strong></td>
</tr>
</tbody>
</table>
Top Needs Identified in Con Plan Research

- **Affordable Housing**—rental housing affordable to low/moderate income, housing for those transitioning out of homelessness, accessible housing for people with disabilities and ownership opportunities for low/moderate-income residents.

- **Housing and Services for Homeless**—supportive services (case management, mental health care, homeless prevention) for persons who are experiencing homelessness or are at-risk; and permanent supportive housing.

- **Equity/Affirmatively Further Fair Housing**—neighborhood equity, disproportionate impact of housing shortage and 3x income requirements, lack of affordable (and voucher accepting) units for families, displacement, lack of accessible housing, lack of info on housing availability, renter’s rights and landlord/tenant mediation, and housing discrimination.

- **Transportation and Mobility**—transportation services (particularly for low/moderate income), transit-oriented development, and accessibility for residents with mobility challenges.

- **Public Facility and Infrastructure Improvements**—sidewalks, street lights and drainage, parks/community centers, and energy efficiency improvements.
Top Needs Identified in Con Plan Research

- **Neighborhood Support Services**—education, employment and training programs, crime awareness, health services, childcare, and youth programming for low/moderate income persons.

- **Business and Workforce Support**—job creation, retention and training, employment and contracting opportunities to very low, and low income residents and/or eligible businesses, transportation and childcare.

- **Services for Special Populations**—projects/services targeted to households containing persons with a disability, elderly households, large families, female headed households with children, limited English proficient households, and those at risk of homelessness. Specific needs include supports for residents transitioning out of homelessness, supportive services for people with disabilities transitioning out of institutions, supports that help seniors age in place, and mental health resources.

- **Services for Low and Moderate Income Populations**—rental assistance, after school care, child care, public safety education, healthy food access, and mental health resources.
2019 HUD Action Plan
## HUD 2019 Proposed Action Plan Projects

<table>
<thead>
<tr>
<th>Program</th>
<th>Fund Source</th>
<th>Amount Estimated</th>
<th>Indicator</th>
<th>2019 Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Housing</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Community Housing Development Organization-CO</td>
<td>HOME</td>
<td>$75,000</td>
<td>NA</td>
<td>-</td>
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<tr>
<td>Community Housing Development Organization- SA</td>
<td>HOME</td>
<td>$500,000</td>
<td>Housing Units</td>
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<tr>
<td>Downpayment Assistance for Homeownership</td>
<td>CDBG</td>
<td>$350,000</td>
<td>Households</td>
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<tr>
<td>Housing Access and Modification</td>
<td>CDBG</td>
<td>$300,000</td>
<td>Housing Units</td>
<td>30</td>
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<td>Housing Support (housing counseling)</td>
<td>CDBG</td>
<td>$374,254</td>
<td>Individuals/</td>
<td>5,400</td>
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<tr>
<td>Housing Support (housing counseling)</td>
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<td></td>
<td>Households</td>
<td></td>
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<tr>
<td>Rental Housing Development and Preservation</td>
<td>HOME</td>
<td>$1,000,000</td>
<td>Housing Units</td>
<td>10</td>
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<tr>
<td>For-Sale Development and Preservation</td>
<td>HOME</td>
<td>$500,000</td>
<td>Housing Units</td>
<td>n/a</td>
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<tr>
<td>Emergency Rehabilitation</td>
<td>CDBG</td>
<td>$250,000</td>
<td>Housing Units</td>
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<tr>
<td>Single Family Rehabilitation</td>
<td>HOME</td>
<td>$850,000</td>
<td>Housing Units</td>
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<tr>
<td>Tenant Based Rental Assistance</td>
<td>HOME</td>
<td>$632,000</td>
<td>Households</td>
<td>54</td>
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### HUD 2019 Annual Action Plan Projects

<table>
<thead>
<tr>
<th>Program</th>
<th>Fund Source</th>
<th>Amount Estimated</th>
<th>Indicator</th>
<th>Goal</th>
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<tbody>
<tr>
<td><strong>Economic Development</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Revolving Loan Fund</td>
<td>CDBG</td>
<td>$1,000,000</td>
<td>Jobs</td>
<td>12</td>
</tr>
<tr>
<td>Neighborhood Business Revitalization</td>
<td>CDBG</td>
<td>$1,000,000</td>
<td>Jobs</td>
<td>4</td>
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<tr>
<td>Economic Development Initiative</td>
<td>CDBG</td>
<td>$500,000</td>
<td>Businesses</td>
<td>345</td>
</tr>
<tr>
<td><strong>Neighborhood Development</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Neighborhood Improvements</td>
<td>CDBG</td>
<td>$500,000</td>
<td>Pub Fac./People</td>
<td>5/5,000</td>
</tr>
<tr>
<td>Neighborhood Facilities and Improvements</td>
<td>CDBG</td>
<td>$2,000,000</td>
<td>Pub. Fac./People</td>
<td>2/15,000</td>
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<tr>
<td>Neighborhood Support</td>
<td>CDBG</td>
<td>$800,000</td>
<td>People/LMA</td>
<td>700</td>
</tr>
<tr>
<td><strong>HOPWA</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supportive Services</td>
<td>HOPWA</td>
<td>$711,925</td>
<td>People</td>
<td>1,300</td>
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<tr>
<td>Tenant Based Rental Assistance</td>
<td>HOPWA</td>
<td>$751,200</td>
<td>Households</td>
<td>100</td>
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<tr>
<td>Short Term Rent Mortgage Utility Assistance</td>
<td>HOPWA</td>
<td>$96,000</td>
<td>Households</td>
<td>80</td>
</tr>
<tr>
<td>Permanent Housing Placement</td>
<td>HOPWA</td>
<td>$100,000</td>
<td>Households</td>
<td>100</td>
</tr>
</tbody>
</table>
Emergency Solutions Grant

The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families/individuals from becoming homeless. For more information and resources about ESG, go to HUD’s OneCPD website at www.OneCPD.info.

<table>
<thead>
<tr>
<th>Program</th>
<th>Fund Source</th>
<th>Amount Estimated</th>
<th>Indicator</th>
<th>2018 Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration</td>
<td>HESG</td>
<td>$43,650</td>
<td>N/A</td>
<td>-</td>
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<tr>
<td>Prevention</td>
<td>HESG</td>
<td>$20,000</td>
<td>People</td>
<td>15</td>
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<tr>
<td>Rapid Re-Housing</td>
<td>HESG</td>
<td>$345,000</td>
<td>People</td>
<td>175</td>
</tr>
<tr>
<td>Shelter</td>
<td>HESG</td>
<td>$173,350</td>
<td>People</td>
<td>20,000</td>
</tr>
</tbody>
</table>
How to Continue to Participate?

Tell us what you think today!

Call the City: Rachel King at 720.913.1669
Send an e-mail to: Rachel.King@denvergov.org
Send a letter to: Rachel King
ATTN: Draft 2019 Con Plan/Action Plan/AI
City & County of Denver
201 W. Colfax Ave., Dept 204
Denver, CO 80202

The Draft 2019 Consolidated Plan, Action Plan, and Regional AI will be available for comment at: www.denvergov.org/economicdevelopment (see Reports and Studies) from May 31st through July 1st
Appendix E

Propel Denver
Propel Denver

Denver Economic Development & Opportunity

2019 Strategic Plan
Denver Economic Development & Opportunity works to ensure our residents, businesses, and neighborhoods benefit from a vibrant economy.

We believe everyone should have the opportunity to make a home, get a job, and build a future.
OUR Vision

Leading an inclusive and innovative economy for all Denver residents and neighborhoods

OUR Mission

Delivering today while strategically investing for tomorrow. We create, catalyze, connect and cultivate.

WE CREATE consistency and stability amidst ever-changing economic tides. Our workforce support programs, housing initiatives, and neighborhood stabilization efforts help create economic resiliency for Denver.

WE CATALYZE an innovation ecosystem for people, business, and the Denver community. We promote innovation, invest in opportunity areas, and support small business development to help catalyze responsible growth in Denver.

WE CONNECT our partners and customers with opportunities—now and in the future. Our efforts attract global interest, expand city partnerships, and improve small business competitiveness to help connect businesses and residents with opportunities, both global and local.

WE CULTIVATE and promote equity. By adding affordable housing, reducing involuntary displacement, and improving job access, we cultivate responsible, equitable growth that preserves the character and vitality of Denver’s neighborhoods.
Business, Workforce & Global Development
Develops local and global business opportunities while connecting residents to jobs

Division of Small Business Opportunity (DSBO)
Creates and expands opportunities for small, minority and women-owned businesses

Housing
Creates and preserves housing options that are accessible and affordable to all Denver residents

Neighborhoods
Builds opportunities for residents and businesses in Denver’s diverse neighborhoods
OUR PRIORITIES

Five Core Goals

1. **foster**
   economic inclusivity by investing in people, assets, and places with unrealized potential

2. **preserve**
   the vitality of Denver’s neighborhoods with equitable jobs, housing, and business opportunities

3. **grow**
   Denver’s competitive capacity from home to globe

4. **enhance**
   Denver’s future economic resiliency

5. **leverage**
   the power of collaboration and resources across our collective agency and city partners to magnify impacts
“PROPEL DENVER is our 2019 Strategic Plan for advancing the mayor’s mission to set Denver’s people and neighborhoods on an equitable path to prosperity. Through this work, our team will collaborate across city agencies, and with the community—residents, nonprofits, businesses, and others—to ensure we have an economy that works for everyone. Today and together, we must continue to create opportunities for everyone in Denver to make a home, get a job, and build a future.”

Eric Hiraga
Executive Director, Denver Economic Development & Opportunity
Appendix F

Housing an Inclusive Denver
HOUSING AN INCLUSIVE DENVER
SETTING HOUSING POLICY, STRATEGY & INVESTMENT PRIORITIES
(2018-2023)
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<td>24</td>
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<tr>
<td>1) Create affordable housing in vulnerable areas and in areas of opportunity</td>
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<tr>
<td>2) Preserve affordability and housing quality</td>
<td>24</td>
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<td>3) Promote equitable and accessible housing options</td>
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<td>4) Stabilize residents at risk of involuntary displacement</td>
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ACKNOWLEDGEMENTS

Denver’s Housing Advisory Committee

COMMITTEE CHAIR
Kevin Marchman, Former Board Chair, Stapleton Development Corporation

COMMITTEE VICE CHAIR
Heather Lafferty, Executive Director and CEO, Habitat for Humanity of Metro Denver

COMMITTEE SECRETARY
Brad Weinig, Colorado Development Director, Herman & Kittle Properties, Inc.

Erik Soliván, Executive Director of the Office of HOPE, City and County of Denver
Eric Hiraga, Executive Director, Office of Economic Development, City and County of Denver
Jill Jennings Golich, Deputy Director of Community Planning and Development, City and County of Denver
Brendan Hanlon, Chief Financial Officer, City and County of Denver
Chris Connor, Acting Executive Director, Denver’s Road Home, City and County of Denver
Ismael Guerrero, Executive Director, Denver Housing Authority
Tracy Huggins, Executive Director, Denver Urban Renewal Authority
Cris White, Executive Director, Colorado Housing and Finance Authority
Alison George, Executive Director, Colorado Division of Housing
John Parvensky, Executive Director, Colorado Coalition for the Homeless
Veronica Barela, Former President and CEO, NEWSED Community Development
Carl Patten, Director of Community Benefit, Centura Health
Randy Kilbourn, Member of Cross-Disability Coalition and Denver Metro Fair Housing Center
Bill Pruter, Chief Financial Officer, Nichols Partnership
Michael Warren, Denver Area Development Manager, Metropolitan Homes and Metropolitan Residential Advisors
Kenneth Ho, Development Manager, Lennar Multi-Family Communities
Chuck Perry, Managing Partner, Perry Rose LLC
Trinidad Rodríguez, Senior Vice President and Managing Director of Public Finance, D.A. Davidson & Co.
Councilwoman Robin Kniech, At-Large City Councilmember
Jenny Santos, Health Coverage Guide, Servicios de la Raza

Prepared in partnership with Enterprise Community Partners, Inc. with input from community members and stakeholders in the public, private and non-profit sectors
Denver is beloved for its amazing outdoors, abundant sunshine, bustling economy, and unique and vibrant neighborhoods. Each month, another estimated 1,000 people choose Denver as their new home placing increasing demand on our housing and neighborhoods.

There is nothing I love more as Mayor than enjoying Denver’s diverse neighborhoods with all of you. From the active downtown city center and the sounds of Five Points, to Westwood’s Cuatro Vientos Park and Little Saigon Business District, Wash Park’s Smith Lake, the art of Mariposa and the diversity of Montbello. Our neighborhoods have defined us for generations. Now, our greatest challenge as a city is how we invest in our neighborhoods without sacrificing the cultural and historic fabric that makes them unique.

_Housing an Inclusive Denver_ uses input from more than 1,500 residents, numerous housing experts, and nonprofit partners to set a five-year strategy for future housing policy and investments. Led by the Housing Advisory Committee, Office of Housing and Opportunities for People Everywhere (HOPE) and Office of Economic Development, the plan focuses in on the key values of embracing diversity, leveraging investments to support inclusive communities, encouraging opportunity, and serving residents across a range of incomes from those experiencing homelessness to people living on fixed-incomes and working families.

_Housing an Inclusive Denver_ celebrates the diversity of our neighborhoods and identifies ways to keep Denver the vibrant city many of us have grown up with and many others have chosen for their new hometown. This plan, and its accompanying annual action plans, are meant to be flexible, living documents that serve to guide us through future changes to Denver’s housing market.

I want to thank the members of our Housing Advisory Committee, all of the residents, organizations and businesses who contributed to the creation of this plan. Today, we are enjoying some of the greatest prosperity in our history, and together we will ensure that it does not come at the cost of losing our cultural identity. I hope you’ll continue to engage with our Housing Advisory Committee and me as we work over the next five years to ensure that housing is affordable for all who choose to call Denver home.

Sincerely,

Mayor Michael B. Hancock
FROM THE HOUSING ADVISORY COMMITTEE CHAIR

Denver Friends,

There are few things that impact a city as much as its housing stock. In Denver, we’ve emerged from the downturns in the economy to thrive, but we face an increasingly difficult challenge – housing affordability for all incomes. Throughout 2017, the Housing Advisory Committee has heard from communities across the city about their greatest challenges and biggest opportunities. We’ve engaged with national housing experts and looked at successful programs in other cities to develop Housing an Inclusive Denver, a five-year plan for housing policy, strategies and investments.

One of the important changes with Housing an Inclusive Denver is its focus on addressing the housing needs and opportunities of the city along a “housing continuum,” from people experiencing homelessness to those striving to achieve homeownership. The plan outlines an approach to building communities of opportunity across the city for all people and identifies the strategies the City and County of Denver will use to advance opportunity and mitigate involuntary displacement over the next five years. It creates the overarching direction for allocating the city’s Affordable Housing Fund and federal housing resources, as well as housing and affordability policies and programs. In this capacity, the plan considers the unique characteristics of Denver’s neighborhoods and works to align policy and investment strategies to ensure that housing options along the continuum match distinct neighborhood conditions and contexts throughout Denver.

In addition to the five-year plan, an Annual Action Plan schedule will outline the priorities to which the city will allocate local and federal funds for each fiscal year during the five-year plan period.

The Housing Advisory Committee is pleased to present Housing an Inclusive Denver to the community. We view this as a living document that our committee will work to implement over the next five years as our housing market changes, and as we implement and evaluate the tools in our housing toolbox. We are committed to staying engaged and learning alongside you, our community, about the challenges and opportunities in your neighborhood and how the city can partner to create innovative approaches to address our housing needs.

Sincerely,

Kevin Marchman
EXECUTIVE SUMMARY

Overview
Denver is at a pivotal point where despite extremely low unemployment (2.2%), high workforce participation (90%+), and tremendous economic growth, housing costs are growing at such a rapid pace that incomes cannot keep up. *Housing an Inclusive Denver* outlines strategies to create and preserve strong and opportunity-rich neighborhoods with diverse housing options that are accessible and affordable to all Denver residents. The plan is centered around four fundamental values and four core goals.

Fundamental Values
*Leverage and enhance housing investments* with resources from public, private and nonprofit partners to support inclusive communities in Denver, including a focus on sustainability of the City’s existing resources for affordable housing development, preservation and programs.

*Foster communities of opportunity* by aligning housing strategies and investments with unique neighborhood conditions that consider five opportunity outcomes: stable and affordable homes, jobs and economic mobility, comprehensive health services, access to quality education, and mobility and transit connections.
Support housing as a continuum that serves residents across a range of incomes, including residents experiencing homelessness, those earning low wages or living on fixed-incomes such as seniors or residents with a disability, and working families.

Embrace diversity throughout neighborhoods to ensure that Denver remains a welcoming community for all residents by focusing on policies, programs and investments that support inclusive, mixed-income communities.

Core Goals

Create affordable housing in vulnerable areas AND in areas of opportunity by focusing on production that considers specific neighborhood conditions, including areas vulnerable to displacement and neighborhoods that have strong amenities such as transit, jobs, high quality education and health care. Measurable outcomes from investment and policies under this core goal include new units created.

Preserve affordability and housing quality by investing to maintain affordability in non-subsidized units and preserving or continuing affordability of existing publicly subsidized affordable housing. Measurable outcomes from investment and policies under this core goal include existing units preserved and residents served through program investments or policy actions.

Promote equitable and accessible housing options by supporting programs and policies that help residents across the housing continuum access affordable housing. Measurable outcomes from investment and policies under this core goal include residents served through program investments or policy actions.

Stabilize residents at risk of involuntary displacement by supporting programs and policies that help a resident maintain their existing housing or stay in their community. Measurable outcomes from investment and policies under this core goal include residents served through program investments or policy efforts.
**Housing and Affordability Investments**

**Recommendation 1: Analyze existing housing resources for performance, structure, and sustainability.** The City and its partners will conduct a policy review of the existing dedicated housing fund by the end of 2021, including a consideration of the performance and structure of the existing revenue sources, an evaluation of the ongoing sustainability of the existing sources, and a recommendation regarding the extension of funding sources in the housing fund.

**Recommendation 2: Explore opportunities to expand existing resources for housing investments.** The City and its partners will conduct an in-depth analysis of the range of possible opportunities to maximize the City’s resources available for housing, including the costs and benefits of specific funding options, including bonds, and the legal and policy considerations for a variety of uses.

**Recommendation 3: Coordinate housing investments with the City’s other affordability resources.** Since fostering communities of opportunity requires other affordability investments that complement housing investments, the City and its partners should explore ways to better coordinate limited resources, ensuring that the City’s investments are leveraged to effectively serve Denver residents and promote economic mobility.

**Recommendation 4: Pursue regional collaboration with partners across the Denver Metro Area to promote inclusive communities.** Recognizing that housing and affordability challenges do not start and stop at Denver’s boundaries, the City and its partners should pursue regional partnerships including with Denver’s Regional Council of Governments to leverage funding and investments strategies to promote inclusive communities.

**Legislative and Regulatory Priorities**

**Recommendation 1: Strengthen the City’s Preservation Ordinance.** The City and its partners are taking steps to clarify language in the Preservation Ordinance through a rulemaking process, and should coordinate across partners in the Housing Preservation Network to conduct regular outreach to owners of existing income-restricted properties to preserve income-restricted rental properties long-term.
Recommendation 2: Expand and strengthen land-use regulations for affordable and mixed-income housing. Through Blueprint Denver and supplemental implementation actions such as zoning modifications, the City should support land-use regulations that incentivize affordable and mixed-use housing, including expanding the development of accessory dwelling units.

Recommendation 3: Develop more consistent standards for affordable housing in major redevelopment areas. The City and its partners should foster mixed-income and mixed-use communities by developing clear standards for the circumstances when an affordable housing plan will be created for a major redevelopment area and exploring the creative use of tax-increment financing.

Recommendation 4: Enhance protections and assistance for renters, including exploring a rental registry. The City and its partners should support the safety and well-being of all renters in Denver by exploring a rental registry that would require landlords to register their rental properties and participate in regular inspections for health and safety standards.

Recommendation 5: Stabilize households through tax relief programs. The City and its partners should promote broader participation among eligible households for existing property tax relief programs and explore additional forms of tax relief for low and moderate-income households struggling to keep up with rising property taxes.

Recommendation 6: Explore a framework and methodology for determining a preference in new housing for residents at risk of displacement. The City and its partners should leverage data collected through the Analysis of Impediments (AI) process to explore a framework and methodology for a preference policy aimed at stabilizing residents at risk of displacement.

Recommendation 7: Enhance the existing State Low Income Housing Tax Credit. The City and its partners should back an extension of the existing state tax credit program beyond its current sunset in 2019 and, in close partnership with the Colorado Housing and Finance Authority and Colorado Division of Housing, explore additional tools to enhance the state tax credit to facilitate creation and preservation of affordable housing in Colorado.
Strategic Use of Land to Support Affordable Housing

Strategic land acquisition is an essential element of Denver’s long-term housing pipeline, and is an important strategy that the City and its partners will pursue to foster mixed-income neighborhoods, preserve affordability in vulnerable neighborhoods, and introduce affordability to areas with strong economic opportunities.

Recommendation 1: Leverage publicly owned land for affordable housing development. While the City has an existing process when disposing of its land that considers affordable housing as a potential use, the City and its partners should take proactive steps to conduct a comprehensive analysis of the current inventory of public and quasi-publicly owned land and its suitability for affordable housing development.

Recommendation 2: Facilitate acquisition of land directly and through partners for housing development. The City and its partners also have programs and funding resources that can be used for the direct acquisition of properties, or in partnership with developers interested in building affordable or mixed-income housing.
Recommendation 3: Explore tools to promote long-term affordability of housing, including land trusts, throughout Denver communities. The City and its partners should explore land trusts as a tool to preserve affordability citywide and in vulnerable neighborhoods, evaluating factors such as the upfront cost to invest in unit acquisition, ongoing cost of program development and community stewardship.

Housing for Residents Experiencing Homelessness

With more than 3,336 residents experiencing homelessness on any given night in Denver, the City and its partners will pursue an integrated approach to providing supportive housing, health services and job training opportunities to support our most vulnerable residents.

Recommendation 1: Expand investments in housing options for residents experiencing homelessness and integrate providers across the housing continuum. The City and its partners should effectively target housing resources by fully implementing and expanding the regional Coordinated Entry Systems (CES), OneHome, and employing shelter diversion strategies to help residents identify alternative housing options, and connect to services and financial assistance to quickly return to permanent housing.

Recommendation 2: Build housing capacity through policy and funding alignment. The City and its partners should harness resources and integrate investments across the housing continuum to develop additional supportive housing and evaluate performance of local projects to resolve episodes of homelessness more quickly.

Recommendation 3: Prioritize supportive services “gap” funding for approved supportive housing projects. The City and its partners should build a supportive services funding program to create and preserve quality supportive housing, prioritizing funding for existing supportive housing projects and establishing a framework to review, rank and award critical service funding to supportive housing projects in the pipeline.
Affordable and Workforce Rental Housing

Skyrocketing housing costs and stagnant wages have put most rental units out of reach for low- and moderate-income households, with a shortage of approximately 26,000 housing units for the lowest earners. The City and its partners are focused on strategies that produce new affordable options and stabilize those at risk of displacement to prevent residents, especially those living on fixed-income such as seniors and people on disability, from becoming homeless.

Recommendation 1: Preserve existing income-restricted affordable rental housing in vulnerable neighborhoods and near transit. The City and its partners should pursue proactive strategies to support priority preservation projects through acquisition and rehabilitation financing, and by developing a bridge finance tool to strategically acquire affordable properties while long-term financing options are assembled.

