



El Paso County, Colorado

Assessment of Fair Housing Plan

A comprehensive regional fair housing analysis to support the Community Development Block Grant Program administration for the 2022-2026 program years

Prepared by: El Paso County, Colorado
Economic Development Staff

Assessment of Fair Housing Tool

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I. Cover Sheet

1. Submission date:
2. Submitter name: El Paso County, Colorado
3. Type of submission (*e.g.*, single program participant, joint submission): Single Program Participant
4. Type of program participant(s) (*e.g.*, consolidated plan participant, PHA): Consolidated Plan Participant
5. For PHAs, Jurisdiction in which the program participant is located: N/A
6. Submitter members (if applicable):
7. Sole or lead submitter contact information:
 - a. Name: Crystal LaTier
 - b. Title: Economic Development Executive Director
 - c. Department: Economic Development Department
 - d. Street address: 9 East Vermijo
 - e. City: Colorado Springs
 - f. State: Colorado
 - g. Zip code: 80903
8. Period covered by this assessment: PY2022-PY2026
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature) (date)

12. Departmental acceptance or non-acceptance:

(Signature) (date)

Comments

DRAFT

II. Executive Summary

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

El Paso County, per the Colorado state demographer's 2020 data, is the most populous county in Colorado with an estimate of 730,395 people spread out over 2,000 square miles with an increasingly diverse demographic. To maintain and continue nurturing a region with no significant residential segregation patterns, the County endeavors to ensure an environment where equal access to housing opportunities is treated as an essential right.

Housing is an essential human need. The ability to find and obtain housing which best suits an individual's or family's needs can make a major difference in one's ability to access opportunities and can also affect and influence personal, educational, employment and other goals. Because housing choice is so critical, El Paso County is committed to ensuring that to the extent possible all current and prospective residents have full and equal access to a broad range of housing options.

Equal access to housing for all is a fundamental right protected by both state and federal laws. In recognition of fair housing as an important housing goal for the region, El Paso County has, in collaboration with various community organizations, completed an Assessment of Fair Housing (AFH) in order to affirmatively further fair housing efforts. This fair housing planning effort is also a federal requirement of the U.S. Department of Housing and Urban Development (HUD) as a part of the County's Community Development Block Grant (CDBG) Program.

The term 'fair housing' dates back to the 1960's and was derived from a political movement to outlaw discrimination in the rental or purchase of homes. This also included a broad range of other housing-related transactions, such as advertising, mortgage lending, homeowner's insurance, and zoning. Later, the same fair housing language was used in laws. At the urging of President Lyndon B. Johnson, Congress passed the federal Fair Housing Act (Title VIII of the Civil Rights Act) in April 1968.

The Fair Housing Act introduced several meaningful federal enforcement mechanisms. The Act prohibited:

- Refusal to sell or rent a dwelling to any person because of race, color, religion, or national origin.
- Discrimination based on race, color, religion, or national origin in the terms, conditions or privilege of the sale or rental of a dwelling.
- Advertising the sale or rental of a dwelling indicating preference of discrimination based on race, color, religion, or national origin.
- Coercing, threatening, intimidating, or interfering with a person's enjoyment or exercise of housing rights based on discriminatory reasons or retaliating against a person or organization that aids or encourages the exercise or enjoyment of fair housing rights.

When the Fair Housing Act was first enacted, it prohibited discrimination only on the basis of race, color, religion, and national origin. In 1974, sex was added to the list of protected classes, and in 1988, disability and familial status were also included. HUD is the cabinet agency with the statutory authority to administer and enforce the Fair Housing Act. The State of Colorado also added creed and ancestry as protected classes at the state level.

Based on state and federal law, throughout this report fair housing is defined as:

A condition in which individuals of similar income levels in the same housing market having a like range of housing choices available to them regardless of disability, race, creed, color, sex, sexual orientation, marital status, familial status, religion, national origin, or ancestry.

El Paso County's Economic Development Department (ED) is the lead agency for this AFH update. It oversees the preparation and implementation of this strategic planning document, which has been funded with administrative CDBG funds.