Recommendation 2: Preserve affordability of unsubsidized large-scale affordable rental properties. The City and its partners should develop and maintain an inventory of unsubsidized large-scale affordable properties, educate existing owners about the creative financing tools that are available for preservation, and support development partners in directly acquiring unsubsidized properties utilizing tools such as bridge financing and 4% Low Income Housing Tax Credits (LIHTC).
Recommendation 3: Preserve affordability of unsubsidized small-scale affordable rental properties. The City and its partners should explore a package of financing tools to incentivize existing owners to preserve unsubsidized small-scale properties and explore financing tools to strategically acquire these properties.

Recommendation 4: Promote programs that help households stay in their existing rental housing through comprehensive eviction assistance. The City and its partners should continue to support direct financial assistance aimed at stabilizing residents experiencing a housing crisis to help prevent eviction, displacement, and homelessness.

Recommendation 5: Promote development of new affordable, mixed-income and mixed-use housing. The City and its partners should explore financing mechanisms to better support mixed-income development, including ways to enhance Colorado’s State LIHTC and partnerships with local employers.

Recommendation 6: Promote programs that help households access affordable rental housing. The City and its partners should implement and evaluate the success of the proposed LIVE Denver program to buy down affordability of existing vacant rental units and explore ways that tenant assistance can better serve residents experiencing homelessness.

The Avondale affordable project
Attainable Homeownership

Since support for affordable homeownership opportunities can help residents build wealth and transition out the rental market (leaving an existing rental unit available for another household along the housing continuum), the City and its partners will invest to build and preserve affordable for-sale housing units. And with nearly 35,000 homeowners paying too much for their existing homes, many of them in areas with rapidly rising property taxes, the City and its partners will work to stabilize residents at risk of displacement through tax relief and other programs.

Recommendation 1: Promote programs that help households maintain their existing homes. The City and its partners should target existing homeowner rehabilitation programs to residents in vulnerable neighborhoods, promote financial literacy education for prospective and existing homeowners, and promote the development of accessory dwelling units as a wealth-building tool for low and moderate-income homeowners.

Recommendation 2: Promote development of new affordable and mixed-income homeownership stock. The City and its partners should implement and evaluate the success of current efforts to incentivize creative financing mechanisms to develop mixed-income communities, including condos and other housing stock.

Recommendation 3: Preserve affordability of existing income-restricted homeownership stock. The City and its partners should explore partnerships with key nonprofit and foundation partners to preserve income-restricted homes built under the previous Inclusionary Housing Ordinance or major development agreements.

Recommendation 4: Preserve affordability of existing unsubsidized affordable for-sale housing. The City and its partners should explore tools to help preserve the City’s existing affordable housing stock, such as through land trusts or shared appreciation loans.

Recommendation 5: Promote programs that help households access for-sale housing. The City and its partners should continue to support programs that provide down payment and mortgage interest tax incentives for low and moderate-income residents and explore new tools such as escrow agreements or lease-to-own models.
Prioritization Along the Housing Continuum

Feedback received from members of the public, housing stakeholders and members of the Housing Advisory Committee during the development of Housing an Inclusive Denver focused on finding a balance of investment along the housing continuum.

While investment along the housing continuum can help ensure there are options for each population, feedback received from the public, housing stakeholders and members of the Housing Advisory Committee indicated a need to target housing resources toward the most vulnerable residents in Denver experiencing homelessness and those earning below 30% AMI. Based on feedback received as part of the Housing an Inclusive Denver planning process, the following targets will guide housing investments aligned with the values, goals and strategies included in this plan:

40 - 50% of housing resources will be invested to serve people earning below 30% of area median income (AMI) and those experiencing homelessness who are seeking to access or maintain rental housing, including:

• 20 - 25% of housing resources to serve residents experiencing homelessness

• 20 - 25% of housing resources to serve residents earning below 30% AMI

20 - 30% of housing resources will be invested to serve people earning 31% to 80% AMI who are seeking to access or maintain rental housing

20 - 30% of housing resources will be invested to serve residents seeking to become homeowners or remain in homes they already own.
A Focus on Serving Residents

*Housing an Inclusive Denver* signifies a shift from previous planning efforts that have focused primarily on citywide housing strategies with a preference for creation of new units. *Housing an Inclusive Denver* recognizes that neighborhoods across the City face different challenges, have varying conditions, and offer different opportunities to residents.

If federal and local resources remain consistent with current levels, the City and its partners aim to leverage the proposed strategies within *Housing an Inclusive Denver* to create or preserve approximately 3,000 housing units by 2023.

**GOAL: Create affordable housing in vulnerable areas AND in areas of opportunity** by focusing on production that considers specific neighborhood conditions, including areas vulnerable to displacement and neighborhoods that have strong amenities such as transit, jobs, high quality education and health care.

**TARGET OUTCOMES:** If local and federal resources remain consistent with current levels, the City and its partners will aim to create at least 2,000 new affordable units by 2023. Of these new units, approximately 90% are expected to serve renters and 10% are expected to serve homeowners.

**GOAL: Preserve affordability and housing quality** by investing to maintain affordability in non-subsidized units and preserving or continuing affordability of existing publicly subsidized affordable housing.

**TARGET OUTCOMES:** If local and federal resources remain consistent with current levels, the City and its partners will aim to preserve at least 1,000 existing affordable units by 2023. Of these new units, approximately 90% are expected to serve renters and 10% are expected to serve homeowners.

The City and its partners will measure effectiveness of housing investments not just by the sheer number of units created or preserved, but by the number of residents who are served through housing investments. If federal and local resources remain consistent with current levels, the City and its partners aim to leverage the proposed strategies within this plan to serve at least 30,000 households by 2023 with programs aimed at stabilizing residents at risk of displacement or those seeking to obtain housing.
GOAL: Promote equitable and accessible housing options by supporting programs and policies that help residents across the housing continuum access affordable housing.

TARGET OUTCOMES: If local and federal resources remain consistent with current levels, the City and its partners will aim to serve at least 20,000 households by 2023 with program resources such as homebuyer counseling, downpayment assistance, and supportive services.

GOAL: Stabilize residents at risk of involuntary displacement by supporting programs and policies that help a resident maintain their existing housing or stay in their community.

TARGET OUTCOMES: If local and federal resources remain consistent with current levels, the City and its partners will aim to serve at least 10,000 households by 2023 through program investments such as tenant–landlord counseling, eviction assistance, and emergency home repair programs.
Section 1

INTRODUCTION
SECTION 1 INTRODUCTION

Denver prides itself on being an open, inclusive, and welcoming place to live—or in the words of Mayor Michael B. Hancock, “a world-class city where everyone matters.”

Denver’s great art, music, and food scenes, along with its distinctive neighborhoods and natural beauty, continue to appeal to those who have lived here for generations, and draws newcomers and adventure-seekers from around the world. Between 2010 and 2017, more than 100,000 people moved to Denver and the City’s economy and housing market gained remarkable strength.

This prosperity drives a new challenge: how to keep neighborhoods affordable in the face of higher housing costs. Rising rents have outpaced gains in household incomes; increasing home values threaten to drive out low- and moderate-income households; and on average, more than 3,000 residents are unable to afford a home at all. Rising housing costs affect all Denver residents, but are particularly tough for low- to moderate-income renters, residents experiencing homelessness, seniors, and persons with disabilities.

For many households, the threat of displacement due to housing pressures is real, creating daunting stress and instability in their daily lives. Research demonstrates that households with stable housing in strong neighborhoods have a lower risk of negative
health outcomes, including disease and poor mental health. The City and its partners want to ensure residents can stay in their homes and neighborhoods, and that residents who do not currently live in a stable, affordable living situation can access new rental and homeownership opportunities. Most of all, though, the City and its partners are focused on ensuring public investments support stronger connections between housing, good-paying jobs, and healthy living, so all Denver residents can have a good life.

Denver leaders are building on several years of successful efforts to address the City’s housing challenges. In 2016, City Council approved Denver’s first-ever dedicated housing fund of $150 million to support affordable housing creation, preservation and programs over a ten-year period. Since 2015, the City and its partners worked together to house more than 1,500 residents experiencing homelessness in permanent supportive and more stable, long-term housing, and together, will open two more permanent supportive housing developments and two new emergency shelters by the end of 2018. The Mayor’s 3x5 Challenge produced 3,000 housing units in just four years—one year ahead of schedule – and the City helped 1,300 residents become first-time homeowners through its Metro Mortgage Assistance Plus Program. Additionally, the Mayor created the new Office of Housing and Opportunities for People Everywhere (HOPE) to work across City departments to better coordinate and leverage investments in housing, health services and workforce training.

Despite low unemployment and high workforce participation, housing costs are growing so quickly that incomes can’t keep up.
Denver is at a pivotal point where despite extremely low unemployment (2.2%), high workforce participation (90%+), and tremendous economic growth, housing costs are growing at such a rapid pace that incomes cannot keep up. *Housing an Inclusive Denver* outlines strategies to create and preserve strong and opportunity-rich neighborhoods with housing that is accessible and affordable to all Denver residents. This plan explains how the City and its partners will use housing as a platform to advance opportunity and mitigate displacement over the next five years. *Housing an Inclusive Denver* will guide housing policy decisions and resource allocations to create, preserve, and promote affordable housing over the next five years.

**Fundamental Values**

*Housing an Inclusive Denver* is organized, first and foremost, around several fundamental values. These values include 1) a focus on leveraging and enhancing housing investments to promote the ongoing development and preservation of inclusive communities in Denver, 2) building communities of opportunity that help all residents reach their full potential, 3) supporting housing as a continuum where the needs and conditions along one part of the
continuum influence the success of other areas, and 4) a need to stabilize residents at risk of involuntary displacement due to economic pressures.

The following values guide overarching housing policy and investments to foster an inclusive Denver:

1) **Leverage and enhance housing investments.**
Denver’s housing challenges are complex and will continue to shift as economic conditions and demographics change over time. Even with recent steps to expand Denver’s housing options, addressing our evolving housing needs will require creative tools, collaboration across public, private and nonprofit partners, and expanded resources. The City and its partners will work together to make impactful investments to ensure that residents can stay in their homes and neighborhoods, and that residents who do not currently live in stable, affordable living situations can access new rental and homeownership opportunities.
2) Foster communities of opportunity.
Within Denver, achieving communities of opportunity means that Denver residents have the tools and resources needed to reach their highest potential. They can lead healthy lives, feel secure in their homes, and live close to quality jobs, schools, transportation options and services. To understand specific neighborhood conditions across Denver, Housing an Inclusive Denver takes an approach to measuring opportunity at the Census Tract-level, modeled off the Opportunity360 platform developed by Enterprise Community Partners, Inc. Through this analysis, the City and its partners can begin to understand neighborhoods in the context of five opportunity outcomes: stable and affordable homes; opportunities for economic mobility; connections to comprehensive health services for overall wellness; access to a quality education; and easy access to mobility and transit connections. This high-level analysis informs the unique characteristics and opportunities of Denver’s neighborhoods and allows the City to align housing strategies and investments to specific areas throughout the city. Denver’s neighborhoods are grouped based on these shared conditions and market characteristics.

3) Support housing as a continuum.
In its most recent five-year housing strategy, Housing Denver, the City defines its housing continuum as a range from “critical needs” to “workforce rental” to “workforce ownership.” This plan updates this continuum to focus on residents and their unique housing and service needs, from those experiencing homelessness, to those seeking affordable and workforce rental housing, and attainable homeownership. Recognizing households with a range of income levels exist within each of these populations, no static income levels are associated with each group. Instead, specific income levels will be aligned with specific neighborhood conditions and proposed strategies in annual action plans aimed at implementing this plan. By creating income targets based on strategies, the City and its partners can make more informed decisions related to resource allocation and adjust targets based on the performance of specific strategies or as needs along the continuum evolve (rather than based on pre-defined groupings).

4) Embrace diversity throughout neighborhoods.
Denver thrives when our neighborhoods remain welcoming communities for all residents. The City and its partners will focus on prioritizing investments into programs that support diverse, mixed-income communities that provide opportunity for all residents to
succeed. With this focus, the City and its partners will consider how investments in development, preservation and programs support residents and neighborhood development, not just on units produced or preserved.

Core Goals

*Housing an Inclusive Denver* establishes **four core goals** to guide the City’s affordable housing strategies over the next five years:

1) **Create affordable housing in vulnerable areas AND in areas of opportunity.**

By emphasizing a focus on residents rather than just the production of housing units, the City and its partners will prioritize specific neighborhood conditions, including areas vulnerable to displacement and neighborhoods that provide access to opportunity, when creating new affordable housing. The strategies under this goal include investing in land acquisition for future housing development and promoting development of mixed-income communities.

2) **Preserve affordability and housing quality.**

Preservation is a core component of *Housing an Inclusive Denver*. Denver will focus on preserving existing affordable housing, both homeownership and rental, in vulnerable neighborhoods and areas of higher opportunity. The strategies under this goal include investing to maintain affordability in non-subsidized housing and preserving or continuing affordability of existing publicly subsidized affordable housing.

3) **Promote equitable and accessible housing options.**

This plan seeks to align cross-cutting citywide actions and policies to support equitable and accessible housing options for Denver residents along the housing continuum. Actions or policy decisions under this goal will enable housing strategies more broadly through community engagement, formal legislative or regulatory action, new and creative finance mechanisms, or programs that help residents access existing housing.

4) **Stabilize residents at risk of involuntary displacement.**

This plan seeks to build upon previous City efforts to identify neighborhoods throughout Denver that are “vulnerable to gentrification” by targeting resources to serve residents, both homeowners and renters, who are at risk of displacement. Policies or investments under this goal are aimed at helping to stabilize residents and support diverse, inclusive communities.
Denver’s Approach to Neighborhoods

Housing an Inclusive Denver recognizes that neighborhoods across the city face different challenges, have varying conditions, and offer different opportunities to their residents. Neighborhoods throughout Denver exhibit a range of market-driven and demographic conditions that make residents vulnerable to displacement and provide various levels of affordability for homeowners and renters. Public and private investment in vulnerable neighborhoods has contributed to rising housing costs, and longstanding Denver residents in many neighborhoods are finding it difficult to remain in their homes.

This plan builds upon previous work that the City has conducted to understand what makes a neighborhood vulnerable to involuntary displacement. In 2016, Denver’s Office of Economic Development (OED) released Gentrification Study: Mitigating Involuntary Displacement, an analysis that aimed to identify the factors that cause residential displacement, determine neighborhoods where displacement is occurring or could happen, and inform how the City and its partners invest resources into housing and economic development to promote equitable and inclusive neighborhoods. While the term “gentrification” encompasses a complex group of
neighborhood dynamics, involuntary displacement is a clearly negative impact of gentrification that the City and its partners can take action to mitigate. Gentrification is defined in the 2016 study as:

“[The process that] occurs when a neighborhood has attractive qualities— for example, location or historic architecture— but remains relatively low value. The disconnect between potential value and current value (called “the rent gap”) may occur due to historic disinvestment by public and private sectors. When the area becomes desirable to higher-income households and/or investors, there are changes in the housing market. As demand rises for the neighborhood, higher-income households are able to outbid low-income residents for housing, and new development and economic activity begins to cater to higher-income tastes. Lower-income households and/or households of color migrate out of the neighborhood and new in-migrants change the demographics of the neighborhood.”

Since the release of the Gentrification Study, the City and its partners have taken multiple steps to implement its recommendations, including creating a permanent source of funding for affordable housing activates, strategically acquiring land in vulnerable neighborhoods, and integrating the study’s neighborhood typology to evaluate housing investments. *Housing an Inclusive Denver* builds upon the Gentrification Study to identify and implement specific strategies aimed at stabilizing residents at risk of involuntary displacement.

With the unique characteristics of neighborhoods in mind, *Housing an Inclusive Denver* integrates the Gentrification Study’s analysis to also understand how neighborhoods across the city promote access to opportunity. As part of this plan, the City and its partners developed five neighborhood types informed by Enterprise’s Opportunity360 platform to align placed-based strategies and assets related to housing, health, economic mobility, transportation, and education throughout Denver. These neighborhood types help ensure that housing production and preservation strategies address the unique opportunities within specific neighborhoods, including vulnerable neighborhoods, and address the core issue of displacement and lack of affordable housing options. In other words, these neighborhood types account for place and enable the City to categorize specific strategies in relation to both the housing continuum and opportunity outcomes in neighborhoods throughout Denver.
Community Engagement

As part of the community engagement process to develop *Housing an Inclusive Denver*, the City and its partners conducted a public survey, public meetings, and a host of individual meetings with key stakeholder groups across Denver. First and foremost, the survey and public meeting participants affirmed the widespread need for affordable and workforce housing throughout the City of Denver. Input received from more than 200 attendees at the public meetings and more than 1,000 public survey responses suggested the City prioritize investments in a variety of different neighborhoods and foster a mix of housing types to achieve diverse communities.

Key themes for investment of housing resources:

1) **Balance investments along the housing spectrum.** Members of the public identified the need to invest in housing along the income spectrum, including permanent housing for the homeless, low-income rental housing for those on disability, social security, or very low wages, workforce rental housing for workers who earn slightly more but are still struggling with housing costs, and home-ownership for moderate-income families. Respondents to the public survey prioritized low-income rental housing (29%) and permanent housing for the homeless (23%) among these options.

**FIVE DOMINANT THEMES - FEEDBACK**

1. **Secure** additional resources for affordable housing
2. **Address** land trusts as a tool to promote long-term affordability and preserve existing housing
3. **Address** gentrification and displacement issues
4. **Focus** on serving individuals at the lowest income, especially those experiencing homelessness, seniors, and people with disabilities
5. **Focus** on serving residents experiencing or who are at risk of an eviction
Public meeting participants prioritized workforce rental housing (27%) and low-income rental housing (24%) among these options.

2) Balance investments in housing development and preservation. Members of the public identified the need to balance housing investments in development of new affordable housing and preservation of existing affordable housing. Respondents to the public survey prioritized the investment of more or slightly more resources to preserve affordability of existing affordable housing over development of new affordable housing by a narrow margin. Specifically, 52% of respondents identified “more resources” or “slightly more resources” to preserve affordability of existing housing compared to 48% that identified “more resources” and “slightly more resources” to build new affordable housing.

3) Balance investments throughout Denver neighborhoods. Members of the public identified the need to balance housing investments in vulnerable neighborhoods and those that currently have limited affordable options. In the public survey, respondents prioritized the investment of more or slightly more resources to expand affordable housing in neighborhoods with limited options for low- and moderate-income households by a narrow margin. Specifically, 50% of respondents identified “more resources” and “slightly more resources” to neighborhoods with limited options compared to 49%
that identified “more resources” and “slightly more resources” to housing in vulnerable neighborhoods.

About one-third of Denver residents said their current housing situation was “not affordable.” Among these residents, more than half said that increased rent was the main reason for lack of affordability, followed by one-third of respondents who said changes in their income have affected their ability to afford their current housing situation. [Figures 1.1-1.2]

The open-ended responses further underscored how changing housing costs have affected residents living in already unaffordable housing situations. Some respondents credited outside help or reliance on family for their ability to keep up with changes in housing costs and unexpected circumstances, like long-term illness. Others noted limited options in Denver when living on fixed incomes, such as Social Security. The survey results also suggested support for inclusion, more resources to both preserve affordability of existing affordable housing and build new affordable housing, and housing investments that serve vulnerable residents. The survey results also helped the City and its partners better understand what factors are important to Denver residents when making choices about their housing situation.

**Importance of inclusion.** The survey asked a series of questions about the importance of living in areas with diverse neighbors—those of different races and ethnicities, economic statuses, or ages and lifestyles. Consistently, a majority of respondents recognized the importance of living in these types of neighborhoods. Specifically, 64% of respondents said it was “very important” or “important” to live in a diverse neighborhood with residents at a variety of ages and lifestyles. Additionally, 58% of respondents said it was “very important” or “important” to live in an economically diverse neighborhood. [Figures 1.3-1.5]

**Support for more resources for housing-related work.** Nearly the same share of respondents ranked “more resources to preserve affordability of existing housing” and “more resources to build new affordable housing” as their top priorities, suggesting that both activities should receive additional resources. Thirty-nine percent of respondents ranked “more resources to expand affordable housing in neighborhoods with limited options for low- and moderate-income households” as their top priority, followed by 35% of respon-
Support for serving vulnerable residents. A majority of respondents were concerned that Denver lacks enough affordable housing for seniors and persons with disabilities (61%); residents experiencing homelessness (56%), and families with young children (54%). More than one-third of respondents ranked “low-income rental housing for those on disability, social security, or very low wages” as their top priority when asked how the City should prioritize housing investments across income levels. And 67% of respondents ranked this option as either their first or second priority. [Figures 1.8-1.9]

Importance of cost and location in housing decisions. Overwhelmingly, housing cost was the most important factor when Denver residents choose a home, with 84% of respondents including it as an important factor. After housing cost, proximity to employment, perceived neighborhood safety, and features of the housing itself were important to at least one-half of all respondents. [Figure 1.10]
Section 2

Current Housing & Demographic Conditions
Cost-burdens affect 36% of Denver residents.

SECTION 2. CURRENT HOUSING AND DEMOGRAPHIC CONDITIONS

As noted in the community engagement section, Denver’s strong housing market is becoming increasingly costly for residents. The market currently commands higher home values and rents as compared to 2000 levels and lacks rental units that are affordable and available to low-income households. Cost-burdens are widespread, affecting 36% of Denver residents, and renters at a rate more than twice as high as owners. Across all income levels, these higher costs are disproportionately affecting extremely and very low-income households.

As part of developing Housing an Inclusive Denver, the City completed a data-driven analysis of citywide housing needs, market conditions, and the homeless delivery system, using both national and local data sources. This analysis was refined with input from stakeholders and Denver residents collected through focus groups, public meetings, and an online survey. Key findings related to residents experiencing homelessness; affordable and workforce rental housing, and attainable homeownership are summarized in this section.
Residents Experiencing Homelessness

Homeless population. In January 2017, 3,336 households reported experiencing homelessness on a given night in Denver.\(^1\) However, the point-in-time picture of people living without homes is a single snapshot in time and fails to capture households moving in and out of homelessness throughout the year. In addition to the one-night count, the waitlist for the Coordinated Entry System, OneHome, which provides a regional common assessment tool for targeting housing to those experiencing homelessness, is more than 4,000 individual households and the eligibility list for the Denver Social Impact Bond Project targeting homeless frequent users of the jail system includes more than 2,000 individuals.

Broad spectrum of homeless population. Most households counted through the Point-in-Time Count Report (PIT) are households without children (2,514) and the remaining share are households with children (261). Other household composition characteristics include:

1. Newly Homeless: 471 respondent households
2. Chronically Homeless: 701 respondent households
3. Veterans: 457 respondent households
4. Unaccompanied youth: 267 respondent households

The working homeless population. Sixty-one percent of respondent households in the 2017 PIT survey reported that they or a member of their family had received income from working in the past month.

Housing the Homeless. Below is a summary of the findings from a review of the City’s partnerships with providers to serve residents that are experiencing homelessness.

- Data suggests individuals are cycling in and out of homelessness, leaving one intervention for another, sometimes simply moving from one shelter to the next.

- A significant portion of the population is entering the homelessness assistance system from staying with family and friends, indicating an opportunity to implement diversion strategies.

- Through investment in Permanent Supportive Housing (PSH), Denver is successfully targeting resources to those with the greatest need who are coming from literal homelessness situ-
atations, such as living on the street or in a place not meant for human habitation.

• There is some movement among households experiencing homelessness from PSH into shorter term housing solutions (e.g. Rapid Re-housing) which suggests a potential need for improved targeting.

• There is a need to evaluate PSH policies/criteria for next step strategies for people exiting PSH and those who no longer need the intensive support of PSH.

• A significant portion of households reviewed who were exiting temporary (transitional) housing were doing so to another temporary housing program, which suggest the need for more permanent, non-time-limited solutions.

Affordable and Workforce Rental Housing

Cost-burdened households are most prevalent among renters. Nearly 68,000 renter households across all income ranges were paying too much for housing (compared with 35,000 owner households) in 2015 (see Figure 2.1). In other words, these renters are “cost-burdened,” paying more than 30% of their income toward monthly housing costs. The number and share of renters experiencing cost burdens increased by 5% between 2010 and 2015. The most vulnerable renters—those who are housing insecure—make up about 14.7% of Denver’s total population.

Higher rents. The citywide average rent is $1,376. Rents in neighborhoods like Downtown and City Park/North Central Denver are even as much as 20% higher (see Table 2.1). Similarly, smaller units, such as efficiencies and one-bedroom units, command rents 13–15% higher than Fair Market Rent (FMR). Asking rents above FMR suggest that households using rental assistance like Section 8 vouchers may already be having trouble accessing smaller units. Rents within Denver have increased within the last five years: Between 2011 and 2016 the average rent increased by 46% (from $941 to $1,376), increasing 16% between 2014 and 2016 alone (see Figure 2.2).
Shortage of affordable and available rental units for low-income households. While Denver’s housing market recently absorbed more than 16,000 newly constructed rental units, Denver has a shortage of affordable and available rental units for all low-income households, especially extremely low-income households. A need exists for at least an additional 15,500 units for extremely low-income renters to create enough units for households at that income level (see Figure 2.3). Ideally, these units would come with income restrictions so households at those income levels do not have to compete with higher income households for these units. Today, more than 10,500 affordable rental units are not available to low-income households because they are occupied by a higher-income household.

Older, more affordable units in demand. Residents face competition for older, more affordable rental units. Compared with the newer rental units (those built after 2010), older units (those built before 1979) had a much lower vacancy rate than new units, as well as the citywide vacancy rate for rental housing. Further analysis related to Denver’s unsubsidized, large-scale inventory reinforces the importance of older multifamily buildings in the City’s affordable housing supply. More than 130 properties offer average rents

Figure 2.1 | Number of Cost-Burdened Households (2015), Denver, CO

Source: 2015 American Community Survey Public Use Microdata Sample
in line with Fair Market Rents for studios ($844), one bedrooms ($1,031), and two bedrooms ($1,305). Most of these properties have characteristics that suggest they may need renovations, including being classified as “Class C” properties and built at least three decades ago (if not more).

**Attainable Homeownership**

**Owners paying too much for housing.** About 35,000 owner households were paying too much for housing in 2015, although the number and share of owners experiencing cost burdens decreased by 7% between 2010 and 2015. While fewer owner households currently experience cost-burdens, the share of low-income households increased within Denver, outpacing growth in their renter counterparts. Similarly, characteristics of the City’s cost-burdened owners suggest they may need assistance to maintain their current housing situations. And some stakeholders echoed concerns for existing homeowners during the public engagement process. For instance, one-third of cost-burdened owner households are seniors, who may need accessibility features (now or in the future), and 31% are extremely or very low-income households, who may need to make repairs or upgrades to their homes.

**Increasing property values.** Another issue affecting homeowners are higher tax bills, resulting from higher assessed property values. Changes in assessed property values between 2011 and 2017 un-
derscore how affordability could change for owners, especially if recent trends continue. While stagnant as recently as 2011, assessed property values have increased by about 30% over the past two assessment cycles.11 Some of the highest concentrations of higher assessed values during the 2017 assessment cycle are in adjacent neighborhoods in western Denver like Villa Park, Ruby Hill, and Mar Lee. Note that these neighborhoods were identified in the Office of Economic Development’s *Gentrification Study: Mitigating Involuntary Displacement* as “vulnerable to gentrification.”

**Higher home sales price.** Residents interested in becoming homeowners within Denver are finding themselves priced out of the city, especially in strong for-sale markets. The median home price is $378,000 for a detached single-family home and $300,940 for an attached single-family home. The median home price increased significantly between 2012 and 2016. The median price of detached homes increased 43%, while the median price of attached homes increased 96% (see Table 2.2 and Figure 2.4).

**Limited for-sale inventory.** The overall supply of for-sale inventory is limited for residents interested in purchasing a home. The Metro Denver Board of Realtors estimates that the City only had a one-month supply of detached homes and a two-month supply of attached homes on the market during 2016.12 As a point of comparison, the City had a five-month supply of attached homes during 2012. Both detached and attached homes are selling quickly, only staying on the market an average of 30 to 51 days, respectively.
Section 3

HOUSING & AFFORDABILITY INVESTMENTS
SECTION 3.
HOUSING AND AFFORDABILITY INVESTMENTS

More than 100,000 new residents have moved to Denver since 2010, and construction of new housing units has surged, with more than 5,000 permits approved for residential units each year over the same period. While Denver, like other major cities, has experienced an increase in “scrape-offs” where a typically older, smaller and more affordable home is replaced with a larger and more expensive home, most of the units constructed over the last several years have increased the City’s overall inventory of housing. But the pace of residential development has not kept up with population increases, exacerbating rising housing costs due to limited supply.

Over the last several years, the City has taken steps to foster and increase its overall supply of housing in anticipation of new population growth. The original Blueprint Denver plan aimed to channel development into “areas of change” and set the stage for the City’s transition from a use-based zoning code where land uses were divided across the city by districts (for example, zone districts that focus on residential, commercial and industrial uses rather than allowing a mix of uses) to a form-based zoning code that integrates neighborhood context and a mix of uses throughout neighborhoods. Denver’s transition to a form-based zoning code allowed increased density in appropriate areas of the city, especially near transit and...
the city’s downtown core. The City and its partners recognize that addressing affordability in Denver will take a multitude of different policy strategies over time, including those aimed at increasing the overall supply of housing in the city to keep pace with population. Section 4 of this plan outlines several paths the City and its partners should explore as part of the Denveright planning process and update to Blueprint Denver to continue to increase the overall supply of housing.

While increasing the overall supply of housing can help address the affordability of the City’s new and existing housing stock, increased inventory alone is unlikely to produce housing affordable to the lowest income and most vulnerable residents. This plan aims to find a balance in addressing affordability along the housing continuum, recognizing that inclusive communities offer choice in housing for residents at a variety of income levels.

Federal funds have declined over the last decade, and future allocations are volatile given historic trends and other threats. Local resources and other forms of public and private assistance are more important than ever, requiring the City and its partners to invest current resources effectively and efficiently, explore opportunities to leverage existing resources, and increase resources as appropriate.

Recommendation 1: Analyze existing housing resources for performance, structure and sustainability.

The City and its partners have taken important steps in the last several years to increase housing investments, but implementing the strategies outlined in this plan will take creative solutions and bold steps to promote inclusive communities in Denver. As part of the implementation of Article V, Chapter 27 of the Denver Revised Municipal Code (D.R.M.C.) that created the dedicated housing fund, the City must conduct an analysis and review of the ordinance prior to December 31, 2021. The policy review of Article V shall include a public hearing and a report on the findings of the review and any recommendations to the Housing Advisory Committee and City Council. The City’s analysis of the ordinance should consider performance and structure of the existing revenue sources, an evaluation of the ongoing sustainability of the existing sources, and a recommendation regarding the extension of funding sources in the housing fund.
Recommendation 2: Explore opportunities to expand existing resources for housing investments.

In addition to a policy review of the existing dedicated housing fund, the City and its partners should explore other opportunities to expand housing resources. Exploration of additional housing resources should include specific partnerships with public, private and nonprofit entities as outlined in this plan, such as through the development of a preservation fund, enhancing the State Low Income Housing Tax Credit (LIHTC), or partnerships with foundations and employers. Additionally, the exploration of additional housing resources should include a full analysis and development of the range of possible opportunities to maximize the City’s resources available for housing, including bonds or new fees.

City agencies, including the Department of Finance and City Attorney’s Office, are conducting in-depth analysis of the costs and benefits of specific funding options, including bonds, and the legal and policy directed uses of bond proceeds. The analysis will include the current pay-as-you-go funding resource compared to issuing bonds utilizing varying mill rates and issuance schedules. Furthermore, the analysis around issuing bonds will consider the potential impact to the City’s credit ratings and attendant taxpayer burden to support the bonds, as well as the considerable amount of other unfunded capital needs that may require bonds in the future. The analysis should be complete and presented to the Housing Advisory Committee within the second quarter of 2018.

Recommendation 3: Coordinate housing investments with the City’s other affordability resources.

The City’s housing resources are complemented by investments into other components of affordability, including health, jobs, and transit access. The City and its partners should continue to identify opportunities to leverage and expand the resources available for housing and affordability investments. Ensuring that Denver remains affordable for all residents will require a strong nexus between each component of opportunity, including the nexus between housing, job creation and outreach, and growth in wages to promote economic mobility.

Likewise, investments in affordable housing should leverage other major City investments, for example, into major public infrastructure such as transit. The location of affordable housing is critical to promote opportunity, and one of the most important considerations
when targeting affordable housing investments is proximity to transit. The strategies outlined in *Housing an Inclusive Denver* should be implemented in close partnership with complementary planning processes such as the Mobility Action Plan.

The City and its partners should explore ways to better coordinate existing housing and affordability investments, ensuring that limited resources are invested as effectively as possible to serve Denver’s low and moderate-income households in need. The City and its partners should also develop more coordinated data collection and outcome metrics for City investments across housing and affordability programs.

Find more detailed information about housing and affordability investments in Section 10: Key Supplemental Information.

**Recommendation 4: Pursue regional collaboration with partners across the Denver Metro Area to promote inclusive communities.**

Since housing and affordability challenges do not start and stop at Denver’s boundaries, the City and its partners should pursue regional partnerships to create inclusive communities. The City and its partners have taken critical steps toward regional collaboration through the expansion of the Transit Oriented Development Fund, convening an Annual Housing Summit, and the City is currently working across jurisdictions and housing authorities in Aurora and Boulder County to complete a Regional Analysis of Impediment. Additional work must be done by the City and its partners to pursue regional partnerships alongside key agencies such as the Denver Regional Council of Governments, including and should explore opportunities to leverage and expand housing investments to the extent possible.
Section 4

Legislative & Regulatory Strategies
The City and its partners will explore legislative and regulatory actions to strengthen tools and support affordable and mixed-income housing development.

SECTION 4.
LEGISLATIVE AND REGULATORY STRATEGIES

Denver has several legislative and regulatory tools to facilitate and promote affordable housing development—but more are needed to adequately address the growing affordable housing needs and varying neighborhood conditions described in this plan.

Over the next five years, the City and its partners will explore and implement legislative and regulatory actions that strengthen existing tools such as the City’s Preservation Ordinance, better-align land use regulations to support affordable and mixed-income housing development, protect tenants of rental housing, and support inclusive communities through cultural diversity.

Recommendation 1: Strengthen the City’s Preservation Ordinance.

Denver’s existing Preservation Ordinance is intended to preserve existing affordable housing (those restricted through a covenant, contract or other affordability restriction on the property) through two primary tools: “right-of-first-refusal” and its affordability period. Currently, the Preservation Ordinance requires that any affordable rental housing development receiving City subsidies be subject to a minimum of twenty-year affordability contract. To support long-term preservation of Denver’s existing affordable rental housing stock,
the City and its partners should explore a longer minimum affordability period. Peer cities such as Seattle require rental housing receiving City resources to have a minimum affordability period of 50 years, where Boston requires perpetual affordability. Minimum affordability periods in Denver’s Preservation Ordinance should be supported by term sheets that also promote long-term affordability.

Under the “right-of-first-refusal,” owners of locally and federally subsidized housing must notify the City if they plan to sell their building or convert their units to market-rate housing. When an owner decides to sell his or her property, the City or a selected designee has a right-of-first-refusal, enabling the City to facilitate the acquisition of the property at terms that are consistent with a market offer.

The City and its partners are already working to clarify language within its Preservation Ordinance – a tool that helps protect affordability after more proactive approaches have been exhausted – through the development of rules and regulations. The City and its partners should clarify through the rulemaking process the specific timelines and requirements for executing the right-of-first-refusal, when and where preservation should be prioritized under the right-of-first-refusal (including factors such as the property’s proximity to transit or neighborhoods where residents are vulnerable to displacement), and specific steps the City or its designee can take to
use notification periods outlined in the Preservation Ordinance as proactively as possible to evaluate a preservation opportunity.

While the Preservation Ordinance provides the City or its designee a right-of-first refusal to preserve existing affordable housing, there are challenges with exercising this right to purchase a property. The right-of-first-refusal works well when a willing buyer has quick access to capital, but can be challenging with affordable housing when multiple layers of financing are required to acquire and rehabilitate the property. In recent years, Denver’s costly housing market has made it cost-prohibitive for the City to exercise its right-of-first refusal, particularly given the timeline for matching a market offer that is mandated in the Preservation Ordinance. Investment strategies aimed at preserving existing income-restricted rental affordable housing stock are outlined in Section 7, as well as strategies aimed at coordinating across partners such as CHFA’s Housing Preservation Network to preserve existing affordable rental housing.

As existing efforts to strengthen the Preservation Ordinance are implemented, the City and its partners should consider other ways to enhance this preservation tool: 1) extending notice requirements as a means to assemble alternative financing or allocate additional funding for expiring properties; 2) explore using a “right-of-first-offer” in addition to the “right-of-first-refusal” to enable the City or its designees to make the first offer on a property prior to sale – creating a more streamlined (and ideally less costly) sale process; 3) work with potential purchasers to extend affordability commitments; and 4) enhance support for tenants at the termination of income-restrictions, including provisions for relocation assistance if the property converts to market-rate housing.

Key Actions:

• Clarify, as part of the rulemaking process for the Preservation Ordinance, the process for executing the right-of-first-refusal, when and where preservation should occur (including factors such as the property’s proximity to transit or in neighborhoods where residents are vulnerable to displacement), and steps to use the Ordinance’s notification period as proactively as possible.

• Coordinate across partners in CHFA’s Housing Preservation Network to conduct regular outreach to owners of existing-income
restricted properties to understand and identify preservation opportunities, recognizing the unique needs of property owners, including rehabilitation, acquisition or other financing.

- Develop strong relationships with preservation partners and creative financing solutions to preserve properties under the Preservation Ordinance, including exploring bridge capital available for acquisition while long-term finance tools are layered together.

- Explore other ways to enhance provisions within the Preservation Ordinance related to notice requirements, right-of-first-offer options, and support for tenants in income-restricted properties.

- Explore extending the minimum affordability period for projects receiving City subsidies to promote long-term preservation.

**Recommendation 2: Expand and strengthen land use regulations for affordable and mixed-income housing.**

The City is currently undergoing a community vision process called Denveright. This effort focuses on creating a vision of what Denver will look like in 2040. A key vision element of the Denveright planning process is to create “equitable, affordable and inclusive communities” throughout Denver. While Denveright has a broader planning scope that includes long-range strategies across a variety of areas such as land use, transit, trails and open space, this plan serves as a tool to implement key components of the *Equitable, Affordable and Inclusive* vision element by promoting affordable housing options and access to opportunity.

During the public engagement process for this plan, stakeholders shared their ideas about ways that the City could strengthen land-use regulations to both support affordable housing projects and more broadly increase diversity of housing types throughout Denver. These ideas focused around three key areas that could be supported in *Blueprint Denver*, the City’s long-range land-use and transportation plan and part of Denveright: 1) streamlining and facilitating the development of accessory dwelling units as a tool for affordability and to stabilize residents at risk of displacement; 2) promoting a diversity of residential development types throughout Denver neighborhoods, including density as a tool to increase housing supply and introduce affordability; and 3) creating a package of development incentives that support affordable housing projects and promote the development of more mixed-income projects citywide.
Currently, about 25% of Denver, excluding Denver International Airport, is zoned to support development of an “accessory dwelling unit,” a secondary unit that can be attached or detached from the primary residence. However, some of the lots in these areas are not large enough to qualify for an accessory dwelling unit—or ADU. This building form can provide more affordable rental housing options throughout predominantly single-family neighborhoods, and can act as a wealth building tool to help low and moderate-income residents remain in vulnerable neighborhoods. Expanding the number and type of neighborhoods that allow ADUs should be explored as part of the Blueprint Denver update.

To support development of ADUs in existing and future areas of the city, the City and its partners are looking to peer cities that have streamlined ADU development through expedited review of pre-approved design templates, finance packages to support homeowners with the cost of constructing ADUs, and a training curriculum that provides information about becoming a landlord and finding tenants for the ADU. Recommendations about the programmatic steps that Denver and its partners are taking to encourage development of ADUs as an anti-displacement strategy are outlined in Section 8.

Similarly, other forms of multi-unit residential housing development can increase overall housing supply and provide more affordable housing options for low and moderate-income households in Denver. Examples might include duplexes, fourplexes, rowhomes or cohousing options where individual units are grouped together in a single building with shared amenities such as kitchen or community space. The City should encourage the development of these “missing middle” development types throughout Denver neighborhoods to provide residents with a diversity of housing choices (including

“Missing middle” housing includes a variety of development types such as duplexes, rowhomes, townhomes, and fourplexes, all of which can provide a greater range of housing options in Denver neighborhoods. This type of housing typically serves people who are living well above the poverty line, but still struggle to afford housing in Denver, such as teachers and firefighters.
price, size, and tenure of housing options) through specific zoning and land use recommendations in *Blueprint Denver*.

Likewise, the City has already taken steps to pilot a permitting process for development of “tiny homes,” typically homes that are more affordable due to their size at 400 square feet or less. The City and its partners should implement and evaluate the success of the tiny home pilot program and explore opportunities to expand this tool throughout Denver.

With the City’s past population growth (and anticipating more in the next few years), the update to *Blueprint Denver* and subsequent implementation measures such as zoning should also direct more dense development to appropriate areas throughout Denver neighborhoods, especially focusing on current or planned transit corridors. The City and its partners are already taking steps to pilot an incentive overlay for building heights aimed at providing added density near transit in exchange for affordable housing at the 38th and Blake Station Area. The City and its partners should implement and evaluate the success of the incentive overlay and explore expanding the program to other areas where increased density may be appropriate, such as near transit. Likewise, language in the update to *Blueprint Denver* should explicitly reference how housing affordability will be addressed in areas of the city where increased density is considered to promote equitable and inclusive communities.

While Denver’s zoning code does have some specific incentives for affordable housing such as an “alternative minimum vehicle parking ratio” which allows for a parking reduction when a project serves persons earning below 40% AMI, these incentives are limited and lack clear guidelines to support affordable housing and encourage developers to include affordable units within a mixed-income development. For example, the zoning code does not specify if a minimum number of 40% AMI units are needed to qualify for the parking reduction incentive or the affordability period for these units.

With the adoption of the City’s housing linkage fee, residential and commercial developers have the option to build affordable, income-restricted units as an alternative to paying this fee (sometimes called the “build alternative”). However, without other regulatory tools to encourage development of affordable units, residential and commercial developers may find paying the linkage fee easier...
Implementing the zoning and land use recommendations in Blueprint Denver can encourage a mix of residential development types throughout Denver neighborhoods.

and more cost-effective. The City should encourage more mixed-income development in Denver by creating a package of incentives that provide value for a developer. This package may include more clearly defined parking reductions, lower building permit fees, or special staff support to navigate the complex multi-agency permitting process, in exchange for a certain percentage of affordable units built on site.

Key Actions:

• Encourage development of a mix of residential development types throughout Denver neighborhoods that provide residents with a diversity of housing choices (including price, size, and tenure of housing options) through specific zoning and land use recommendations in Blueprint Denver.

• Evaluate success of the current “tiny home” pilot and explore opportunities to expand the implementation of innovative housing solutions such as tiny homes throughout other areas of Denver.

• Implement and evaluate success of a proposed incentive overlay for building heights at the 38th and Blake transit station and explore expanding the program to other areas where increased density may be appropriate, such as near transit.
• Create a package of incentives that provide value for a developer, such as more clearly defined parking reductions, lower building permit fees, or special staff support to navigate the complex multi-agency permitting process, in exchange for a certain percentage of affordable units built onsite.

Recommendation 3: Develop more consistent guidelines for affordable housing in major redevelopment areas.

In recent years, City leaders have also worked to foster mixed-income communities through the provision of affordable housing at major infill development sites. Some examples of these communities include the redevelopment of the former St. Anthony’s Hospital in the West Colfax neighborhood and former University of Colorado Health Sciences Center in the Hale neighborhood. However, despite affordable and mixed-income housing being anticipated in these areas, the City’s zoning code and land use regulations do not provide clear guidance for developers about when to submit affordable housing plans during the site planning process.

Since Denver has a limited supply of undeveloped land that can be used to support affordable and mixed-income development, the City should develop clear standards for the circumstances when an affordable housing plan should be created for a major redevelopment site and provide clear guidance on the process to develop and execute the plan. Circumstances could include sites that utilize a General Development Plan, Infrastructure Master Plan, or similar tool; sites that utilize tax increment financing; or infill sites that are above a certain acreage or that include a specific number of residential housing units. A plan for how affordable housing will be addressed in a major redevelopment area should be closely coordinated across City and partner agencies, including the Office of Economic Development, Community Planning and Development, Department of Finance, and the Denver Urban Renewal Authority.

In addition to developing more clear guidelines for when and how affordable housing should be integrated into major redevelopment areas, the City and its partners should explore creative uses of tax-increment financing to promote inclusive communities throughout Denver. Since the use of tax-increment financing is coordinated closely with the Denver Urban Renewal Authority and Denver Public Schools — and is subject to numerous state regulations — careful
analysis of creative uses of tax increment financing should be conducted in partnership with these agencies.

Key Actions:

• Develop clear standards for the circumstances when an affordable housing plan (such as sites with a General Development Plan, Infrastructure Master Plan, or similar tool) should be created for a major redevelopment site and provide clear guidance on the process to develop and execute the plan.

• Explore creative uses of tax-increment financing that can support low and moderate-income residents, including how TIF can be used to support the City’s anti-displacement strategies, in close partnership with the Denver Urban Renewal Authority and Denver Public Schools.

Recommendation 4: Enhance protections and assistance for renters, including exploring a rental registry.

Today, about one-half of Denver residents rent their homes. Unfortunately, low- and moderate-income renters occupy a precarious position within the City of Denver: rents have dramatically outpaced incomes over the past two decades and many are at risk of being displaced from their homes, especially in vulnerable neighborhoods. Denver has limited affordable options available within the city if low- and moderate-income renters are displaced, and limited legal protections to ensure renters can remain in their communities and live in safe, decent conditions. Anecdotally, renters are afraid to report problems with their homes and many tenants live without a lease, creating uncertainty and limited legal recourse in the event of a rent increase.

The City of Denver already protects all its residents through building, fire, and public health code enforcement activities. In 2016, the Department of Public Health and Environment (DDPHE), which responds to residential health and housing complaints under the City’s public health code, responded to more than 1,100 complaints. These health and safety concerns ranged from mold to pest infestations to heating and plumbing issues. Like many cities, Denver’s code enforcement activities are largely complaint-based, meaning a resident would need to both identify and report a code violation to the City. Under a complaint-driven system, residents without general protections offered by a lease may not want to
report problems with their homes—including those problems that threaten their health and safety. To assist these residents, the City can undertake more proactive enforcement of health, safety and building codes.

The City, including agencies such as the Department of Public Health and Environment and the Department of Community Planning and Development, will explore development of a rental registry to promote the safety and well-being of all renters, which could require landlords to register their rental properties and participate in regular inspections for health and safety issues, among other provisions. Landlords generally must pay a small registration fee to help cover the administrative costs of the registry program, including inspections.

In addition to ensuring all residents live in a safe home, a rental registry could provide a means for the City to expand basic protections for tenants. These expanded tenant protections could include more standard lease practices as well as education and outreach about tenants’ rights. As part the exploration of a rental registry, the City and its partners should consider ways to protect residents from discrimination based on the source of their income, for example, from Social Security, rental assistance like Housing Choice Vouchers, or child support.

Neighboring cities like Boulder and Westminster use a rental registry and require landlords to create a written lease for any rental exceeding 30 days and to provide a copy of that lease to tenants. In addition, Boulder provides educational materials on a variety of topics, like the process to request home repairs and landlord-tenant roles and responsibilities (through its Landlord-Tenant Handbook). As part of the process to explore a rental registry program in Denver, the City should conduct an analysis of the citywide staffing capacity required to oversee the program during initial development of a rental registry and throughout ongoing inspections.