El Paso County's approach to the AFH in 2016 was based on a variety of sources and was modeled from the methodologies recommended in HUD's Affirmatively Furthering Fair Housing (AFFH) Rule and the Assessment of Fair Housing (AFH) Tool. The County relied on both primary and secondary data sources to complete this AFH. Sources of specific information are identified in the text below. Please also reference the complete list of sources in the Supporting Documents section of the AFH final document.

On December 1, 2016, HUD notified El Paso County of the acceptance of the AFH. Since the acceptance of the AFH, a number of policy changes at HUD has resulted in the removal of the AFH as a requirement of the program. However, this change did not remove our County's legal requirement to continue affirmatively furthering fair housing.

To demonstrate our program's commitment to fair housing law and creating a safe, equitable community for all, we have undertaken an update to our 2016 AFH document. This 2021 update to the AFH will serve as a cornerstone in the development of our 2022-2026 Consolidated Plan and inform strategies and best practices the County should undertake to continue improving access to opportunities for all County residents.

For ease of understanding, throughout this document, Urban County is defined as the Urban County CDBG jurisdiction which excludes the City of Colorado Springs. When the region is discussed, the entirety of El Paso County including the City of Colorado Springs is being referenced. In some cases, this may also refer to portions of Teller County, which according to the Census Bureau is part of the Colorado Springs Metropolitan Statistical Area (MSA).

2016 Primary and Secondary Data Sources:

- *HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool.*
- *Regional Affordable Housing Needs Assessment* - this assessment was developed in conjunction with the City of Colorado Springs. The 2012 American Community Survey (ACS) data was calculated and assessed by consultants Mullin & Lonergan Associates.

The assessment identifies key areas of concern and recommendations related to affordable housing within the region (Here after referred to as Regional Housing Assessment).

- *Affordable and Accessible Housing Needs and Barriers* - this document was developed by The Independence Center utilizing a qualitative process and focus groups made up of multiple residents and local agencies. The document outlines the needs of special populations in relation to housing (Here after referred to as the IC Study).
- *Census Data* - multiple year census and ACS data retrieved from census.gov.
- *El Paso County sponsored Public Meetings and Consults* - public meetings and small group consultations held to educate and receive public input about the Affirmatively Furthering Fair Housing (AFFH) Rule and the Assessment of Fair Housing (AFH) Tool.
- *El Paso County Assessment of Fair Housing Survey* - community survey that enabled El Paso County CDBG staff to receive public input about fair housing issues within the region.
- *Pikes Peak Area of Council of Governments (PPACG)- FY 2017-2021 Transportation Improvement Program Plan*
- *Colorado Springs Metro Transit Map & Data* - information about current available public transportation.
- *Fountain Municipal Transit Map & Data* - information about current available public transportation.
- *El Paso County School Districts Map & Data* - information about current school data and boundaries.
- *Colorado Department of Public Health and Environment (CDPHE) PFC Report & Maps* - information regarding the southeast El Paso County perfluorinated chemicals preliminary assessment of cancer and birth outcomes.
- *Fort Carson 25-Year Sustainability Goal Plan & other related news articles* - long term goals set to improve air quality on Fort Carson.
- *Colorado Housing and Finance Authority* - Low Income Housing Tax Credit Map & Data.
- *Department of Regulatory Agencies/Colorado Civil Rights Division* - List of Fair Housing Complaints filed by El Paso County residents.
- *U.S. Department of Housing and Urban Development/Fair Housing and Equal Opportunity* - List of Fair Housing Complaints filed by El Paso County residents.