A key component of supporting renters that might be at risk of displacement includes protecting residents during a housing crisis. The City has already taken steps to support renters experiencing or at risk of eviction by providing the following assistance: 1) temporary rental and utility assistance for renters experiencing a crisis, such as a notice of rent increase or sudden loss of income, aimed at preventing eviction; 2) a comprehensive landlord and tenant

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National Case Studies:
Seattle, WA adopted a rental registration and inspection ordinance (RRIO) that created an online database of all registered rental properties that the public could use to check for basic health and safety standards before signing a lease. Under Seattle’s RRIO, landlords must renew their registered properties every five years and all registered properties are inspected at least once every 10 years.

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rights guidebook aimed at educating property owners, managers and residents experiencing or at risk of an eviction about their rights under Colorado law; and 3) distribution of eviction assistance and resource information to residents facing an eviction through outreach workers in eviction court. Find more information about these investment strategies in Section 7 of this plan.

Key Actions:

- Explore a rental registry to promote the safety and well-being of all renters, that could require landlords to register their rental properties and participate in regular inspections for health and safety issues.

- Explore ways to implement more standard lease practices between landlords and tenants.

- Explore ways to protect residents from discrimination based on the source of their income, for example, from Social Security, rental assistance such as Housing Choice Vouchers, or alimony as part of the exploration of a rental registry.

- Conduct an analysis of the citywide staffing capacity required to develop and administer a rental registry, including during the initial registration process and ongoing inspections, certifications, and proactive steps to maintain a high quality of housing stock.

Recommendation 5: Stabilize households through tax relief programs.

Compared with other cities, Denver’s residential property taxes are relatively low; the City’s Department of Finance estimates they make up approximately 40% of a property owner’s total tax bill. However, many households within Denver are struggling to keep pace with their property tax bills. The average assessed value increased 30% citywide between the 2015 and 2017 assessment cycles, and in many neighborhoods, these increases were much higher (as much as 70%). At the same time, many vulnerable populations, such as seniors and persons with disabilities, are already cost-burdened; data suggests that seniors (aged 65 years or older) comprise about one-third of homeowners that are both low-income and paying more than 50% of their monthly income on housing costs.
The City of Denver already offers some forms of tax relief for seniors and disabled veterans through a number of programs:

1. **Property Tax Exemption for Seniors and Disabled Veterans.** This exemption enables seniors (aged 65 years or older), their surviving spouses, and disabled veterans who have lived in their home as their primary residence for at least 10 years to exempt taxes on a share of a home (50% on the first $200,000). The State of Colorado reimburses the Denver Assessor’s Office for the property taxes exempted through this program.

2. **Property Tax Deferral Program for Seniors and Active Military Personnel.** This program defers the property taxes for qualified seniors (aged 65 years or older) and active duty military personnel. The state of Colorado pays the Denver Assessor’s Office for the property taxes deferred through this program; a lien is placed on the participant’s property that does not have to be paid unless the participant no longer qualifies for the deferral.

3. **Property Tax/Rent/Heat Credit (PTC) Rebate.** In place since 1971, this rebate pays back part of household expenses for property taxes, utilities, and rent for low-income seniors, a surviving spouse of a senior, or a resident with a disability (regardless of age). The total rebate is based on a household’s income and expenses.

The City can explore forms of tax relief for low and moderate-income households struggling to keep up with rising property taxes.
4. Elderly and Disabled Refund Payment. This program provides a partial refund of property taxes, or the equivalent in rent, paid by qualified Denver residents who are 65 years or older and are income limited or disabled. The refund does not have to be paid back and there is not lien attached to the property. In 2017, the income of qualifying participants could not exceed $15,900 for a single person or $23,100 for couples.

The City should take proactive steps to promote broader participation among eligible households in existing property tax relief programs by actively marketing to eligible households through partnerships with community-based organizations, social service agencies, such as the Department of Veterans Affairs, and in neighborhoods where assessed values have increased more than the citywide average.

However, as tax bills continue to rise, the City will also explore additional local forms of tax relief for low- and moderate-income residents struggling to keep up with rising property taxes. The City may consider expanding the existing tax relief program for seniors to a broader group of residents living on a limited income or explore other forms of tax relief for low- and moderate-income households that would allow property taxes to be deferred through a lien on the participant’s property that does not have to be paid until the time of a sale or unless the participant no longer qualifies for the deferral. Like the program available for seniors and persons with disabilities, additional forms of tax relief for a broader group of low- and moderate-income residents could be available to both homeowners and renters.

Escalating costs associated with higher property taxes are often passed along to tenants of rental properties, further exacerbating expensive rents. Tax rebates could take a few different forms to property owners, such as a direct, ongoing rebate or competitive grant program to property owners in exchange for offering or maintaining a portion of their rental units as affordable units. Nonprofit entities (with federal 501(c)3 status), including nonprofit developers, are already eligible for a property tax exemption under a recent change to City policy. The City will explore property tax relief programs to support property owners who may not qualify for the existing exemption but may still need help with their property taxes in exchange for keeping a percentage of units affordable to low-income households on-site. This type of tool may be particularly
effective to help property owners of small-scale multifamily properties (e.g., those with buildings with 4–20 units), who may not have access to more conventional financing to help offset their operating costs.

Exploration of broader property tax relief programs should be conducted in close partnership with the Department of Finance to understand potential impacts to the City budget and the influence that such programs could have on other programs that use property taxes as a source of revenue, including the City’s dedicated housing fund.

Key Actions:

- Promote broader participation among eligible households in existing property tax relief programs through partnerships with community-based organizations and social service agencies, focusing on neighborhoods where assessed values have increased more than the citywide average.

- Explore additional forms of tax relief for low- and moderate-income residents struggling to keep up with rising property values, such as expanding the existing senior and disabled property tax relief program.

- Explore property tax relief programs that support property owners of multi-unit buildings who may not qualify for the existing nonprofit exemption to foster mixed-income developments.

Recommendation 6: Explore a framework and methodology for determining a preference in new housing for residents at risk of displacement.

As part of the Analysis of Impediments (AI) planning process, the City, the Denver Housing Authority, and other jurisdictions throughout the region will develop goals and priorities that address contributing factors to racial and ethnic segregation and other fair housing issues and support racial equity. As part of this process, the City and its partners will look at existing concentrations of poverty and racial and ethnic minority groups to develop strategies aimed at promoting more inclusive and equitable communities.

As part of the development of Housing an Inclusive Denver, the City examined existing data from the U.S. Department of Housing and Urban Development on the location of “racially and ethically con-
centrated areas of poverty” or R/ECAPs throughout Denver. These areas are identified at a Census-tract level. This plan examined the relationship of R/ECAPs as part of its broader analysis of neighborhood conditions; based on this analysis, most R/ECAPs are in Type 1 neighborhoods. This plan aims to promote inclusive communities throughout Denver by preserving affordability in vulnerable neighborhoods and promoting development of new affordable housing in high opportunity areas. The AI planning process will build upon the work of this plan to promote communities of opportunity and deconcentrate poverty, while supporting cultural diversity and inclusion.

With dramatically increasing housing costs that threaten to displace low- and moderate-income households, especially communities of color, the strategies outlined in this plan are integral for Denver to remain a diverse and thriving city. Peer cities such as Portland and San Francisco have developed policy tools that provide a preference for residents that have been displaced or are at risk of displacement. These policies aim to help households impacted by voluntary or involuntary displacement stay in the city or return if they have already been displaced. The City and its partners may explore a policy in Denver that provides preference in new affordable housing for residents that have been or are at risk of displacement. As part of the exploration of this policy approach, the City and its partners should ensure that any proposed framework and methodology to develop and apply a preference for new projects does not have unintended negative impacts on “protected classes” under the Fair Housing Act. Protected classes under the Fair Housing Act include race, color, religion, national origin, sex, disability, and familial status.

The City and its partners should also take steps to integrate community participation of ongoing stewardship efforts for affordable housing when exploring models such as a land trust that could help preserve affordability in vulnerable neighborhoods. More information about land trust models can be found in Section 5.

Key Actions:

- Leverage data collected from the AI to understand existing demographic characteristics of Denver neighborhoods over time, including concentrations of racial and ethnic minorities, to promote policies that embrace cultural diversity and promote access to opportunity.

National Case Studies:
Portland, OR developed a preference policy to help households stay in or return to neighborhoods in North and Northeast Portland where urban renewal activity has occurred over several decades. Under the policy, residents are given preference in new affordable housing if they are at risk of displacement and additional points if the residents’ ancestors had previously been displaced from the same neighborhoods.
Explore framework and methodologies used to develop and implement preference policies in peer cities, evaluating whether and how a preference policy based on economic displacement could be implemented in Denver.

**Recommendation 7: Enhance the existing State Low Income Housing Tax Credit.**

In 2014, Colorado’s General Assembly adopted legislation to develop a State Low Income Housing Tax Credit that was intended to enhance existing federal tax credits administered by the Colorado Housing and Finance Authority (CHFA). The initial purpose of the tax credits was to support development of rental housing units as part of state recovery efforts from the 2013 floods, and also to jump start the 4% federal LIHTC program across the state. The tax credits, which provide funding in the form of private sector investment equity to for-profit and nonprofit developers of affordable rental housing, have supported the creation or preservation of 1,124 affordable units in Denver.

While the state tax credits have been extended by the Colorado Legislature until 2019, the program is set to sunset at the end of that calendar year. The City and its partners should support an extension of the existing state tax credit program beyond 2019 to support the development and preservation of affordable rental housing. In addition to supporting an extension of the existing state housing tax credit, the City and its partners should explore additional tools to expand and enhance the state tax credit program to support projects in local jurisdictions that can provide reimbursement of the expansion to the state. An analysis of potential tools to enhance the state tax credit should be conducted in close partnership with Denver’s Department of Finance, the Colorado Housing and Finance Authority, and the Colorado Division of Housing.

**Key Actions:**

- Support an extension of the existing state tax credit program beyond the current sunset in 2019 to facilitate development and preservation of affordable rental housing in Colorado.

- Explore additional tools to expand and enhance the State Low Income Housing Tax Credit to support rental housing projects in Denver, and other local jurisdictions, in close partnership with the Colorado Housing and Finance Authority and the Colorado Division of Housing.
Section 5

Strategic Use of Land to Support Affordable Housing
SECTION 5.
STRATEGIC USE OF LAND TO SUPPORT AFFORDABLE HOUSING

During the development of this plan, one issue was consistently identified by stakeholders across each segment of the housing continuum: the rising cost and limited availability of land for affordable and mixed-income development. Strategic use of publicly owned property and acquisition of land for future development are essential elements of Denver’s long-term housing pipeline and an important tool to foster mixed-income neighborhoods, preserve affordability in vulnerable neighborhoods, and introduce affordability to areas with strong economic opportunities.

Addressing the challenge of accessing land for future housing development will require an approach focused on the following strategies: 1) leverage publicly owned land for affordable and mixed-income housing, 2) facilitate land acquisition through direct investment of City resources alongside existing tools such as the Regional Transit-Oriented Development (TOD) Fund, and 3) exploring the use of new tools that can promote the creation and preservation of affordable housing, including land trusts as a tool to provide long-term affordability throughout Denver communities.
Recommendation 1: Leverage publicly owned land for affordable housing development.

The City took an important step forward with Mayor Hancock’s 2016 update to the Executive Order on City-Owned Land and Leased Real-Estate (Executive Order 100). The executive order serves as the primary policy tool to inform the use of City-owned property, including how the City acquires additional properties and disposes of the property that it already owns. In terms of affordable housing, Mayor Hancock’s order directs the Division of Real Estate (within the Finance Department) to coordinate with Community Planning Development and Office of Economic Development staff to evaluate the appropriateness of affordable housing when disposing of City-owned property. The site-level analysis for these opportunities should include considerations like proximity to transit and other neighborhood indicators.14

While Executive Order 100 provides a path for identifying and prioritizing affordable housing when disposing of property, the City and its partners should take proactive steps to conduct a comprehensive analysis of the City’s current inventory of land and its suitability for affordable housing development. An initial dataset of vacant and underutilized parcels was developed based on information available through the Assessor’s Office (also within the Finance Department) as part of the development of this plan. Additional steps are needed to refine the data and determine suitability for housing, including comparing the existing dataset to other data sources across City agencies and removing undevelopable parcels of land that are too narrow or include setback limitations. The updated

Denver’s Division of Real Estate coordinates with Community Planning Development and Office of Economic Development staff to evaluate affordable housing options when disposing of city-owned property.
dataset should be evaluated based on individual parcels’ proximity to transit and other neighborhood indicators, as outlined in this plan, to identify priority opportunities for future housing development.

Recognizing that housing is an important component of Denver’s economic vitality, workforce recruitment, and transit-oriented development, the City and its partners should also take proactive steps to develop partnerships with other public or quasi-public landholders to prioritize affordable and mixed-income housing on existing vacant or underutilized parcels currently owned by these entities. Public partners such as the Regional Transportation District (RTD), the Denver Housing Authority (DHA), and Denver Public Schools (DPS) own parcels of that could be developed to include affordable housing, including in locations that align with the priorities outlined in this plan, for example near transit or job centers.

The City and its partners should explore formal partnerships with public and quasi-public agencies to prioritize and set specific standards for use of public land for affordable housing. With the identification of key parcels that could be prioritized for affordable housing development, the City should work across public and quasi-public partners to develop a specific vision for the site, target income levels, populations, and tenure served by the development, as well as supportive services or programming as needed. The analysis of suitability of specific sites for affordable housing should also consider the potential environmental and health impacts of the site, and explore appropriate regulations to ensure that human health is protected.

As part of the implementation of Executive Order 100 and partnerships with public and quasi-public partners, the City should take steps to develop a clear and consistent process for soliciting development proposals to execute the specific vision for housing or mixed-income development on publicly owned parcels. An analysis of the suitability and specific development vision for public or quasi-public owned sites should be combined with strategies and tools outlined in this plan to promote long-term affordability and support low- and moderate-income households.
Key Actions:

- Explore formal partnerships with public and quasi-public agencies to prioritize and set specific standards for use of publicly owned land for affordable housing.

- Evaluate the suitability of City-owned land and land owned by public or quasi-public partners for affordable housing development per factors such as its proximity to transit and other neighborhood indicators as outlined in this plan.

- Develop specific visioning and procurement processes to identify development partners to build affordable and mixed-income housing on public and quasi-publicly owned land.

Recommendation 2: Facilitate acquisition of land directly and through partners for housing development.

The City and its partners also have programs and funding resources that can be used for the direct acquisition of properties, or in partnership with developers interested in building affordable or mixed-income housing. City resources should be used to enhance existing tools such as the Regional Transit Oriented Development (TOD) Fund—which was updated in 2015 in partnership with Enterprise Community Partners’ local Denver office to acquire land near transit throughout the Metro Region—and other Community Development Financial Institutions such as the Mile High Community Loan Fund. Even with current tools, land prices in Denver continue to rise, and the City and its partners will explore ways to strengthen and enhance existing resources available for land acquisition.

The City has also taken steps over the last several years to be more proactive in acquiring land directly for affordable and mixed-income housing development. These direct acquisitions have been in proximity to current and future transit corridors, and have been aimed at preserving affordability in vulnerable neighborhoods. With a consideration for leveraging limited resources where possible with other existing land acquisition tools, the City should continue to directly acquire land in vulnerable neighborhoods to preserve opportunities to develop affordable and mixed-income housing, but should also focus on acquiring land in proximity to high performing...
schools and job centers to promote greater access to opportunity throughout Denver.

**Key Actions:**

- Leverage existing City resources with current tools, such as the Regional TOD Fund and Community Development Financial Institutions, to fund land acquisition for future affordable and mixed-income housing development.

- Directly acquire land in vulnerable neighborhoods to preserve opportunities to develop affordable and mixed-income housing in proximity to high-performing schools and job centers to promote greater access to opportunity throughout Denver.

**Recommendation 3: Explore tools to promote long-term affordability of housing, including land trusts, throughout Denver communities.**

As part of a broader cross-cutting strategy to promote long-term affordability for housing investments, the City and its partners should consider mechanisms such as a citywide land trust model, to ensure housing remains affordable for low and moderate-income households for decades to come. Land trusts are typically used to ensure long-term affordability by enabling eligible households or partners to own the property on a site and lease the land underneath it from a management entity. By taking the cost of the land out of the real estate transaction, homes in a land trust can also be more affordable than those on the market.

The City will explore how land trusts can also be used as a tool to preserve affordability in Denver and especially in our vulnerable neighborhoods. To explore the use of land trusts in Denver, the City and its partners will convene a set of stakeholders that includes experts in the development and management of land trusts, neighborhood representatives, for-profit and non-profit developers, and foundation partners. The City and its partners’ analysis of land trusts will include:

- Evaluating financial feasibility and sustainability of models for the upfront and ongoing cost, effective and efficient program administration, and strategic property acquisitions to develop the program across the city
Robust community participation in the development of the land trust program

Ways to utilize a land trust model to address the unique needs of vulnerable neighborhoods across the city, including factors such as the balance of rental and for-sale housing, the balance of new construction and preservation of housing, and the level of affordability needed to address neighborhood conditions.

Some peer cities have also used a land lease model to ensure long-term affordability where the City maintains control of publicly owned or directly acquired land, and leases the land to an owner of the rental or for-sale property on it.

The City and its partners should explore other policy tools for long-term affordability of publicly owned or directly acquired parcels, such as a land-lease.

Key Actions:

• Explore land trusts as a tool to preserve affordability citywide and in vulnerable neighborhoods, including evaluating factors such as the upfront cost to invest in unit acquisition, ongoing cost of program administration, length of affordability, and community stewardship.

• Explore other policy tools that promote long-term affordability when land is directly acquired or used for affordable or mixed-income housing development, such as through a land-lease.
SECTION 6.
HOUSING FOR RESIDENTS EXPERIENCING HOMELESSNESS

During the 2017 Point in Time annual account, 3,336 Denver residents had no place to call home, including more than 200 families with children, nearly 500 veterans, and more than 200 unaccompanied youth. Additionally, about 60% of residents experiencing homelessness are a part of Denver’s local workforce.

As a division of the Department of Human Services, Denver’s Road Home, in partnership with the Division of Housing in the Office of Economic Development and the Denver Housing Authority, prevented or ended homelessness for nearly 7,000 people, including more than 1,200 seniors and families, and made nearly 4,000 additional housing units available to those at risk or experiencing homelessness between 2005 and 2015.

Nonprofit and faith-based service providers operate a network of temporary and supportive housing, health services and job training opportunities for those experiencing homelessness in Denver. Today, the City is working alongside these partners to build on the successes of previous efforts and to better integrate and align resources for housing, health services and workforce training within the homeless delivery system. A reliable supply of affordable
rental housing and rental assistance are critical to housing Denver’s homeless population. *Housing an Inclusive Denver* includes housing interventions for households currently without homes as well as those households at risk of becoming homeless in Denver.

Homeless service providers within Denver agree that each person’s experience with homelessness is unique and requires a tailored approach to housing, services, and other supports—rather than a one-size-fits-all solution. A brief analysis of the current challenges and opportunities of the system led the development of priority strategies under two key goals: integrate programs for the unhoused into the City’s initiatives to expand housing options; and expand the tools for financing operating subsidies to provide on-site health and job services.

To meet the goal of adding new housing inventory for the lowest incomes, the greatest area of need is for permanent housing solutions with integrated services, permanent supportive housing (PSH) and rapid rehousing solutions (RRS). PSH, RRS and other permanent housing interventions are shown to lead to higher levels of housing stability. Recognizing that temporary housing solutions, like emergency shelters, are necessary to serve all those experiencing homelessness, this Plan focuses on expanding investments in permanent housing solutions to achieve stronger, more stable, longer-term outcomes for those living without homes.

A small but significant portion of households entering homelessness are doing so after most recently living with friends and/or family, presenting the opportunity for Denver to implement diversion strategies as an intervention point. Successful diversion strategies can prevent homelessness for people entering temporary housing services, like shelter, by helping them identify immediate alternative housing arrangements, and if necessary, connecting them with services and financial assistance to help them return to permanent housing.16

The City of Denver should work with its nonprofit and faith-based service providers to take a dual approach to strengthening the pipeline of permanent and other supportive housing options and providing greater integration of housing, health services and job training opportunities for residents experiencing homelessness. This Plan recommends adding resources to the City’s existing programs to create more permanent housing options for people without homes.

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**RISK OF HOMELESSNESS**

As defined by HUD, individuals or families qualify as “at risk of homelessness” if they meet the following threshold criteria:

a) The individual or family has income below 30% of AMI; and

b) The individual or family has insufficient resources immediately available to retain housing stability and if they exhibit one or more of the following risk factors:

1) Has moved frequently because of economic reasons;

2) Is living in the home of another because of economic hardship;

3) Has been notified that their right to occupy their current housing or living situation will be terminated;

4) Lives in a hotel or motel;

5) Lives in severely overcrowded housing;

6) Is exiting an institution;

7) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.
and leveraging resources with private investments and community partners to expand housing interventions that meet unique client needs.

Addressing the housing and service needs of residents experiencing homelessness will require a combination of strategies over the next five years, including efforts to 1) expand investments in housing options for residents experiencing homelessness and make those options available to shelter providers, 2) build housing capacity through policy and funding alignment, and 3) prioritize supportive services “gap” funding for approved supportive housing projects.

**Recommendation 1: Expand investments in housing options for residents experiencing homelessness and integrate providers across the housing continuum.**

To approach housing across the continuum from homelessness to homeownership, the City will better connect housing options to shelter providers to transition more people from homelessness to housing, divert more people away from shelters to rapid rehousing programs, and through the Denver Street Outreach Collaborative continue to transition people who are not accessing shelters to housing options.

A key element to this strategy is prioritizing the households with the highest level of need for the right housing intervention to reduce demand on the front-end of the system. For example, when households that need PSH can access a unit, rather than being placed into a RRS unit that could be used for a household able to resolve their homelessness more quickly, the City and its partners are better able to provide the right service at the right time to meet individual needs.

To effectively target housing resources, Denver needs to continue its efforts alongside the Metro Denver Homeless Initiative (MDHI), the regional Continuum of Care entity, to establish a well-designed regional Coordinated Entry Systems (CES). The CES will identify, assess and prioritize homeless individuals and families for housing and services based on vulnerability and severity of need. This ensures that people who need assistance the most can receive it in a timely manner.
MDHI, the Denver’s Road Home Division of DHS, and homeless service providers across the region have worked together over the past four years to establish policies and procedures for their CES, OneHome, and identify access points to house Denver’s most vulnerable households.

**Key Actions:**

- Fully implement and expand the Coordinated Entry Systems (CES) outside of Continuum of Care funded projects. CES simplifies the process by which residents experiencing homelessness access housing resources and helps to ensure the right housing intervention is paired with the most appropriate participant. This data-driven process allows communities to provide access to housing resources, to assess individuals or family who enters the homeless response system for their vulnerabilities and needs, to assign housing interventions based on client need, and to create a framework of accountability.

- Develop and align policies with MDHI, the organization currently overseeing OneHome, to ensure that City housing resources dedicated to serve residents experiencing homelessness are targeted appropriately, while maintaining flexibility to serve local needs.

- Employ shelter diversion strategies when people enter the system to help them identify immediate alternate housing arrangements. This could include connections to services or financial assistance to help them return to permanent housing quickly. This frees space in temporary housing shelters for those who do not have alternative options.
Recommendation 2: Build housing capacity through policy and funding alignment.

Denver has already taken steps to build housing capacity and leverage new resources for supportive housing development and services. In 2016 and 2017, the City invested in the Supportive Housing Toolkit alongside the Colorado Housing and Finance Authority and the State of Colorado to provide an intensive finance and development workshop for service providers interested in creating permanent supportive housing in Colorado. Several workshop participants have already received tax credits and are under construction or in the immediate housing pipeline, with some others continuing to look for land acquisition opportunities in Denver.

In addition to these efforts to enhance the ongoing supportive housing pipeline, the City and its partners developed an innovative approach to supportive service provision that is receiving national recognition for its “pay-for-success” approach. This Social Impact Bond (SIB) Initiative is helping to target supportive housing and services to chronically homeless individuals who also struggle with mental health and substance abuse issues. The City and its partners should evaluate the success of this pilot program and explore opportunities to expand the SIB program throughout Denver.

To harness resources and integrate investments across the housing continuum, the City and its partners can leverage and align more resources to develop more supportive housing. The City and its partners should collect and analyze the best practices for underwriting federal, state and local programs to connect these resources to housing options.

Key Actions:

- Develop criteria for providing operating subsidies from the dedicated affordable housing fund to create new supportive housing units.

- Leverage existing, funding streams for supportive housing such as Medicaid, Medicare, and TANF to create more streams of funding for on-site supportive services and operating services.

- Continue to implement and evaluate the success of the Social Impact Bond program and explore opportunities to expand the supportive service tool throughout Denver.
• Evaluate the performance of local projects (working with local partners also undertaking evaluation efforts, such as MDHI) to inform which opportunities resolve episodes of homelessness more quickly and expand the ability to serve additional households, as well as to increase rates of housing placement and stability.

• Complete a comprehensive financial modeling analysis that reviews costs, sources, and uses of the resources necessary for the creation of supportive housing including: capital, operating, rental assistance, and services. This analysis will highlight how resources can be used together effectively, as well as, provide more detail as to where the gaps in funding resources exists.

**Recommendation 3: Prioritize supportive services “gap” funding for approved supportive housing projects.**

As part of a strategy aimed at creating and preserving quality supportive housing projects, the City and its partners should build a supportive services funding program. This supportive service funding program should include a robust framework to evaluate prospective funding opportunities. This framework will need to include a project review process to ensure that the services provider is implementing the supportive housing model such that expected outcomes will be achieved. The City will work closely with the continuum partners to implement best practices for project review and award approval criteria as well as tools to monitor ongoing project performance.

**Key Actions:**

• Prioritize, from the Affordable Housing fund upon recommendation of the Housing Those Experiencing Homelessness Advisory Committee and the Housing Advisory Committee, funding for existing PSH projects, or those anticipated to come online in the next 12-24 months that do not have adequate services funding resources to deliver the intensive services needed to ensure high levels of housing stability for formerly homeless tenants.

• Establish a framework for how to review, rank, and award critical services funding to supportive housing projects in the pipeline.
• Establish a common outcomes framework across programs to evaluate their effectiveness. Recommendations for outcomes-tracking on the effectiveness of supportive housing include: 1) the annual rate of housing stability in project; and 2) returns to homelessness.
SECTION 7.
AFFORDABLE AND WORKFORCE
RENTAL HOUSING

Rental housing development has dramatically outpaced for-sale home development in recent years, with more than 5,600 units built since 2010. Most of the product built in the rental market in Denver in the last several years, like other major cities, are luxury units with prices that are far beyond reach for even Denver’s middle-income earners. Neighborhoods with access to the light rail and near jobs in Downtown Denver command some of the City’s highest rents. Low-income renters are at risk of being displaced from their homes, with few affordable options available within the City. As one survey respondent put it, “I don’t believe we can afford anything else in Denver or near suburbs, so we are stuck.”

Currently, Denver has approximately 140,000 total rental units in the City’s existing stock, including market rate and affordable units.17 Approximately 21,000 of these units have a restriction that keeps the unit affordable, or about 15% of the City’s total rental housing stock. When the City, State, or Federal government invests in affordable housing, an “income-restriction” is placed on the property to keep the price affordable for a low or moderate-income family for a specific time, usually between 20 to 30 years. In Den-
ver, more than 2,200 affordable homes are at risk of becoming unaffordable over the next five years if the existing income-restrictions expire and owners can rent the units at market rate prices. The City could lose its existing affordable housing stock if income-restrictions expire, and households living in these affordable units are also at risk of displacement if the building converts to market rate pricing that is unaffordable to existing households.

Likewise, renters who live in unsubsidized affordable housing (housing that is affordable for low and moderate-income households but does not have an income-restriction) are vulnerable to rent increases that could become unaffordable and threaten to displace existing tenants. Feedback collected through the community engagement process for this plan indicated that many renters are living on month-to-month leases, that living conditions in some unsubsidized properties are substandard, and that evictions are becoming increasingly prevalent. While Colorado has made some changes at a state level to enhance notice to residents when they are required to vacate a rental property, many low and moderate-income households that receive such a notice are left with limited options.

While preservation of the City’s existing affordable housing is a key strategy to stabilize renters, especially in neighborhoods vulnerable to displacement, this report estimates that the City has a gap of nearly 15,500 units for extremely low-income renters (renters with household income at or below 30% of area median income). Higher income households occupying these rental units further exacerbate the availability of affordable rental units for low-income households and increases the gap among extremely low-income households to approximately 21,000 units, and 26,000 units among very low-income households.18

Building new affordable rental housing can help provide expanded options for the low and moderate-income households across Denver that are currently cost-burdened or living without stable homes. Creating new affordable rental housing can also introduce a mix of housing options throughout the city, especially in opportunity-rich neighborhoods with access to transit, high-performing schools and job centers.

The City will pursue a dual rental strategy focused on 1) preserving the affordability of existing rental housing, and 2) increasing the

National Case Studies:
Peer cities, such as San Francisco, have developed bridge financing tools for acquiring existing affordable housing, including both large-scale properties and small-scale rental properties. Their “Housing Accelerator Fund” is a partnership between the City, local foundations, private lending institutions, and local corporations. It aims to strategically acquire properties to prevent families and seniors from being priced out of their homes or evicted while long-term city and state investments are assembled.
production of new affordable and workforce rental housing. The following priority investment strategies were developed and informed by the Affordable and Workforce Rental Housing focus group convened during the planning process, and reflect community feedback collected from surveys and public meetings. See Section 9 for more detailed implementation information.

**Recommendation 1: Preserve existing income-restricted affordable rental housing in vulnerable neighborhoods and near transit.**

Income-restricted housing plays a vital role in Denver’s affordable housing supply. Developments with income-restricted units serve families, seniors, and persons with special needs, and many of these properties have project-based rental assistance contracts that make units affordable to households at or below 30% AMI. Their affordability provisions ensure predictable housing costs for residents relative to their incomes, even as market conditions change. As map 7.2 illustrates, there are clusters of medium to large-scale rental properties with expiring subsidies located near transit.

The City and its partners have taken several steps in the last several years to enhance efforts to preserve existing income-restricted housing stock. In 2015, City Council approved updates to the

<table>
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<th>Income-restricted housing in Denver includes rental units financed through Section 8 and the Low-Income Housing Tax Credit, among other units owned by a variety of private and nonprofit entities; public housing units owned by the Denver Housing Authority (DHA); and for-sale units produced through local partners, such as Habitat for Humanity, Colorado Community Land Trust, and Northeast Denver Housing Center (NDHC).</th>
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<tr>
<td><strong>Total income-restricted units (rental &amp; for-sale)</strong></td>
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<td><strong>Public housing units (owned by DHA)</strong></td>
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<td><strong>Income-restricted properties serving seniors</strong></td>
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<td><strong>Income-restricted properties serving persons with disabilities</strong></td>
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<td><strong>Income-restricted properties serving persons experiencing homelessness</strong></td>
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<td><strong>Income-restricted properties serving “other special needs” populations</strong></td>
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<td><strong>Income-restricted units with expiring restrictions through 2022</strong></td>
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Preservation Ordinance to provide enhanced notice requirements when owners of a property with an existing income-restriction plan to sell, expanding the number and type of projects that are captured under the Ordinance and providing the City or its designee a right-of-first-refusal when a property might be at risk of converting to market rate. Strategies aimed at strengthening the existing Preservation Ordinance are outlined in Section 4.

In partnership with CHFA as the lead agency, the City is also part of the Housing Preservation Network (HPN), where local, state and federal partners are coordinating across Colorado to preserve existing affordable housing stock. As part of this partnership, the City and CHFA have developed an inventory of income-restricted housing, identified initial priority areas and property types for preservation efforts, and conducted outreach to owners of existing income-restricted properties. These efforts are part of the City’s effort to become more proactive in pursuing preservation strategies.

The City provides financing for acquisition and rehabilitation of existing income-restricted properties, usually leveraging 4% Low Income Housing Tax Credits (LIHTCs) administered by CHFA. These resources play a key role in extending the affordability of existing income-restricted properties, but costs have escalated in recent years, especially for prospective property acquisitions with affordability restrictions that are expiring soon. The City and its
HPN partners have also identified a need for new, creative sources of bridge capital that can help acquire affordable properties for long-term preservation.

**Key Actions:**

- Coordinate with HPN partners such as CHFA to leverage the existing inventory of income-restricted properties to develop and maintain a list of priority preservation projects based on expiring restrictions, income and population served, and proximity to transit.

- Pursue proactive strategies to preserve priority preservation projects through acquisition and rehabilitation financing, leveraging 4% LIHTCs, and other local incentives to promote long-term affordability of existing affordable housing stock.

- Develop a bridge finance tool that leverages public and private resources to strategically acquire affordable properties at risk of converting to market rate pricing while long-term finance options can be assembled.

**Recommendation 2: Preserve affordability of unsubsidized large-scale affordable rental properties.**

Given the City’s affordable housing gap for lower-income households, the need to secure affordable rental housing options for these households is paramount, and one of the most efficient ways to secure affordable rental housing is to improve and preserve existing buildings. Denver has more than 130 unsubsidized large-scale affordable rental properties with more than 50 units that have rents at or below FMR. A majority (70%) of these unsubsidized properties are in areas of the city that are vulnerable to displacement. As Map 7.3 illustrates, there are clusters of unsubsidized large-scale affordable rental properties located near transit stations throughout the city.

While the City’s financing tools for acquisition and rehabilitation of affordable properties can be used for unsubsidized affordable housing, a limited number of projects have accessed City resources for this purpose in recent years. The City and its partners should pursue a more proactive approach to identifying, acquiring, and rehabilitating existing unsubsidized large-scale rental properties. Like acquisition and rehabilitation of income-restricted properties,
the City’s financing tools for acquisition and rehabilitation could be leveraged with 4% LIHTCs to preserve these properties long-term. Another local tool that could be leveraged as part of a financing package for preservation of existing affordable housing is the City’s Property Assessed Clean Energy (PACE) program where eligible participants receive capital to finance eligible improvements that promote energy efficiency, renewable energy and water conservation improvements. While PACE investments alone do not come with a long-term income-restriction, the tool could be combined with other local incentives to secure affordability.

**Key Actions:**

- Develop and maintain an inventory of unsubsidized large-scale affordable housing projects in Denver.

- Educate existing owners about the creative finance tools available, including recently adopted PACE financing and other acquisition or rehabilitation resources.

- Support development partners to directly acquire and preserve affordability of existing unsubsidized large-scale affordable housing stock, utilizing new tools that provide bridge financing, City financing, and 4% LIHTCs.

**Recommendation 3: Preserve affordability of unsubsidized small-scale affordable rental properties.**

While there are thousands of existing units in unsubsidized large-scale affordable rental properties across the city (many of them already housing low and moderate-income residents), many more households live in small or medium-scale affordable rental properties: a majority (78%) of the City’s multi-family rental housing stock is between 2-49 units. Data sources that track the location, price, and ownership information of large-scale multi-family properties are more established, so determining this information for small and medium-scale rental housing is challenging.

The current tools available for the preservation of unsubsidized small-scale affordable rental properties are limited in Denver. Leveraging 4% LIHTCs becomes more difficult at this scale due to the smaller number of units unless developers can manage a scattered site portfolio of several small developments. While challenges exist, some peer cities have developed special programs to address small-scale rental stock. For example, San Francisco’s “Small
Site Acquisition Program” funds acquisition and rehabilitation of multi-family rental buildings with 5-35 units. Under this program, properties where immediate risk of eviction of existing tenants due to a sale of the building are given priority for acquisition and rehabilitation resources.

Strategies to explore a rental registry as outlined in Section 4 of this plan could help provide more comprehensive data on the City’s existing small-scale affordable housing.

**Key Actions:**
- Explore a package of finance tools to incent existing owners to preserve small-scale properties, including resources for rehabilitation and potential tax relief.
- Explore development of a finance tool that leverages public and private resources to strategically acquire small-scale unsubsidized rental housing, using San Francisco’s Small Site Acquisition Program as a model.

**Recommendation 4: Promote programs that help households stay in their existing rental housing through comprehensive eviction assistance.**
While investment into preserving existing income-restricted and unsubsidized housing stock can ensure long-term affordability for generations to come, short-term resources that are available to stabilize a renter in their existing home can help mitigate displacement and prevent a resident from becoming homeless.

The City has already taken steps to support renters experiencing a housing crisis by connecting rental assistance programs across the continuum of eviction assistance, especially in vulnerable neighborhoods. These steps include supporting renters experiencing a housing crisis such as a notice of rent increase or sudden loss of income by providing direct financial assistance to help the family stabilize, focused on preventing eviction.

The City also funds programs providing tenant and landlord counseling, and educating residents about their rights and obligations under Colorado Law. Recent efforts to educate residents on their legal rights as tenants include development of a Comprehensive Guide for Landlords and Tenants with information about lease

**GOAL:**

Stabilize Residents 🏡

Housing An Inclusive Denver 82
provisions, circumstances of lease termination, and the rights during an eviction. With a focus on supporting residents who are experiencing an eviction, the Department of Human Services has also placed outreach workers in eviction court to provide direct assistance and resource information for residents facing an eviction. As an additional challenge, low and moderate-income residents that cannot afford representation often navigate eviction proceeding without expert guidance on the specific requirements and opportunities at each step in the process. To enhance its support for residents at risk of involuntary displacement, the City and its partners will explore opportunities to connect those facing eviction with legal assistance.

Key Actions:

- Continue to support direct financing assistance programs aimed at stabilizing households experiencing a housing crisis across the eviction spectrum and in vulnerable neighborhoods.

- Continue collaborative efforts with public and private partners to educate residents in vulnerable neighborhoods about their rights as tenants.

- Explore opportunities to connect those facing eviction with legal assistance.

Recommendation 5: Promote development of new affordable, mixed-income and mixed-use rental housing.

Given the gap in existing affordable options for low and moderate-income households in Denver, the City will focus on providing choices along the housing continuum via new affordable and mixed-income development. This includes creating new housing for residents experiencing homelessness with supportive services, low-income residents living on a fixed-income, and “missing middle” housing options for families and individuals. The City provides financing for development of new affordable units, typically with LIHTC administered by CHFA. While 9% LIHTCs are highly competitive, the Colorado state tax credit has been a key tool in jump starting the non-competitive 4% LIHTCs across the state. Opportunities to extend and enhance the state tax credit are outlined in Section 4.

The need for new affordable rental housing is great across Denver, and the City will continue to support development projects across
all neighborhood types, but new development can act as a tool to bring affordability to areas near transit, job centers, and with high-performing schools. New development of affordable rental housing also provides an opportunity to address the unique challenges and provide housing for special populations such as seniors, people with disabilities, or residents experiencing homelessness. New construction can also provide opportunities to introduce unique design elements to serve specific populations, such as live-work units for artists.

And as demand for housing increases, the need for services increases—including transit access, retail and business services, as well as community facilities such as child care or outpatient health care. Mixed-use developments can bring life to neighborhoods lacking critical amenities such as grocery stores, incubator or worker space, or retail and increase access to opportunity throughout Denver neighborhoods.

**Key Actions:**

- Explore finance mechanisms to better support mixed-income development that includes “missing middle” housing products and related financing tools, including gap financing, bridge financing, and loan guarantees.

- Explore ways that the City’s zoning code and finance mechanisms can support live-work units for artists, among other occupations, through targeted mixed-use developments and worker space.

- Expand partnerships with local employers to contribute to a housing fund to expand workforce rental housing.

**Recommendation 6: Promote programs that help households access affordable rental housing.**

In 2016, more than 5,600 new rental units came online, a record high, and in 2017 over 2,000 more will be added. While the city’s population has grown by over 100,000 over the last several years and the new rental development is helping to accommodate this surge in new residents, many new buildings throughout the city have above average vacancy rates, leaving hundreds of existing units empty. Elsewhere, low and moderate-income households are searching for affordable options in Denver and finding limited available options. Partnership with these market rate owners can help “buy down” the cost of vacant units to a price point that is afford-
able for working households to help connect residents searching for housing options with existing vacant units.

The City has already taken steps to develop a Lower Income Voucher Equity (LIVE) Denver program aimed at connecting working families with vacant units, focusing on bringing those new affordable opportunities into high opportunity areas with access to transit, job centers and high-performing schools. The LIVE Denver program is being developed in partnership with the Denver Housing Authority and can also act as a tool to connect residents with existing Housing Choice Vouchers (many of whom are struggling to find landlords that will accept HUD’s FMR due to rising market costs) to existing vacant units. The LIVE Denver program is an innovative opportunity to pilot a tool for developing mixed-income communities.

The City also provides direct financial assistance to residents to access existing housing units through the Tenant-Based Rental Assistance Program (TBRA). These resources act as a rapid re-housing tool to connect residents experiencing homelessness to bridge housing solutions for a period of 6-24 months. Additional investment strategies related to serving residents experiencing homelessness are outlined in Section 6. Assessment of TBRA as a tool for rapid re-housing of residents experiencing homelessness should be considered as part of the strategy to “right size” interventions appropriate for the individual household.

As part of its homelessness strategies, the City will employ shelter diversion strategies when people enter the system to help them identify immediate alternate housing arrangements. This could include connections to services or financial assistance to help them return to permanent housing quickly. This will also limit the inflow of clients who enter the system in the first place and make more space available for those who do not have alternative options.

**Key Actions:**

- Implement and evaluate success of a proposed LIVE Denver program to buy down affordability of existing vacant rental units in high-opportunity areas of the city.

- Assess existing TBRA investment as part of the continuum of financial assistance to help residents experiencing homelessness return to permanent housing, including how the tool can prioritize individuals with the greatest need from the Coordinated Entry System.
Section 8
ATTAINABLE HOMEOWNERSHIP
SECTION 8. ATTAINABLE HOMEOWNERSHIP

Like other high cost cities, low and moderate-income homeowners in Denver face a range of unique challenges with rising property values and upkeep associated with older homes that threatens to displace long-time neighborhood residents. Nearly 35,000 homeowners across the city are living in unaffordable situations and paying too much of their income on housing costs, including about 11,000 seniors. Many of these homeowners live in areas where property values increased significantly between 2015 and 2017 property assessment cycles.

But a significant barrier to homeownership is the current cost of for-sale homes. For-sale home values have increased by 30% since 2015, and residents interested in achieving homeownership are finding themselves priced out of the city, even in areas that have historically more affordable options. Many comments in the online survey reinforced this finding, with residents noting that their housing was only affordable because “I bought my house in 1991. We could not afford to purchase a comparable home in our neighborhood today,” or that “our same home would be 50% [more] if we tried to buy it now.”

The City and its partners aim to support existing homeowners through several repair and relief programs, but is also focused on connecting low and moderate-income residents with wealth
building potential through homeownership. While homeownership plays a key role in promoting economic mobility and opportunity for residents through wealth building, the City is also focused on the long-term affordability of existing for-sale housing stock and will explore strategies aimed at promoting long-term affordability such as through land trusts.

**Recommendation 1: Promote programs that help households maintain their existing homes.**

Nearly half of all cost-burdened homeowners live in vulnerable neighborhoods throughout the city. Property values are rising in these areas, and many households are struggling to keep up with the rising costs of taxes and the cost of critical home repairs. Partners like the Denver Urban Renewal Authority administer programs that offer rehabilitation resources for existing low and moderate-income homeowners, including the Single-Family Rehabilitation program, the Emergency Home Repair program, and the Rental Homeowner Access Modification program. These programs provide emergency home repair, accessibility modifications and substantial rehabilitation services for seniors and other low-income households to prevent displacement. The City and its partners should continue to support these programs, and target resources to serve households in neighborhoods with the highest home price appreciations where low and moderate-income residents are at risk of displacement, and explores pathways for return for those who have been displaced.

With rising home values, the City and its partners should also work to promote existing property tax relief programs, focusing on reaching residents living on a fixed income, including seniors and those with a disability, in vulnerable neighborhoods. Property tax relief strategies are discussed in more detail in Section 4, including exploration of property tax relief programs that are more broadly aimed at stabilizing low-income homeowners.

While a limited proportion of parcels citywide are zoned appropriately and have the minimum lot size necessary to build an accessory dwelling unit or “ADU,” some low- and moderate-income homeowners in vulnerable neighborhoods in West Denver and North Denver have the appropriate zoning and lot sizes to build such additional units. Across the country and in a limited number of circumstances in Denver, development of ADUs have been used as a tool to introduce new affordable rental stock into predominantly
single-family neighborhoods. But ADUs can also provide a wealth-building tool (due to the rental income received over time) and support intergenerational households. Recognizing the potential for ADUs to stabilize low and moderate-income households at risk of becoming displaced from their existing homes due to rising prices, the City and partners are developing programs aimed at providing financial tools, streamlined permitting, and property management support to promote development of ADUs.

Creative programs that help residents, especially older adults, age in place include those focused on connecting residents that are “overhoused” with those searching for affordable options. A household is considered “overhoused” when they are living in a unit that is larger than is needed for their family size. For example, one older adult living in a home with three bedrooms could be considered overhoused. Programs aimed at connecting homeowners with extra living space to possible renters present a creative solution to addressing the city’s housing challenges, and introduce affordable options that complement development and preservation of housing units.

Alongside programs that focus on maintaining the physical structure and affordability for existing homeowners, a key component of homeownership success is ongoing financial assistance. The City and its partners should continue to promote financial literacy programs such as ongoing budget and credit counseling through nonprofit partners, banking institutions, and Denver’s Financial Empowerment Centers.

**Key Actions:**

- Target existing homeowner rehabilitation programs to low and moderate-income homeowners in vulnerable neighborhoods throughout the city, such as the Denver Urban Renewal Authority’s Single-Family Rehab and Emergency Home Repair programs.

- Promote ongoing education for existing homeowners through financial literacy, focusing on outreach to low and moderate-income residents in vulnerable neighborhoods.
• Promote development of accessory dwelling units as a wealth building tool for low and moderate-income homeowners in vulnerable neighborhoods and to support intergenerational households.

**Recommendation 2: Promote development of new affordable and mixed-income homeownership stock.**

One tool that some cities across the country use to develop affordable and mixed-income for-sale housing is “inclusionary zoning” or an “inclusionary housing ordinance.” Denver originally adopted an Inclusionary Housing Ordinance (IHO) in 2002, requiring for-sale developers building more than 30 units to set aside 10% as affordable to moderate-income households. While the ordinance was modified several times since its adoption, the ordinance created a limited number of affordable homes, with many developers opting to pay “cash-in-lieu” of construction. The vast majority of affordable homes constructed were through large scale development agreements negotiated based on the sale of City-owned land (for example, from the former Stapleton airport) or with a large single developer (for example, Green Valley Ranch).

In 2016, the City replaced the IHO with a “housing linkage fee” that is more broadly applicable to new residential and commercial development. The housing linkage fee is structured in some ways as a reverse of the IHO, where developers of new residential and commercial buildings are required to pay a per square foot fee, but have the option to build affordable units instead. Strategies aimed at developing a package of incentives that encourage development of affordable units on site are outlined in Section 4.