2021 Primary and Secondary Data Sources:

- *HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool*
- *1990-2019 Census Data and Census Mapping Tools*
- *Department of Regulatory Agencies/Colorado Civil Rights Division*
- *National Low Income Housing Congressional District Profiles*
- *HUD Comprehensive Housing Market Analysis, 2006 and 2018*
- *The Independence Center 2019 Annual Report*

The Assessment of Fair Housing (AFH) process undertaken by El Paso County included:

Assessment: assessing past goals, strategies and actions relating to the El Paso County Analysis of Impediments which was adopted in 2010, and the 2016 AFH document that was accepted by HUD in December 2016

Analyzing: collecting data (through reliable and credible federal, state, and local sources) and public input (through the community efforts and local agency collaboration and partnerships) to analyze fair housing issues and identify significant contributing factors

Prioritizing: review and prioritization of present statistically significant contributing factors which affect fair housing in the region

Goal setting: El Paso County set housing priorities and goals to address current statistically significant fair housing issues and contributing factors

Consultation: meeting with regional stakeholders, to include PHAs, nonprofits, local municipalities, minority/marginalized community agencies, and the Continuum of Care. These consultations help our program analyze the goals and priorities mentioned above, to better understand the service ecosystem of the region.

Coordination: El Paso County plans to coordinate and incorporate the priorities and goals into strategies and actions included in the 2022-2026 Consolidated Plan and subsequent Annual Action Plans

The process noted above resulted in El Paso County identifying fair housing issues and contributing factors which will be addressed within four goals. These goals will ensure that meaningful action is undertaken to affirmatively further fair housing in the region.

After analyzing all primary and secondary data sources, El Paso County ED identified four recurring and prevalent fair housing issues:

Fair Housing Issue #1: There is a lack of affordable, accessible transportation which limits access to opportunities and housing choices and disproportionately affects persons with disabilities. Prioritized factors that contribute to this issue are:

- #1: The availability, type, frequency, and reliability of public transportation: The region is lacking robust public transportation infrastructure. Only two of the eight municipalities within the region have a public transit system. Those systems lack connections and a schedule that allows for residents to have access to opportunities.
- #2: Access to transportation for persons with disabilities: There is inadequate public infrastructure which would allow persons with disabilities to safely access public transit, jobs, housing, medical services, schools, and leisure activities.
- #3: Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure: There is inadequate public infrastructure which would allow persons of all protected classes to safely access public transit, jobs, housing, medical services, schools, and leisure activities
- #4: Lack of regional cooperation: There are inadequate connections between municipally operated public transit systems. While there is an agency- Pikes Peak Area Council of

Governments (PPACG) that coordinates a regional transportation improvement program, the entire Urban County jurisdiction does not participate in the program. However, the PPACG efforts provide a solid foundation when looking to increase regional cooperation on transportation issues. Furthermore, El Paso County applauds the PPACG goal to ensure transportation system investment benefits are equitably distributed to minorities, and citizens with disabilities, low incomes and/or other needs. These efforts continue to affirmatively further fair housing within the region.

This issue will be addressed by improving access to transportation services and infrastructure, removing impediments to mobility, and increasing access to opportunities. This can be done by increasing additional public transportation options, as well as improving infrastructure throughout a variety of areas within the county which will allow for more multimodal access to additional opportunities.

2021 Update to Fair Housing Issue #1: Thanks in part to El Paso County CDBG efforts over the past five years, four of the eight municipalities now have access to reliable public transit options, with intermittent transportation access offered at seven out of eight. Connectivity has improved in recent years thanks to coordination between municipalities and regional stakeholders advocating to improvements.

Multimodal transit is now realistic in several corridors within El Paso County, including Fontaine Blvd, the Southmoor neighborhood, and along Galley Road. All locations mentioned have CDBG investment, nearby bus stops, and low to moderate income neighborhoods. These new infrastructure improvements enable neighborhood residents to engage in activities like biking to a bus stop, safely walking to nearby amenities, or traveling with their assistive device along ADA compliant walkways.

That being said, there is a significant backlog of areas that continue to need investments such as the examples above. Public transit is also still in need of community investment within certain pockets of the County and expanded transportation services are still a commonly requested priority from community stakeholders. This issue will continue to remain a priority of the program.