While the transition to a more broadly applicable housing linkage fee will provide new funding for the development and preservation of affordable housing, new and creative tools to create mixed-income homeownership stock should be explored. Some communities are supporting mixed-income condominiums through the development of cohousing where individual units are grouped together in a single building with shared amenities. Cohousing developments are often coupled with community based stewardship where residents share responsibility for maintenance of community space. Mixed-income cohousing development has been constructed in Denver as part of the Aria Denver community and could potentially be developed in other areas throughout the city.
To help spur condominium development more broadly, Denver adopted a local ordinance in 2015 that 1) limits using a violation of the Denver building code as the basis for a construction defects claim, 2) requires majority consent of affected homeowners before an HOA can pursue a construction defects claim, and 3) promotes arbitration, not court, as the forum for a construction defects claim. Recent changes to state law and recent court rulings have further addressed these issues and may help to improve the condo market. Since condominiums can provide a path to more moderately priced attached housing, this ordinance unlocked the potential for development of more attainable options for moderate-income residents in Denver.

To further promote condominium development, the City and its partners are taking steps to pilot the development of mixed-income condos at the 29th and Welton, a transit-oriented development site at in the Five Points neighborhood, in partnership with the Regional Transportation District (RTD). The development will include at least 25% of the units as affordable and is intended to inspire creative ways to finance affordable homeownership options in partnership with the development community. Using the 29th and Welton project as a model, partnerships that support mixed-income condominium development can promote affordable housing options in high opportunity areas.
Key Actions:

• Explore creative tools to promote mixed-income homeownership development, including models such as cohousing development that are supported through strong community stewardship.

• Implement and evaluate success of the mixed-income condo pilot at 29th and Welton and explore how the approach can be expanded to other areas of the city, especially near transit.

Recommendation 3: Preserve affordability of existing income-restricted homeownership stock.

Nearly 2,000 for-sale homes in Denver are affordable due to an existing covenant that ensures the property is occupied and resold to an income qualified buyer over a specific period, usually between 15-30 years. Many of the homes were built under the City’s Inclusionary Housing Ordinance or large-scale development agreements, and while the ordinance was replaced with a more broadly applicable housing linkage fee, homes under the old program continue to operate under existing covenants.

Most of the homes that were built under the IHO or similar development agreements have a shared equity model where proceeds from the sale of the property are shared between the City and the homeowner for a set period after the covenant expires. Typically, the covenants also include a right-of-first refusal for the City or a designee to acquire the property to sell to another income-restricted buyer. With limited affordable homeownership options available on the open market for low and moderate-income households, the City and its partners should focus on keeping these homes available as part of the existing income-restricted for-sale housing stock and promote long-term affordability. Additionally, since most homes built under the IHO or similar agreements are in mixed-income developments due to the structure of the original ordinance, many of these homes are in high opportunity areas.

For example, nearly 500 affordable homes have been constructed as part of the Stapleton development agreement, an area that now includes some of the city’s most expensive housing stock and highest quality schools. Covenants on affordable units built at Stapleton will begin to expire in 2018 and 2019, approximately 15
years after the first units were built in this neighborhood. The City and its nonprofit and foundation partners are already taking steps to explore long-term preservation of these homes to ensure future income-qualified homeowners can purchase homes in these high opportunity areas.

In addition to partnerships aimed at preserving existing income-restricted housing, the City is also focused on continuing education for existing owners of affordable homes. As part of an effort to ensure compliance with the requirements of the City’s existing covenants, the City should conduct regular outreach to existing owners about the requirements of their covenant, including 1) that owners occupy the unit as their primary residence, 2) that units are resold to an income-qualified buyer at an affordable price during the covenant period, and 3) how owners can access ongoing financial literacy and credit counseling even after purchasing an affordable unit.

**Key Actions:**
- Explore partnerships across key nonprofit and foundation partners to preserve existing affordable homes in high-opportunity areas, such as Stapleton, to resell to qualified buyers.

*The City offers continuing education for existing owners of affordable homes.*
• Continue to educate existing homeowners about requirements of the City’s affordable homeownership covenant as part of an ongoing compliance program.

**GOALS:**
- Preserve Affordability
- Stabilize Residents

**Recommendation 4: Preserve affordability of existing unsubsidized affordable for-sale housing.**

Preservation of existing affordable homeownership opportunities for Denver residents is an important strategy to mitigate the displacement of residents due to rising home values. Between rental and conventional homeownership, shared equity ownership models ensure that homes remain affordable to low and moderate-income households long-term. Models that promote long-term affordability and shared equity include land trusts, which enable eligible households to purchase an affordable home and lease the land underneath it. Land trust models and other similar models such as a land lease are discussed in Section 5.

In addition to exploration of a citywide land trust and land lease policies as outlined in Section 5, the City and its partners could explore other models for preservation such as through “shared appreciation loans.” Shared appreciation loans are second mortgages that require no payment by an owner until a property is sold. At the time of the sale, a family is required to repay the original principal plus a share of the home price appreciation in lieu of interest. Typically, homes purchased under a shared appreciation loan and then resold to an income qualified homeowner to continue the long-term affordability.

*By extending the 2017 Mortgage Credit Certificate Program, qualifying borrowers can save thousands over the life of a mortgage. This program helps residents access housing throughout Denver.*
Key Actions:

- Explore creative tools for acquisition of existing affordable homes, including models such as a “shared appreciation loan” that could help a moderate-income homebuyer purchase a home with a second mortgage payable at the time of sale to another income-qualified buyer.

Recommendation 5: Promote programs that help households access for-sale housing.

While development and preservation of affordable homeownership units can help ensure that housing options are available for moderate-income residents long term, the City and its partners should also focus on support programs that help residents prepare to become homeowners. The City and its partners provide homebuyer counseling courses that integrate financial coaching with down payment assistance and education about overseeing home repairs.

The City and its partners could continue to support downpayment assistance programs such as the Metro Mortgage Assistance Plus Program. Through this program, the City works with lenders throughout the Denver metro area to offer qualifying first-time homebuyers with a grant to help with up to 4% of the purchase price of a home. Since 2013, this Metro Mortgage Assistance Plus Program has supported the home purchases of 1,277 households with $10.8 million in assistance. The City also supports downpayment assistance programs directly through nonprofit partners.

The City also took steps to extend the 2017 Mortgage Credit Certificate Program that allows qualifying borrowers to receive an annual federal income tax credit equal to 25% of the annual interest they pay on their mortgage loan up to a maximum $2,000 per year. The program, which can save a low or moderate-income family thousands over the life of a mortgage, extends through the end of 2019. As part of a strategy to promote programs that help residents access for-sale housing throughout Denver, the City and its partners should continue to support the Mortgage Credit Certificate program beyond the current program sunset.

In addition to supporting the city’s existing programs for prospective homebuyers, the City and its partners should explore other creative tools to support homeownership. For example, the proposed LIVE Denver pilot is designed to support residents living in affordable rental housing by setting aside a portion of rent paid
each month to contribute to an escrow account that can be accessed when the resident moves out of the affordable rental property. While this escrow account is not proposed to be limited to use for a future downpayment, this tool could be an effective method to help low and moderate-income residents to save for a down payment. The City and its partners should implement and evaluate the success of this pilot escrow model and explore how the approach can be expanded to other homeownership programs.

Likewise, the City and its partners should explore other creative ways to help moderate-income residents achieve homeownership, including evaluating opportunities for lease-to-own programs or low-interest city loans that might allow a family to refinance their current mortgage and stay in a home they already own.

Key Actions:

• Continue to support existing down payment and homebuyer assistance programs such as the Metro Mortgage Assistance Plus programs that provides grants for low and moderate-income residents to purchase homes on the open market.

• Support an extension of the Metro Mortgage Credit Certificate to help low and moderate-income homeowners receive a federal
income tax credit on their mortgage interest beyond the program’s current expiration in 2019.

• Implement and evaluate success of a pilot escrow model as part of the LIVE Denver program where residents pay a portion of rent each month into a saving account that can be used for a down payment, and explore how the approach could be expanded to other housing programs.
A central theme of *Housing an Inclusive Denver* is the need for the City to integrate its housing work across sectors, among City departments, and with external partners. Implementing *Housing an Inclusive Denver* depends on the ability to maximize the impact of the City’s housing investments by aligning and connecting them to other public investments in jobs, health, education, capital infrastructure and transportation. This plan lays the foundation for targeting the City’s resources to address specific neighborhood conditions and challenges faced by Denver residents. The neighborhood opportunity typology developed to support this plan and the targeted strategies to address specific neighborhood conditions can serve as a platform to build the necessary connections to opportunity for Denver residents.

**Prioritization Along the Housing Continuum**

Feedback received during the development of *Housing an Inclusive Denver* from members of the public, housing stakeholders and the city’s Housing Advisory Committee focused on finding a balance of investment along the housing continuum. This feedback is a recognition that each segment of the housing continuum is connected and resources are limited. Allocating more resources towards one part of the spectrum therefore diminishes resources available for the rest of the continuum. Further, the costs of development, preservation and programs vary along the continuum – for example,
to develop a permanent supportive housing unit with wraparound services may cost more than the preservation of a moderate-income rental unit. Maximizing the impact of limited resources across the housing continuum requires an ongoing assessment of need, estimation of costs, and evaluation of available resources. For this reason, the target resource allocations in this plan are given as ranges that recognize the interplay of multiple factors that must be continually balanced to optimize results.

While investment along the housing continuum can help ensure there are options for each population, feedback received from the public, housing stakeholders and members of the Housing Advisory Committee indicated a need to target housing resources toward the most vulnerable residents in Denver, those experiencing homelessness and those earning below 30% AMI. Based on feedback received as part of the Housing an Inclusive Denver planning process, the following targets will be used to guide housing investments aligned with the values, goals and strategies included in this plan:

40 - 50% of housing resources will be invested to serve people earning below 30% of area median income (AMI) and those experiencing homelessness who are seeking to access or maintain rental housing, including:

- **20 - 25% of housing resources** to serve residents experiencing homelessness

- **20 - 25% of housing resources** to serve residents earning below 30% AMI

20 - 30% of housing resources will be invested to serve people earning 31% to 80% AMI who are seeking to access or maintain rental housing

20 - 30% of housing resources will be invested to serve residents seeking to become homeowners or remain in homes they already own

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<tr>
<th>AMI Level</th>
<th>1 Person</th>
<th>2 Person</th>
<th>3 Person</th>
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2017 Area Median Income Limits

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The city will provide quarterly updates on the implementation of investments consistent with these funding priorities.

**Target Outcomes from Housing Investments**

In total, the City’s Office of Economic Development (OED) invests more than $20 million in federal and local resources into housing development, preservation and programs each year. However, federal resources have declined in recent years and are subject to annual appropriations from Congress. Find more detailed information about each federal and local resource available for housing investment in **Section 10: Key Supplemental Information**.

As outlined in this plan, *Housing an Inclusive Denver* includes four key goals:

**GOAL: Create affordable housing in vulnerable areas AND in areas of opportunity** by focusing on production that considers specific neighborhood conditions, including areas vulnerable to displacement and neighborhoods that have strong amenities such as transit, jobs, high quality education and health care.

**TARGET OUTCOMES:** If local and federal resources remain consistent with current levels, the City and its partners will aim to create at least 2,000 new affordable units by 2023. Of these new units, approximately 90% are expected to serve renters and 10% are expected to serve homeowners.

**GOAL: Preserve affordability and housing quality** by investing to maintain affordability in non-subsidized units and preserving or continuing affordability of existing publicly subsidized affordable housing.

**TARGET OUTCOMES:** If local and federal resources remain consistent with current levels, the City and its partners will aim to preserve at least 1,000 existing affordable units by 2023. Of these new units, approximately 90% are expected to serve renters and 10% are expected to serve homeowners.

**GOAL: Promote equitable and accessible housing options** by supporting programs and policies that help residents across the housing continuum access affordable housing.

**TARGET OUTCOMES:** If local and federal resources remain consistent with current levels, the City and its partners will aim to serve at least 20,000 households by 2023 with program resources such as homebuyer counseling, downpayment assistance, and supportive services.
GOAL: Stabilize residents at risk of involuntary displacement by supporting programs and policies that help a resident maintain their existing housing or stay in their community.

TARGET OUTCOMES: If local and federal resources remain consistent with current levels, the City and its partners will aim to serve at least 10,000 households by 2023 through program investments such as tenant – landlord counseling, eviction assistance, and emergency home repair programs.

Expanding Denver’s Existing Toolbox

This plan includes several innovative ideas for housing strategies, with programmatic and financing or subsidy implications. The City is committed to exploring these strategies in partnership with for-profit and nonprofit partners, other City departments and public agencies, and other key stakeholders. This plan introduces several new policies, programs or financing tools to support strategies and address neighborhood conditions.

Implement and evaluate success of existing pilot programs:

• Evaluate success of the current “tiny home” pilot program and explore opportunities to expand the program throughout other areas of Denver.

• Implement and evaluate success of a proposed incentive overlay for building heights at the 38th and Blake transit station and explore expanding the program to other areas where increased density may be appropriate, such as near transit.

• Implement and evaluate success of a proposed LIVE Denver program to buy down affordability of existing vacant rental units in high-opportunity areas of the city.

• Implement and evaluate success of a pilot escrow model as part of the LIVE Denver Program where residents pay a portion of rent each month into a savings account that can be used for a downpayment, and explore how the approach could be expanded to other housing programs.

• Implement and evaluate success of the mixed-income condo pilot at 29th and Welton and explore how the approach can be expanded to other areas of the city, especially near transit.
Explore new or expanded tools for housing development and preservation programs:

- **Create a package of incentives that provide value for a developer**, such as more clearly defined parking reductions, lower building permit fees, or special staff support to navigate the complex multi-agency permitting process, in exchange for a certain percentage of affordable units built on site.

- **Develop clear guidelines for the circumstances when an affordable housing plan** (such as sites with a General Development Plan, Infrastructure Master Plan, or similar tool) **should be created for a major redevelopment site** and provide clear guidance on the process to develop and execute the plan.

- **Explore creative uses of tax-increment financing** that can support low and moderate-income residents, including how TIF can be used to support the city’s anti-displacement strategies,
in close partnership with the Denver Urban Renewal Authority and Denver Public Schools.

- **Explore a rental registry to promote the safety and well-being of all renters**, which would require landlords to register their rental properties and participate in regular inspections for health and safety issues.

- **Explore additional local forms of tax relief for low- and moderate-income residents** struggling to keep up with rising property taxes, such as expanding the existing senior and disabled property tax relief program.

- **Explore framework and methodology used to develop and implement preference policies** in peer cities, evaluating whether and how a preference policy based on economic displacement could be implemented in Denver.

- **Explore property tax relief programs that support property owners of multi-unit buildings** who may not qualify for the existing nonprofit exemption to foster mixed-income developments.

- **Explore additional tools to expand and enhance the State Low Income Housing Tax Credit** to support rental housing projects in Denver, and other local jurisdictions, in close partnership with the Colorado Housing and Finance Authority and the Colorado Division of Housing.

*The City can partner with the Denver Public Schools to explore creative uses of tax-increment financing to support low and moderate-income residents, and the City’s anti-displacement strategies.*
• **Explore formal partnerships with public and quasi-public agencies** to prioritize and set specific standards for use of publicly owned land for affordable housing.

• **Explore land trusts as a tool to preserve affordability citywide and in vulnerable neighborhoods**, including evaluating factors such as the upfront cost to invest in unit acquisition, ongoing cost of program administration, length of affordability, and community stewardship.

• **Explore other policy tools that promote long-term affordability** when land is directly acquired or used for affordable or mixed-income housing development, such as through a land-lease.

• **Develop a bridge finance tool** that leverages public and private resources to strategically acquire affordable rental properties at risk of converting to market rate housing.

• **Explore development of a finance tool to strategically acquire small-scale unsubsidized rental housing**, using San Francisco’s Small Site Acquisition Program as a model.

*The City can explore formal partnerships with public and quasi public agencies to prioritize standards for using publicly-owned land for affordable housing.*
• Explore creative tools to promote mixed-income homeownership development, including models such as cohousing development that are supported through strong community stewardship.

Implementing Proactive Investment Strategies

In addition to the implementation and evaluation of proposed pilot programs and the exploration of new or expanded housing tools, the City will implement recommendations from Housing an Inclusive Denver through proactive investment strategies, including:

1) Targeting development solicitations to procure partners to build or preserve affordable housing consistent with the values, core goals and strategies outlined in this plan. These targeted development solicitations, for example, could include development on land acquired directly for affordable housing or partners to serve as a designee to purchase a rental property under the City’s Preservation Ordinance.

2) Updating the City’s competitive opportunities for housing program and service funding to align with the values, core goals, and strategies outlined in this plan. These competitive opportunities, for example, should align with the City’s Consolidated Plan for federal resources and future solicitations for program proposals through the City’s Notice of Funding Availability (NOFA) for federal resources.

3) Updating the City’s financial products for housing development and preservation projects to reflect the values, core goals, and strategies outlined in this plan. These updated financial products could include specific tools to incentivize development of housing for the city’s most vulnerable populations earning below 30% AMI, such as through performance based loans or higher per unit subsidies.

4) Updating the City’s application process for housing investments to reflect the values, core goals, and strategies outlined in this plan. These updated application processes, for example, could include specific location priorities for housing investments in vulnerable neighborhoods or in high opportunity areas. This plan recognizes that Denver’s neighborhoods differ depending on location, neighborhood conditions, and access to opportunity.
5) **The city will provide quarterly updates on the implementation of investments consistent with these funding priorities.**

Investment of local and federal resources for priority strategies outlined in *Housing an Inclusive Denver* will be informed by neighborhood data collected in this plan, as well as subsequent efforts to build on this framework to understand opportunity in Denver.

The City will prioritize strategies to mitigate displacement in vulnerable areas and create housing opportunities in neighborhoods currently out of reach of low-income households. The Annual Action Plan will further refine the targeting of strategies and related action by income and geography.
DENVER THE MILE HIGH CITY

SECTION 10. KEY SUPPORTING INFORMATION

Denver’s Future Housing and Demographic Trends

Several long-term demographic trends could shape the city’s housing market over the next five years and beyond: growth in Denver’s senior population; smaller household sizes and fewer households with children; and growth in Hispanic households. These demographic trends may reshape Denver’s for-sale market, create increased competition for smaller units and a greater understanding of the unique housing needs among Hispanic households.

Growth in Denver’s senior population. Like much of the United States, Denver is growing older. Denver’s senior population increased 35% between 2010 and 2017. Between 2017 and 2035, projections suggest that the number of seniors in Denver will increase by 52% between 2017 and 2035, representing the largest share of Denver’s population growth over that time. The city’s past and future growth in seniors age 65 and older will clearly drive the needs and considerations of developing and siting future housing. These needs and considerations include creating more income-restricted housing targeted for seniors, incorporating accessibility features in senior housing, promoting access to health services, and supporting local programming to help seniors successfully age in place. Less apparent is how this growing population will affect the city’s overall housing supply. Depending on seniors’ ability and willingness to find senior-friendly housing, seniors may stay in their
current housing situations. If these seniors are over housed (meaning they live in larger units than may be appropriate), this could result in limited turnover in larger rental units or for-sale inventory, making it difficult for other households to access these products. Seniors also currently make up a growing number of the city’s population experiencing homelessness with recent estimates showing nearly a quarter of the homeless in Denver are over age 55. This growth in homeless seniors places unique stressors on the City’s current system for helping those without homes.

**Smaller household sizes and fewer households with children.**
Today, most of Denver’s households do not have children, and projections suggest these households will increase by 29% between 2017 and 2035. Denver’s households are already smaller than the national average household size (2.28 compared with 2.58 respectively) and average household size in Denver is expected to decrease over time. In terms of Denver’s for-sale market, fewer households with children and smaller households could open more neighborhoods to new homebuyers, as considerations that have traditionally influenced home buying decisions like school quality and reputation, become less relevant to these households (at least in the short-term). Along with seniors, these households may seek smaller units (like one bedrooms), driving additional demand for smaller housing products. This demand could further constrain the city’s existing supply of smaller rental units and drive up these housing costs. Currently, efficiencies and one-bedroom units command rents 13–15% higher than Fair Market Rent (FMR). Asking rents above FMR suggests that households using rental assistance

![Denver’s household sizes are expected to decrease over time, with fewer children making up the total population.](image)
like Section 8 Housing Choice vouchers may already be having trouble accessing these units, and additional demand from smaller households could exacerbate this problem.

**Growth in Hispanic households.** Today, Hispanic households comprise 35% of all Denver households. It is estimated that 65% of Hispanic households qualify as low-income and make up a smaller share of new homeowners and home loan recipients than the city average. By 2030, Hispanic households will comprise 41% of all Denver households, representing the city’s largest growth in households between 2017 and 2030. This growth suggests a need to consider housing needs among this population in greater detail. It’s important to note to these households are not a homogeneous group and additional outreach and information-gathering may be necessary to understand the core housing needs for a range of lifestyles, ages, and income levels among Hispanics living in Denver. A few ways that these households could define Denver’s housing market in the next several years is acting as new homebuyers, creating more demand for multigenerational housing products, and highlighting a need for more culturally competent housing-related programming and service delivery.

**Investment in Public Infrastructure.** Over the next three years, Denver will experience a wave of public investments valued at more than $4 billion. The projects include expansion of the city’s Convention Center, the National Western Center Complex, Central I-70, the Great Hall of the Denver International Airport, and the projects in
the proposed General Obligation Bond. The projects will create jobs, important infrastructure buildouts and community amenities. The investments may also put pressure on the city’s housing market, as the need for additional skilled workforce for these projects could attract more residents to Denver.

Relationship to Other Local Planning Efforts

*Housing an Inclusive Denver* builds on and relates to several past and current planning efforts in the City of Denver. The goals and proposed strategies within *Housing an Inclusive Denver* aim to connect with the City’s update to its land-use and mobility strategies (through Denveright), priorities related to its federal resources for housing and community development (through the 2018–2022 Consolidated Plan and Analysis of Impediments), and connections to jobs and health through the Mayor’s Office of Housing and Opportunities for People Everywhere (HOPE). Each plan and their relationship to *Housing an Inclusive Denver* is summarized in more detail below.

**Denveright.** Through its extensive community-driven planning process, Denveright will chart a course for Denver’s future through 2040. This effort integrates four plans: 1) *Blueprint Denver*, the City’s existing land-use and transportation plan, which serves as the foundation for the Denveright process; 2) *Game Plan*, the citywide Parks and Recreation Plan, which provides quality open space and improved existing networks for people to walk, bike, relax and play; 3) *Denver Moves: Transit*, which creates a local transit vision.
to understand and improve the existing transit system; and 4) Denver Moves: Pedestrian and Trails, which helps make walking and using off-street trails a viable option for people to get around Denver.

Many of the proposed strategies within Housing an Inclusive Denver relate to the four focus areas within Denveright. The strategies adopted in this plan reinforce and help implement a key vision element from Denveright – creating “Equitable, Affordable and Inclusive” communities. Denveright aims to achieve this vision element by supporting community values such as diverse, friendly and open communities, promoting access to opportunity, and by fostering affordable housing and transportation choices. Through its focus on access to opportunity and promotion of affordable and mixed-income housing options, this plan supports the broader vision element of Denveright and provides the basis to achieve its community values through specific regulatory and investment strategies.

2018-2022 Consolidated Plan. The Consolidated Plan supports Denver’s assessment of its affordable housing and community development needs and market conditions and creates a communitywide conversation to identify and align housing and community development priorities and allocate federal resources. Analysis and recommendations from Housing an Inclusive Denver will directly inform the City’s affordable housing and community development needs and market conditions within the Consolidated Plan. Additionally, Housing an Inclusive Denver makes recommendations for the allocation of the City’s federal and local resources.

Housing Denver. Housing an Inclusive Denver incorporates some of the foundational ideas outlined in Housing Denver, including the need for diverse and flexible funding tools, strategies that address the housing continuum, and a focus on production and preservation of affordable housing.

Gentrification Study: Mitigating Involuntary Displacement. In May 2016, the City released the Gentrification Study: Mitigating Involuntary Displacement, to serve as a tool to guide future housing and economic development investments in Denver. The study aimed to identify the factors that cause residential displacement, identify neighborhoods where displacement is occurring, or could happen, and inform how the City and its partners promote equitable and inclusive neighborhoods. Housing an Inclusive Denver utilizes the
information from this study to help identify neighborhood types and inform strategies, priorities, and key actions to mitigate involuntary displacement.

**Analysis of Impediments (AI).** The U.S. Department of Housing and Urban Development’s (HUD) Affirmatively Furthering Fair Housing rule, or AFFH, guides municipalities’ work to ensure that housing investments are aligned with fair housing principles. This fair housing rule embraces a “balanced approach” between place-based capital investments in low-income communities and strategies promoting mobility that allow low-income households to gain access to safe neighborhoods and high-performing schools. Under this rule, recipients of HUD resources are required to submit an Analysis of Impediments (AI), a community-based plan that sets goals and priorities that address contributing factors to segregation and other fair housing issues to better address historical disinvestment and support racial equity. The City of Denver will participate in a regional AI in 2018. *Housing an Inclusive Denver* describes and defines “racially or ethnically concentrated areas of poverty,” “areas of low-income concentration,” and “areas of minority concentration” in ways that set the stage for the region’s AI and aligns its strategies with broad fair housing goals.

**Detailed List of Denver’s Housing Resources**

The Office of Economic Development (OED) invests federal and local resources into affordable housing development, preservation and programs that serve residents experiencing homelessness, extremely low-income residents living on a fixed income such as

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**CDBG funds support small businesses, neighborhood revitalization, homeowner and rental repair, counseling and social service operations.**
seniors or residents with a disability, working families, and residents interested in becoming homeowners.

Federal housing funds are allocated to the City and County of Denver through the U.S. Department of Housing and Urban Development (HUD). Federal funds have declined in recent years, but include:

- **Community Development Block Grant (CDBG)** — CDBG funds support small businesses, neighborhood revitalization, homeowner and rental repair, counseling and social service operations. The City typically receives between $6 and $8 million annually through the CDBG program, but these resources are invested across a variety of housing, neighborhood and business development programs. OED typically invests approximately $2 million annually in housing through the CDBG program.

- **HOME Investment Partnerships Program (HOME)** — HOME funds support a variety of affordable housing activities including new construction and preservation of rental and for-sale housing, and tenant based rental assistance. The City typically receives approximately $2.5 million annually through the HOME program.

- **Housing Opportunities for Persons with Aids (HOPWA)** — HOPWA funds are available to assist in the provision of affordable housing for persons with HIV/AIDS. The City typically receives approximately $1.7 million annually for the HOPWA program.

Local housing funds are appropriated to OED through the City’s annual budget process:

In September 2016, Mayor Hancock and City Council partnered to create **Denver’s first dedicated local fund for affordable housing**. The dedicated fund will generate an estimated **$150 million over 10 years** to serve low and moderate-income households. Revenue for the dedicated fund will come from a portion of existing property tax and a new, one-time “housing linkage fee” on commercial and residential development.
Denver can engage public, private and nonprofit partners to invest in opportunity-rich neighborhoods.

- The property tax component of the fund is stable and predictable, generating an estimated $7 million in 2018. This revenue will grow slowly and steadily over time.

- Revenue from the housing linkage fee will vary based on economic trends, bringing in more revenue during an economic upcycle and less revenue during an economic downturn. On average, the linkage fee is expected to generate $7-8 million annually.

Program income is also collected from historic investments where a private, quasi-public or nonprofit partner received an investment from OED and is paying that loan back over time. While program income is dependent on the number and type of investments made in each year, OED typically receives between $550,000 - $750,000 in program income from historic investments, primarily from federal funds.

**Detailed List of Denver’s Affordability Resources**

While housing is a core component of the City’s investments in promoting inclusive communities, addressing affordability takes more than just developing and preserving housing – it takes increasing access to higher paying wages, connecting residents to health and financial wellness and promoting equitable access to mobility opportunities. Combined, these investments across multiple agencies help work to maintain or expand affordability throughout Denver neighborhoods.
Several City agencies support programs that complement OED’s investments into housing development, preservation and programs. These agencies invest resources into expanding housing options or reducing housing costs, including:

- **Department of Human Services** invests federal resources such as Emergency Solutions Grants (ESG) and other local resources in direct rental assistance, rapid re-housing vouchers and shelter diversion strategies for residents experiencing homelessness. Additionally, the Department of Human Services oversees the City’s Senior and Disabled Property Tax Rebate program where low-income homeowners and renters can access an annual rebate to offset a portion of their property taxes.

- **Department of Finance** oversees use of Social Impact Bonds (SIB) to provide critical supportive services that primarily serve chronically homeless individuals in Denver. Additionally, the Department of Finance manages the City’s Metro Mortgage Assistance Plus program, which provides down payment assistance grants for qualified prospective homebuyers, and the Metro Mortgage Credit Certificate Program, which provides tax credits for a portion of the annual interest paid on a qualified homeowner’s mortgage loan.

- **Department of Human Rights and Community Partnerships** invests in a home weatherization program to help homeowners make upgrades to their home aimed at promoting energy efficiency.

- **Department of Public Health and Environment** invests in a program to help owners of residential properties that do not currently meet public health codes to bring their buildings into compliance with health and safety standards.

- **Department of Public Works** invests in expanding the city’s transit infrastructure in partnership with the Regional Transit District and the Colorado Department of Transportation through fixed-rail and high frequency bus networks, as well as first and last mile connections that support pedestrian and bike infrastructure throughout the city. In 2017, Denver released a “Mobility Action Plan” aimed at enhancing the city’s multi-modal connections with a focus on creating equity in the city’s transportation network.
Neighborhood Characteristics
As part of this plan, the City and its partners developed five neighborhood types informed by Enterprise Community Partners’ Opportunity360 platform to align place-based strategies and assets related to housing, health, economic mobility, transportation, and education throughout Denver. These neighborhood types were developed to set a foundation and ensure that housing production and preservation strategies address the unique characteristics and housing opportunities within specific neighborhoods.

The neighborhood types developed as part of this planning process set a foundation for how the City and its partners will begin to consider opportunity as part of housing investment decisions, but additional steps are needed to continue to analyze Denver neighborhoods according to their unique characteristics.

As part of the implementation of this plan and Denver’s upcoming Analysis of Impediments, the City and its partners should continue to conduct outreach with community members and housing stakeholders to refine how opportunity is defined for Denver residents and leaders.

Expand and Refine Existing Neighborhood Analysis with Additional Local Data.
In addition to the data collected as part of Housing an Inclusive Denver, the City and its partners should build upon the existing neighborhood characteristics to understand the location of physical assets within the neighborhood. These physical assets could include the location of high-performing schools, major hospitals and community health care facilities, and grocery stores.
Neighborhoods in **Type 1** offer the widest variety of culture and diversity in the Mile High City. Working families and individuals enjoy affordable, but older housing stock. However, both rents and home values have experienced sharp increases since 2015 and many residents within Type 1 are vulnerable to displacement. Opportunity can be more difficult to obtain in these neighborhoods since nine of Denver’s ten R/ECAP areas fall within this type.

To increase opportunity, strategies to preserve cultural diversity and affordability while increasing access to health, education and jobs will be deployed. For example:

- Preserving affordability of existing income-restricted properties
- Promoting programs that help households stay in their existing unsubsidized rental housing
- Promoting programs that help families maintain their existing homes
- Promoting development of new mixed-income housing stock
Walk, bike or ride your way through **Type 2** neighborhoods. These communities are generally closer to jobs and transit centers and about 1/3 of the City’s unsubsidized affordable properties are located here. Residents in type 2 neighborhoods are highly engaged in the labor market, but median income is lower than in other areas of the City. Rent is lower but home purchase prices are higher than the citywide average in Type 2.

For Type 2, strategies support maintaining affordable rents while encouraging more affordable for-purchase homes:

- Preserving existing affordable housing near transit (prioritizing existing income-restricted properties)
- Preserving affordability of existing unsubsidized affordable housing
- Promoting development of new affordable, mixed-income and mixed-use housing stock
- Promoting programs that help households in these neighborhoods access affordable for-sale housing throughout Denver
In **Type 3** neighborhoods, residents enjoy hip neighborhood restaurants and chic boutiques, new homes and classic Denver designs. Both rental and owner-ship housing tend to cost more than other areas of the city and residents generally exhibit better employment, health, and educational outcomes. Very few of these neighborhoods are considered vulnerable to displacement and a majority of publicly owned land that could be used for housing is within this type.

In Type 3, creation is key when it comes to affordable housing strategy:

- Leveraging publicly owned land for affordable housing development
- Promoting development of new affordable, mixed-income and mixed-use housing stock
- Promoting programs that help households access for-sale housing and affordable rental housing
In **Type 4** neighborhoods, unemployment is low and housing is more affordable. Relative to other types, these neighborhoods have the largest share of residents who are 65 years or older. The housing stock, particularly rental properties, tends to command lower prices and 1/3 of the City’s unsubsidized affordable properties are located within this type.

Strategies for Type 4 should focus on promoting overall quality and preserving affordability of existing housing and strengthening connections to health and employment opportunities:

- Preserving affordability of existing unsubsidized affordable housing
- Promoting programs that help households access affordable rental and for-sale housing
- Promoting programs that help households maintain their existing homes
- Preserving affordability of existing affordable rental housing near jobs/transit
In **Type 5**, the rental market is commanding higher rents than the citywide average compared to the homeownership market, the highest average rent of all neighborhood types. More units are overcrowded than in other areas of the City and the housing stock is much newer. About half of the neighborhoods in this type have been identified as vulnerable to displacement, but recent housing market trends show that average rent is decreasing in several of these areas. **The City should consider diversifying housing options in this type, in terms of stock, cost, and responsiveness to demographic changes.**

The following housing investment strategies would be particularly applicable in Type 5 neighborhoods:

- Promoting development of new affordable, mixed-income and mixed-use housing
- Preserving affordability of existing income-restricted properties
- Promoting programs that help households access affordable rental housing
- Promoting programs that help households stay in their existing rental housing
Appendices
## APPENDIX 1. SUPPORTING TABLES

Throughout the appendices, tables are labeled using the following convention: TABLE #.##, where the first number is the section of the plan that references the table and the second number is the order in which the table falls among all tables in that section. Figures and maps are labeled using the same convention in subsequent appendices.

### TABLE 1.1 | AVERAGE VALUES ON KEY INDICATORS FOR EACH NEIGHBORHOOD TYPE, COMPARED TO THE CITYWIDE AVERAGE

<table>
<thead>
<tr>
<th>Demographics</th>
<th>Type 1</th>
<th>Type 2</th>
<th>Type 3</th>
<th>Type 4</th>
<th>Type 5</th>
<th>Citywide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-white residents</td>
<td>77%</td>
<td>27%</td>
<td>23%</td>
<td>41%</td>
<td>78%</td>
<td>44%</td>
</tr>
<tr>
<td>Residents who are 65+ years old</td>
<td>9%</td>
<td>8%</td>
<td>13%</td>
<td>17%</td>
<td>6%</td>
<td>11%</td>
</tr>
<tr>
<td>Housing</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Median gross rent</td>
<td>$930</td>
<td>$948</td>
<td>$1,232</td>
<td>$880</td>
<td>$1,283</td>
<td>$1,019</td>
</tr>
<tr>
<td>Median home value</td>
<td>$168,620</td>
<td>$310,738</td>
<td>$393,047</td>
<td>$254,892</td>
<td>$169,810</td>
<td>$281,833</td>
</tr>
<tr>
<td>Owner units affordable to low-income households</td>
<td>44%</td>
<td>12%</td>
<td>8%</td>
<td>22%</td>
<td>43%</td>
<td>23%</td>
</tr>
<tr>
<td>Rental units affordable to extremely low-income households</td>
<td>74%</td>
<td>39%</td>
<td>31%</td>
<td>56%</td>
<td>30%</td>
<td>48%</td>
</tr>
<tr>
<td>Health</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adults who reported poor health</td>
<td>21%</td>
<td>15%</td>
<td>13%</td>
<td>18%</td>
<td>14%</td>
<td>16%</td>
</tr>
<tr>
<td>Adults who received a physical within the last year</td>
<td>58%</td>
<td>55%</td>
<td>61%</td>
<td>60%</td>
<td>58%</td>
<td>59%</td>
</tr>
<tr>
<td>Adults who reported having asthma</td>
<td>9%</td>
<td>9%</td>
<td>8%</td>
<td>9%</td>
<td>8%</td>
<td>9%</td>
</tr>
<tr>
<td>Adults who reported being obese</td>
<td>26%</td>
<td>24%</td>
<td>23%</td>
<td>25%</td>
<td>27%</td>
<td>24%</td>
</tr>
<tr>
<td>Jobs</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unemployment rate</td>
<td>12%</td>
<td>7%</td>
<td>5%</td>
<td>8%</td>
<td>9%</td>
<td>3%</td>
</tr>
<tr>
<td>Labor Market Engagement Index</td>
<td>23</td>
<td>79</td>
<td>87</td>
<td>66</td>
<td>47</td>
<td>63</td>
</tr>
<tr>
<td>Median household income</td>
<td>$35,916</td>
<td>$50,980</td>
<td>$82,096</td>
<td>$45,382</td>
<td>$56,707</td>
<td>$56,362</td>
</tr>
<tr>
<td>Transit</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transit access</td>
<td>49</td>
<td>60</td>
<td>47</td>
<td>45</td>
<td>33</td>
<td>49</td>
</tr>
<tr>
<td>Education</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percent of residents with less than a high school degree</td>
<td>35%</td>
<td>7%</td>
<td>5%</td>
<td>10%</td>
<td>25%</td>
<td>15%</td>
</tr>
</tbody>
</table>

Note: This table is a selection of indicators and does not include all data used to calculate the neighborhood typology.

### TABLE 2.1 | AVERAGE RENT BY SUBMARKET (Q4 2011-Q4 2016), DENVER, CO

<table>
<thead>
<tr>
<th>Market Area Totals</th>
<th>Efficiency</th>
<th>1 Bed</th>
<th>2 Bed/1 B</th>
<th>2 Bed/2 B</th>
<th>3 Bed</th>
<th>Other</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denver-Central/Capitol Hill</td>
<td>$1,065</td>
<td>$1,263</td>
<td>$1,583</td>
<td>$2,211</td>
<td>$2,669</td>
<td>$1,701</td>
<td>$1,380</td>
</tr>
<tr>
<td>Denver-Downtown</td>
<td>$1,285</td>
<td>$1,574</td>
<td>$1,734</td>
<td>$2,092</td>
<td>$2,978</td>
<td>$2,636</td>
<td>$1,699</td>
</tr>
<tr>
<td>Denver-East Central/Lowry</td>
<td>$1,029</td>
<td>$1,257</td>
<td>$1,338</td>
<td>$1,700</td>
<td>$1,913</td>
<td>$1,681</td>
<td>$1,417</td>
</tr>
<tr>
<td>Denver-Far SE</td>
<td>$996</td>
<td>$1,101</td>
<td>$1,176</td>
<td>$1,502</td>
<td>$1,646</td>
<td>$1,385</td>
<td>$1,213</td>
</tr>
<tr>
<td>Denver-N Central/City Park</td>
<td>$894</td>
<td>$1,425</td>
<td>$1,461</td>
<td>$2,208</td>
<td>$2,265</td>
<td></td>
<td>$1,627</td>
</tr>
<tr>
<td>Denver-Northeast</td>
<td>$1,012</td>
<td>$999</td>
<td>$1,030</td>
<td>$1,592</td>
<td>$1,491</td>
<td>$1,933</td>
<td>$1,199</td>
</tr>
<tr>
<td>Denver-Northwest</td>
<td>$1,371</td>
<td>$1,356</td>
<td>$1,378</td>
<td>$2,026</td>
<td>$1,483</td>
<td>$580</td>
<td>$1,473</td>
</tr>
<tr>
<td>Denver-S Central/Wash Park</td>
<td>$1,080</td>
<td>$1,284</td>
<td>$1,162</td>
<td>$1,911</td>
<td>$1,616</td>
<td>$756</td>
<td>$1,331</td>
</tr>
<tr>
<td>Denver-Southeast</td>
<td>$862</td>
<td>$1,060</td>
<td>$1,132</td>
<td>$1,433</td>
<td>$1,253</td>
<td>$1,123</td>
<td>$1,183</td>
</tr>
<tr>
<td>Denver-Southwest</td>
<td>$1,176</td>
<td>$1,396</td>
<td>$1,514</td>
<td>$1,823</td>
<td>$1,100</td>
<td>$1,338</td>
<td></td>
</tr>
<tr>
<td>Denver-West Central</td>
<td>$959</td>
<td>$1,132</td>
<td>$1,520</td>
<td>$1,089</td>
<td>$1,783</td>
<td>$2,405</td>
<td>$1,362</td>
</tr>
<tr>
<td><strong>Denver County Average</strong></td>
<td><strong>$1,140</strong></td>
<td><strong>$1,250</strong></td>
<td><strong>$1,287</strong></td>
<td><strong>$1,733</strong></td>
<td><strong>$1,803</strong></td>
<td><strong>$1,354</strong></td>
<td><strong>$1,376</strong></td>
</tr>
<tr>
<td><strong>Denver County Average / SF</strong></td>
<td><strong>$2.21</strong></td>
<td><strong>$1.75</strong></td>
<td><strong>$1.47</strong></td>
<td><strong>$1.55</strong></td>
<td><strong>$1.33</strong></td>
<td><strong>$1.69</strong></td>
<td><strong>$1.69</strong></td>
</tr>
</tbody>
</table>

Source: Denver Metro Apartment Vacancy and Rent Report 4Q 2016

### TABLE 2.2 | HOME FOR-SALE MARKET INDICATORS (2012-2016), DENVER, CO

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Detached</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Sales</td>
<td>8,694</td>
<td>9,748</td>
<td>8,690</td>
<td>8,381</td>
<td>8,593</td>
</tr>
<tr>
<td>Average Month's Inventory</td>
<td>5</td>
<td>5</td>
<td>3</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Average Days on Market</td>
<td>67</td>
<td>67</td>
<td>42</td>
<td>33</td>
<td>30</td>
</tr>
<tr>
<td>Average Sales Price (Dec)</td>
<td>$335,482</td>
<td>$351,449</td>
<td>$398,366</td>
<td>$435,857</td>
<td>$467,498</td>
</tr>
<tr>
<td>Median Sales Price (Dec)</td>
<td>$263,800</td>
<td>$268,000</td>
<td>$314,738</td>
<td>$350,000</td>
<td>$378,000</td>
</tr>
<tr>
<td><strong>Attached</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Sales</td>
<td>3,218</td>
<td>4,004</td>
<td>5,417</td>
<td>5,880</td>
<td>5,771</td>
</tr>
<tr>
<td>Average Month's Inventory</td>
<td>8</td>
<td>8</td>
<td>4</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Average Days on Market</td>
<td>91</td>
<td>91</td>
<td>58</td>
<td>44</td>
<td>45</td>
</tr>
<tr>
<td>Average Sales Price (Dec)</td>
<td>$234,938</td>
<td>$265,562</td>
<td>$314,105</td>
<td>$365,467</td>
<td>$378,193</td>
</tr>
<tr>
<td>Median Sales Price (Dec)</td>
<td>$153,250</td>
<td>$177,000</td>
<td>$238,500</td>
<td>$261,000</td>
<td>$300,940</td>
</tr>
</tbody>
</table>

Source: 2016 Denver Multiple Listing Service (MLS) System
### TABLE 3.1 | HOMELESSNESS INTERVENTIONS VERSUS PROJECTED NEED

<table>
<thead>
<tr>
<th></th>
<th>PSH</th>
<th>DPH</th>
<th>Diversion</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual Households</td>
<td>549</td>
<td>2,381</td>
<td>684</td>
<td>3,614</td>
</tr>
<tr>
<td>Family Households</td>
<td>444</td>
<td>272</td>
<td>107</td>
<td>823</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>658</td>
<td>2,921</td>
<td>858</td>
<td>4,437</td>
</tr>
</tbody>
</table>

Source: Corporation for Supportive Housing

### TABLE 6.1 | SHARE OF RENTERS AND OWNERS BY NEIGHBORHOOD TYPE

<table>
<thead>
<tr>
<th></th>
<th>Type 1</th>
<th>Type 2</th>
<th>Type 3</th>
<th>Type 4</th>
<th>Type 5</th>
<th>Citywide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent owners</td>
<td>46%</td>
<td>31%</td>
<td>66%</td>
<td>41%</td>
<td>67%</td>
<td>49%</td>
</tr>
<tr>
<td>Percent renters</td>
<td>54%</td>
<td>69%</td>
<td>34%</td>
<td>59%</td>
<td>33%</td>
<td>51%</td>
</tr>
</tbody>
</table>

Source: Census ACS 5-Year Estimates (2011-2015)
APPENDIX 2. SUPPORTING FIGURES

FIGURE 1.1 | RESPONSES TO “IS YOUR CURRENT HOUSING SITUATION AFFORDABLE?” (N = 955)

Source: Housing an Inclusive Denver online public survey

FIGURE 1.2 | RESPONSES TO “WHAT ARE THE MAIN REASONS THAT ARE CAUSING YOUR HOUSING SITUATION TO BE UNAFFORDABLE?” (N = 340)

Source: Housing an Inclusive Denver online public survey
FIGURE 1.3 | RESPONSES TO “HOW IMPORTANT WOULD IT BE TO LIVE IN A NEIGHBORHOOD WITH FAMILIES AND INDIVIDUALS AT DIFFERENT INCOME LEVELS?” (N = 949)

Source: Housing an Inclusive Denver online public survey

FIGURE 1.4 | RESPONSES TO “HOW IMPORTANT WOULD IT BE TO LIVE IN A NEIGHBORHOOD WITH FAMILIES AND INDIVIDUALS OF DIFFERENT RACES AND ETHNICITIES?” (N = 954)

Source: Housing an Inclusive Denver online public survey
FIGURE 1.5 | RESPONSES TO “HOW IMPORTANT WOULD IT BE TO LIVE IN A NEIGHBORHOOD WITH PEOPLE OF DIFFERENT AGES AND LIFESTYLES?” (N = 954)

Source: Housing an Inclusive Denver online public survey

FIGURE 1.6 | RESPONSES TO “HOW SHOULD THE CITY BALANCE PRESERVING AFFORDABILITY OF EXISTING HOUSING WITH BUILDING NEW AFFORDABLE HOUSING?” (N = 899)

Source: Housing an Inclusive Denver online public survey
FIGURE 1.7 | RESPONSES TO “HOW SHOULD THE CITY BALANCE INVESTMENTS TO MAINTAIN AFFORDABILITY IN ‘VULNERABLE NEIGHBORHOODS’ WITH INVESTMENTS TO EXPAND AFFORDABLE HOUSING IN NEIGHBORHOODS WITH LIMITED OPTIONS FOR LOW AND MODERATE-INCOME HOUSEHOLDS?” (N = 889)

- More resources to stabilize housing in vulnerable neighborhoods
- Slightly more resources to stabilize housing in vulnerable neighborhoods
- More resources to expand affordable housing in neighborhoods with limited options for low and moderate income families
- Slightly more resources to expand affordable housing in neighborhoods with limited options for low and moderate income families

Source: Housing an Inclusive Denver online public survey
FIGURE 1.8 | RESPONSES TO “I AM MOST CONCERNED THAT THE CITY AND COUNTY OF DENVER DOES NOT HAVE ENOUGH AFFORDABLE HOUSING FOR…” (N = 982)

Source: Housing an Inclusive Denver online public survey

FIGURE 1.9 | TOP RANKED RESPONSES FOR “HOW SHOULD THE CITY BALANCE INVESTMENTS IN HOUSING FOR A VARIETY OF INCOME LEVELS?” (N = 923)

Source: Housing an Inclusive Denver online public survey
FIGURE 1.10 | RESPONSES FOR “WHAT FACTORS ARE MOST IMPORTANT TO YOU WHEN CHOOSING YOUR HOME?”

<table>
<thead>
<tr>
<th>Factor</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monthly housing cost</td>
<td>807</td>
</tr>
<tr>
<td>Proximity to employment or job</td>
<td>534</td>
</tr>
<tr>
<td>Perception of neighborhood safety</td>
<td>480</td>
</tr>
<tr>
<td>Features of the house (such as size, age, number of bathrooms, etc.)</td>
<td>478</td>
</tr>
<tr>
<td>Proximity to parks, green space, or other natural resources</td>
<td>393</td>
</tr>
<tr>
<td>Walkability of neighborhood</td>
<td>391</td>
</tr>
<tr>
<td>Having shops and services within a short walk</td>
<td>357</td>
</tr>
<tr>
<td>Sense of community and neighborhood identity</td>
<td>303</td>
</tr>
<tr>
<td>Proximity to bus/transit stops</td>
<td>277</td>
</tr>
<tr>
<td>Reputation of public schools</td>
<td>199</td>
</tr>
<tr>
<td>Timing or availability of housing</td>
<td>175</td>
</tr>
<tr>
<td>Accessibility (for seniors and people with disabilities)</td>
<td>92</td>
</tr>
<tr>
<td>Landlord acceptance of Section 8 (Housing Choice)</td>
<td>58</td>
</tr>
</tbody>
</table>

Source: Housing an Inclusive Denver online public survey

FIGURE 2.1 | NUMBER OF COST-BURDENED HOUSEHOLDS (2015), DENVER, CO

Source: 2015 American Community Survey Public Use Microdata Sample
**FIGURE 2.2 | AVERAGE RENT, DENVER, CO (Q4 2011-Q4 2016)**

Source: Denver Metro Apartment Vacancy and Rent Report 4Q 2016

**FIGURE 2.3 | TOTAL AFFORDABLE & AVAILABLE RENTAL UNITS BY INCOME LEVEL (2015), DENVER, CO**

Source: 2015 American Community Survey Public Use Microdata Sample
FIGURE 2.4 | AVERAGE HOME SALE PRICE, DENVER, CO (2012-2016)

Source: Metro Denver Board of Realtors, 2012-2016.
APPENDIX 3. SUPPORTING MAPS

MAP 1.1 | DENVER NEIGHBORHOOD OPPORTUNITY TYPOLOGY

Source: See Appendix 5 for all data sources included in the neighborhood opportunity typology.
Note: Tracts exhibiting the highest change in assessed value experienced an increase of more than 51 percent, while Tracts exhibiting the highest change in assessed value experienced an increase of 9 percent or less.

Source: See Appendix 5 for all data sources included in the neighborhood opportunity typology
MAP 2.2 | RECENT CHANGE IN RENT BY SUBMARKET (Q1 2015 TO Q4 2016) RELATIVE TO NEIGHBORHOOD TYPES

Source: Denver Metro Rent and Vacancy Report from Q1 2015 and Q4 2016
MAP 2.3 | RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY AREAS RELATIVE TO NEIGHBORHOOD TYPES

Source: HUD AFFH Data and Mapping Tool
MAP 2.4 | UNSUBSIDIZED PROPERTIES WITH AVERAGE RENTS AT OR BELOW FAIR MARKET RENT RELATIVE TO NEIGHBORHOOD TYPES

Source: Apartment Insights
MAP 2.5 | AREAS VULNERABLE TO DISPLACEMENT RELATIVE TO NEIGHBORHOOD TYPES

Source: City and County of Denver, Office of Economic Development
MAP 2.6 | NEIGHBORHOOD TYPE 1

Source: See Appendix 5 for all data sources included in the neighborhood opportunity typology
MAP 2.7 | NEIGHBORHOOD TYPE 2

Source: See Appendix 5 for all data sources included in the neighborhood opportunity typology
Source: See Appendix 5 for all data sources included in the neighborhood opportunity typology
Source: See Appendix 5 for all data sources included in the neighborhood opportunity typology
MAP 2.10 | NEIGHBORHOOD TYPE 5

Source: See Appendix 5 for all data sources included in the neighborhood opportunity typology
MAP 7.1 | EXISTING INCOME-RESTRICTIVE PROPERTIES & NEIGHBORHOOD TYPES

Source: Denver Office of Economic Development Income-Restricted Database (May 2017), Housing Preservation Network (2017)
MAP 7.2 | EXPIRING UNITS & NEIGHBORHOOD TYPES

Source: Denver Office of Economic Development Income-Restricted Database (May 2017), Housing Preservation Network (2017)
Source: Denver Office of Economic Development Income-Restricted Database (May 2017), Housing Preservation Network (2017)
APPENDIX 4. NEIGHBORHOOD OPPORTUNITY TYPOLOGY
METHODS & DATA SOURCES

In performing this analysis, we operated under the following definition of opportunity: a situation that places residents able to reach their highest potential. In this situation, residents can lead healthy lives, be secure in their homes, and are connected to good jobs, quality education and community services. From this definition, we identified five key opportunity outcomes: housing quality and security, education, health & wellness, economic mobility & security, and transit & connections.

We constructed a typology of Denver Census Tracts by performing a cluster analysis on 48 Tract-level variables that reflect those five opportunity outcomes. These data were collected from various federal sources such as the U.S. Census American Community Survey and the Environmental Protection Agency’s “Smart Location Database” in addition to some proprietary data from national vendors, including Walkscore and Location Inc. A full list of the data included in this analysis and their sources are provided below.

From these data, the cluster analysis identified neighborhoods that share similar values along the various opportunity outcomes. Similar neighborhoods are then categorized into the same group representing a single neighborhood “type.” In Denver, we identified five distinct neighborhood types. These types are not ordinal—there is no inherent hierarchy of one neighborhood type over another—but rather reflect different conditions of opportunity throughout the city.

OPPORTUNITY TYPOLOGY DATA SOURCES

<table>
<thead>
<tr>
<th>Variable</th>
<th>Source</th>
<th>Indicator Definition</th>
<th>Data Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent of Residents who are Non-White</td>
<td>Census ACS 5-Year</td>
<td>Percent of the Population that is Non-White and/or Hispanic/Latino</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Population that is 65 years or Greater</td>
<td>Census ACS 5-Year</td>
<td>Percent of the Population That is age 65 or older.</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Racial Diversity Index</td>
<td>Census ACS 5-Year</td>
<td>Probability that two Individuals Chosen at Random Would Be of Different Races or Ethnicities</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of the Population that has One or More Disabilities</td>
<td>Census ACS 5-Year</td>
<td>Percent of the Population that has One or More Disabilities</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of the Population that is Non-English Speaking</td>
<td>Census ACS 5-Year</td>
<td>Percent of the population (age 5 and older) speaking English less than &quot;very well&quot;</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Civilians Age 18 Who Are Veterans</td>
<td>Census ACS 5-Year</td>
<td>Percent of Civilians Age 18 Who Are Veterans</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Poverty Rate</td>
<td>Census ACS 5-Year</td>
<td>Poverty rate among individuals for whom poverty status is determined</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Unemployment Rate</td>
<td>Census ACS 5-Year</td>
<td>The unemployment rate represents the number of unemployed people age 16 and older as a percent of people in the civilian labor force.</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Variable</td>
<td>Source</td>
<td>Indicator Definition</td>
<td>Data Year</td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Total Crime Index</td>
<td>Location Inc.</td>
<td>Index of crime risk based on rank percent of total crime rate per 1,000 residents, where 50 = safer than 50% of locations in U.S. and 0 is safest</td>
<td>2016</td>
</tr>
<tr>
<td>Violent Crime Index</td>
<td>Location Inc.</td>
<td>Index of crime risk based on rank percent of violent crime rate per 1,000 residents, where 50 = safer than 50% of locations in U.S. and 0 is safest</td>
<td>2016</td>
</tr>
<tr>
<td>HUD Labor Market Engagement Index</td>
<td>U.S. Department of Housing and Urban Development</td>
<td>This index provides an indication of the relative intensity of labor market engagement and human capital in a neighborhood. It is based upon the level of employment, labor force participation and educational attainment in a census tract. Values are percentile ranked nationally and range from 0 to 100, with higher scores representing greater labor force participation and human capital in a neighborhood.</td>
<td>2015</td>
</tr>
<tr>
<td>Percent Free and Reduced Lunch Recipients</td>
<td>Common Core of Data, National Center for Educational Statistics (NCES)</td>
<td>Percent of Students That were Free and Reduced Lunch Recipients in the 2012-2013 school year</td>
<td>2012-2013</td>
</tr>
<tr>
<td>Percent of Residents with a Bachelor’s Degree or Higher</td>
<td>Census ACS 5-Year</td>
<td>Percent of population 25 years and older with a Bachelor’s degree or higher level of educational attainment</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Residents with a High School Diploma or Higher</td>
<td>Census ACS 5-Year</td>
<td>Percent of population 25 years and older with a High School Diploma or higher level of educational attainment</td>
<td>2010-2014</td>
</tr>
<tr>
<td>School Quality Score</td>
<td>Location Inc.</td>
<td>Standardized test score rank percentile in the nation. 100 is best</td>
<td>2016</td>
</tr>
<tr>
<td>Percent of Residents with less than a High School Diploma</td>
<td>Census ACS 5-Year</td>
<td>Percent of population 25 years and older with less than a High School Diploma level of educational attainment</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Adults Reporting to Have Asthma</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated percent of adults reporting to have asthma in 2013</td>
<td>2013</td>
</tr>
<tr>
<td>Percent of Adults Reporting to Have COPD</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated percent of adults ever diagnosed with chronic obstructive pulmonary disease, emphysema, or chronic bronchitis in 2013.</td>
<td>2013</td>
</tr>
<tr>
<td>Percent of Adults Reporting to be Obese</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated percent of adults reporting to be obese (a body mass index of 30 or greater) in 2013.</td>
<td>2013</td>
</tr>
<tr>
<td>Variable</td>
<td>Source</td>
<td>Indicator Definition</td>
<td>Data Year</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Percent of Adults Rating their Health as Poor</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated percent of adults reporting fair or poor health in the past 30 days</td>
<td>2013</td>
</tr>
<tr>
<td>Percent of Adults Reporting a Physical Checkup in the Past Year in this Tract</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated Percent of Adults Reporting a Physical Checkup in the Past Year in this Tract</td>
<td>2013</td>
</tr>
<tr>
<td>Percent of Adults Reporting to Have a Personal Doctor or Health Care Provider in this Tract</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated Percent of Adults Reporting to Have a Personal Doctor or Health Care Provider in this Tract</td>
<td>2013</td>
</tr>
<tr>
<td>Percent of Adults Reporting to Engage in Heavy Drinking (2013), Tract</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated Percent of Adults Reporting to Engage in Heavy Drinking (2013), Tract</td>
<td>2013</td>
</tr>
<tr>
<td>Estimated percent of adults reporting to eat less than 1 serving of fruit/vegetables per day in 2013</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated percent of adults reporting to eat less than 1 serving of fruit/vegetables per day in 2013</td>
<td>2013</td>
</tr>
<tr>
<td>Estimated percent of adults reporting to smoke cigarettes regularly in 2013</td>
<td>CDC Behavioral Risk Factor Surveillance System survey &amp; PolicyMap</td>
<td>Estimated percent of adults reporting to smoke cigarettes regularly in 2013</td>
<td>2013</td>
</tr>
<tr>
<td>HUD Environmental Health Index</td>
<td>U.S. Department of Housing and Urban Development</td>
<td>This index summarizes potential exposure to harmful toxins at a neighborhood level. Values are inverted and percentile ranked nationally. The values range from 0 to 100, with the higher index values suggesting less exposure to toxins harmful to human health and, thus, better environmental quality in an area. HUD created this index using 2005 National Air Toxics Assessment data.</td>
<td>2015</td>
</tr>
<tr>
<td>Median Gross Rent</td>
<td>Census ACS 5-Year</td>
<td>Median Gross Rent</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Median Home Value</td>
<td>Census ACS 5-Year</td>
<td>Median Home Value</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>Census ACS 5-Year</td>
<td>Median Household Income</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Share of Owner Units that are Affordable at 80% of Area Median Income</td>
<td>HUD Location Affordability Index</td>
<td>Percent of all homes that are likely affordable for a 4-person family earning 80% of AMI in 2013</td>
<td>2013</td>
</tr>
<tr>
<td>Share of Rental Units that are Affordable at 50% of Area Median Income</td>
<td>HUD Location Affordability Index</td>
<td>Percent of two-bedroom renter-occupied housing units that are affordable to a 4-person family earning 50% of Area Median Income in 2013</td>
<td>2013</td>
</tr>
<tr>
<td>Percent of All Low-Income Households that are Extremely Cost Burdened</td>
<td>HUD - CHAS data</td>
<td>Percent of All Low-Income Households (those earning less than 80% of AMI) that are Extremely Cost Burdened (paying 50% or more of their income for housing expenses)</td>
<td>2012</td>
</tr>
<tr>
<td>Variable</td>
<td>Source</td>
<td>Indicator Definition</td>
<td>Data Year</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Median Year Built</td>
<td>Census ACS 5-Year</td>
<td></td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Housing Units in Buildings with Three or More Units</td>
<td>Census ACS 5-Year</td>
<td></td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Households with Children</td>
<td>Decennial Census</td>
<td>Percent of Households with Children</td>
<td>2010</td>
</tr>
<tr>
<td>Percent of Households that have Multiple Families or Unrelated Individuals</td>
<td>Enterprise/Census ACS 5 Year</td>
<td>Percent of Households that have Multiple Families or Unrelated Individuals</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Households Residing in Boats, Mobile Homes or RV's</td>
<td>Census ACS 5-Year</td>
<td></td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Renter Households Receiving Project Based Housing Choice Vouchers (2015), Tract</td>
<td>HUD - Picture of Subsidized Households</td>
<td>Percent of Renter Households Receiving Housing Choice Vouchers (2015), Tract</td>
<td>2015</td>
</tr>
<tr>
<td>Percent of Occupied Units that are Crowded or Overcrowded</td>
<td>Enterprise/Census ACS 5 Year</td>
<td>Percent of Occupied Housing Units that have more than one person per room living there</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Estimated Percent of Income Spent on Housing and Transportation Costs by a Single Parent Family Household</td>
<td>HUD Location Affordability Index</td>
<td>Estimated Percent of Income Spent on Housing and Transportation Costs by a Single Parent Family Household</td>
<td>2013</td>
</tr>
<tr>
<td>Estimated Percent of Income Spent on Housing and Transportation Costs by a Working Individual Household</td>
<td>HUD Location Affordability Index</td>
<td>Estimated Percent of Income Spent on Housing and Transportation Costs by a Working Individual Household</td>
<td>2013</td>
</tr>
<tr>
<td>Transit Score</td>
<td>Walk Score</td>
<td>Transit Accessibility Ranking</td>
<td>2016</td>
</tr>
<tr>
<td>Walkscore</td>
<td>Walk Score</td>
<td>Walk Score Index of Location Walkability</td>
<td>2016</td>
</tr>
<tr>
<td>Average Travel Time to Work</td>
<td>Census ACS 5-Year</td>
<td>Average Travel Time to Work</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Households for Which no Vehicles are Available</td>
<td>Census ACS 5-Year</td>
<td>Percent of Households for Which no Vehicles are Available</td>
<td>2010-2014</td>
</tr>
<tr>
<td>Percent of Workers Who Commuted to Work Using Public Transit</td>
<td>Census ACS 5-Year</td>
<td>Percent of Workers Who Commuted to Work Using Public Transit</td>
<td>2010-2014</td>
</tr>
</tbody>
</table>
APPENDIX 5. DEMOGRAPHIC FORECASTING METHODS

The Colorado Department of Local Affairs Demographic Estimates and Forecasts
The Colorado Department of Local Affairs created forecasts of population and household characteristics using multiple data sources. The overall set of population projections is produced in a series of stages which are carried out at the state, then region, and then county levels.

First, a draft state level economic forecast is prepared using a Center for Business and Economic Forecasting (CBEF) model of labor force demand. The model provides a forecast of employment (by industrial division at the state level only), employed persons, unemployed persons, persons in the labor force (demanded by the economy), and personal income. The model also forecasts approximate levels of net migration and population which are used internally to forecast activities in the construction and consumer service sectors of the economy.

The model is compared to a second forecast created by using U.S. Census civilian population data, projected age, and sex-specific labor force needs. The two estimates (one from using CBEF and one using U.S. Census) are compared and adjustments are made to create the final population forecasts by age and sex for the state, which are then used along with regional and economic forecasts and net migration forecasts to create regional and county population forecasts.

DOLA prepares household forecasts in three stages: First, household population was projected as the residual between the SDO’s projections of total population minus projections of group quarters population. Second, household projections were then derived by applying age-gender specific (Under 24, 25-44, 45-64, 65+) householder proportions to the age-gender specific projections of household population. Third and finally, children, adults and elderly dependent non-householders were distributed into the households on the basis of sub-state region specific person per household rations (<17, 18-64, 65+). These projections are available by county and by age of householder.
APPENDIX 6: OVERVIEW OF FEEDBACK RECEIVED THROUGH 45-DAY PUBLIC COMMENT PERIOD

During the 45-day comment period, the City received over a hundred survey responses, several letters from individuals, organizations, and coalitions, and comments from residents and business owners who attended one of three neighborhood meetings. The most common topics throughout the public comments, questions and concerns were: securing additional resources, land trusts, gentrification, resources for addressing homelessness, and eviction and displacement. The feedback received during the public comment period was incorporated as changes to Housing an Inclusive Denver or addressed in a supplemental FAQ.

I. Sources of feedback on Housing an Inclusive Denver:
   • Neighborhood meetings in Southwest, Southeast, and Central Denver with 50+ attendees
   • Public survey conducted in English and Spanish: 118 English responses, 0 Spanish
     ○ How well do you think the housing plan aligns with the city’s housing challenges?
       • 4%: Perfectly aligned
       • 42%: Mostly aligned
       • 9%: Neutral
       • 30%: Slightly aligned
       • 15%: Not at all aligned
     • Stakeholder letters received from individual organizations and associations/coalitions

II. Major themes from feedback during the public comment period:
   • City should pursue additional funding for housing investments
     ○ City should remove sunset on current affordable housing fund
     ○ City should pursue a housing bond to provide additional resources for housing upfront
   • City should pursue land trusts immediately as a tool to address displacement, preservation and long-term affordability
• Housing plan should focus even more on serving the lowest income residents earning below 30% AMI and those experiencing homelessness, especially seniors and people with disabilities
  ○ City should pursue creative strategies to address housing for these populations, such as through vouchers and homesharing programs

• Housing plan should include more specificity about funding for supportive services

III. Other feedback or questions received during the public comment period:
• Elements of the housing plan that are best aligned with the city’s challenges:
  a. Addresses issues of eviction and displacement
  b. Focuses on ways to increase housing diversity and incorporates the entire income spectrum
  c. Targets individuals and families with the lowest incomes

• Housing plan should focus even more on renter protections
  ○ Question: Why can’t the City pursue a rent control policy?
  ○ Question: Can the City pursue a policy that limits background checks and application fees paid to landlords?

• The City should pursue a more regional approach to housing

• Housing plan should focus on longer term affordability across all housing investments
  ○ Question: Why can’t Denver pursue housing that is affordable in perpetuity?
  ○ Question: Why does preservation sometimes require more funding from the City compared to new construction of affordable housing?
  ○ Questions: What tools are in the City’s toolbox to address gentrification?

• Housing plan should more specifically address the current gaps in federal funding
  ○ Question: What programs outlined in the Housing Plan are federally vs. locally funded?
  ○ Question: How much would it cost to create or preserve the “gap” in affordable units for low and moderate-income households in Denver?

• City should pursue more tools to incentivize development and preservation of affordable housing, such as expedited review of housing projects

• Housing Plan should address the need for legal representation for renters facing an eviction

• Housing plan should include more specificity about funding for supportive services
• Housing Plan should also include broader goals that are market based, such as:
  ○ Reverse, freeze or slow the worsening of the housing crisis by measuring the impact city investments have on the number of cost-burdened households in Denver

• Housing Plan should use language that is more reflective of the people we are trying to serve through investments rather than jargon -i.e. “homes” instead of “units” and populations in an income bracket rather using AMI

• City should explore some specific programs not currently addressed in the Housing Plan, such as:
  ○ Making Individual Development Accounts (IDAs) more accessible to low income residents
  ○ Legal representation for renters facing an eviction
  ○ Home sharing programs to help match residents looking for affordable housing with those who are currently overhoused
1. Based on the 2017 Point-In-Time (PIT) count for the County of Denver.
4. The rental supply gap was calculated using data from the American Community Survey Public Use Micro-sample 2015 One-Year Estimate. A unit is considered “affordable” if a household at given income level can afford the rent without being “cost-burdened” (or exceeding the U.S. Department of Housing and Urban Development’s 30% affordability standard). A unit is considered “available” at a given level of income if it is both affordable at that level and occupied by a renter at that income level or a lower income level or is vacant. These estimates are inclusive of lower income levels and units. This estimate does not account for persons experiencing homelessness, which would increase the overall need.
5. Higher vacancy rates at new units may contribute the City’s increased vacancy rate: Units built in 2010 or later had a vacancy rate of 15% while units constructed in 1979 or earlier had a vacancy rate of less than 5%.
6. Nine properties offer average rents at or below Fair Market Rents for a studio; 39 properties for a one-bedroom; and 82 properties for a two-bedroom.
7. These properties were identified using property-level data from Apartment Insights, a real-estate database that tracks financial and condition characteristics at properties with 50+ units. The analysis identified unsubsidized properties that offer average rents per unit at or below the following Fair Market Rents: studio: $844; one-bedroom: $1,031; and two-bedroom: $1,305. Fair Market Rents were based on FY17 Fair Market Rents via HUD User (www.huduser.gov/portal/datasets/fmr.html).
9. Between 2010 and 2017, growth in low-income households outpaced growth in low-income renter households. Extremely low-income owners increased by 172%; very low-income owners by 80%; and low-income owners by 47%. However, projections suggest that this trend will not continue over the next five years with Denver losing low-income owners between 2017 and 2021. Projections based on 2017 estimates from the Colorado Department of Local Affairs (DOLA). A full explanation of how DOLA creates these estimates can be found in Appendix 6.
10. American Community Survey Public Use Microsample Data 2015 One-Year Estimate.
11. The median assessed value of residential property as recently as 2011 was largely stagnant, increasing 1% between 2011 and 2013. Beginning in 2013, assessed values of residential property significantly increased. The City’s median assessed value increased by 30% between 2013 and 2015 and 26% between 2015 and 2017.
14. A preliminary inventory of publicly owned land suggests that the City-County of Denver controls the most land among other public entities, namely the Denver Housing Authority, Denver Public Schools, and Regional Transit District. Most publicly owned property is located within Neighborhood Type 3, with much of this land in these areas owned by the City-County of Denver. This inventory used property records from the City of Denver’s Office of the Assessor to identify parcels with the following characteristics: 1) owned by either the City-County of Denver, Denver Housing Authority, Denver Public Schools, or Regional Transit District; 2) zoned for residential development (excepting land zoned for airport uses); 3) parcel size of at least 2,500 square feet; and 4) vacant or “underused” parcels where the land value exceeded the improvement value. This analysis is intended to act as a preliminary baseline for the City to refine and update over time. A more detailed review by City staff with local knowledge of recent development and real-world conditions will likely yield omissions, including parcels that have been redeveloped or located within the right-of-way. City staff plans to further refine this dataset as it considers the best ways to leverage publicly owned property for affordable housing.
15. Based on the 2017 Point-In-Time (PIT) count for the County of Denver.