Fair Housing Issue #2: A county-wide shortage of affordable, accessible housing units which limits access to opportunities and housing choices and disproportionately affects classes protected by fair housing law. Contributing factors are:

- #1: Location and type of affordable housing: There are substantial waitlists for all publicly supported housing. Additionally, El Paso County could benefit from more housing choices throughout the jurisdiction.
- #2: The availability of affordable units in a range of sizes: Due to changing demographics, there is increased need for smaller, affordable housing units in a variety of locations.
- #3: Impediments to mobility: Inability to move to a neighborhood or area of choice, due to lack of available, accessible, affordable units. A shortage of units and Housing Choice Vouchers limits mobility.

- #4: Location of accessible housing: Due to a shortage of accessible housing, choices are limited for persons with disabilities.
- #5: Location of employers: Areas of the County have low job proximity due to the overall size and geographic nature of the region.
- #6: Location of proficient schools and school assignment policies: Proficient schools are disproportionately concentrated in the north and west regions of the County.
- #7: Location of environmental health hazards: Decreased air quality on Fort Carson, combined with potential PFC water quality issues in the Fountain Valley, create less environmentally healthy neighborhoods.

This issue will be addressed with El Paso County assistance in the development of additional publicly- supported affordable housing units in areas of opportunity. This may be done through CDBG funding, Private Activity Bond allocation, El Paso County Housing Authority Housing Trust funds or assistance with obtaining federal and state low-income housing tax credits.

2021 Update to Fair Housing Issue #2: The El Paso County Housing Authority has made significant investment into preserving and creating affordable housing within the last five years. Accomplishments include the following housing projects: [Insert housing projects], which totals [insert total units] within the region.

While the El Paso County CDBG program has not yet identified an appropriate opportunity to help a housing development, efforts will continue to find ways to collaborate. CDBG regulations pose significant barriers that many housing developers' express disinterest in adhering to, particularly when easier funding alternatives exist.

Despite these barriers, there is little question that the need for affordable housing has only increased within the last 5 years since our last AFH document was developed. Housing affordability, housing demand, and access to senior housing have all worsened dramatically. While the CDBG program is not a best fit for addressing the needs of affordable housing, it is an option that must remain open to ensure the ongoing development of affordable homes continues.

Fair Housing Issue #3: A lack of resources to ensure there are adequate accessible units to meet current and future needs. Prioritized factors that contribute to this issue are:

- #1: Lack of assistance for housing accessibility modifications: There are a minimal number of agencies that offer housing accessibility modifications and, when offered, it is usually income restricted.
- #2: Lack of affordable, accessible housing in a range of unit sizes: Due to changing demographics, there is increased need for smaller, affordable housing units in a variety of locations.
- #3: Impediments to mobility: Inability to move to a neighborhood or area of choice, due to lack of available, accessible, affordable units. A shortage of units and Housing Choice Vouchers limits mobility.

This issue will be addressed by committing additional federal and other funds to the rehabilitation of pre-existing housing inventory to increase affordable, accessible housing choices.

2021 Update to Fair Housing Issue #3: While we have met and exceeded our initial goals related to this issue within the last five years, there is no question that the need for housing rehabilitation has only increased since our initial AFH document. As residents continue to age, the ratio of accessible housing to seniors within our communities continues to worsen. Expanded access to housing rehabilitation programs has improved knowledge and awareness of program, but limited funding has restricted the growth of these programs. The El Paso County CDBG program will continue to commit to funding and advocating for these programs as appropriate.

Fair Housing Issue #4: The lack of understanding of federal, state, and local fair housing laws has resulted in the presence of housing discrimination in the region. Contributing factors are:

- #1: Lack of resources for fair housing agencies and organizations: There is a lack of agencies that produce activities which: test, enforce, coordinate, and advocate about fair housing laws.
- #2: Quality of affordable housing information programs: Agencies that perform these activities have limited resources to ensure all needs are met.
- #3: Lack of local public fair housing enforcement: In a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development-Fair Housing and Equal Opportunity and the Department of Regulatory Agencies-Colorado Civil Rights Division, it was discovered that most complaints filed related to disability discrimination. Furthermore, most complaints resulted in no probable cause findings, which could be due to lack of evidence or education.
- #4: Lack of local private fair housing outreach and enforcement: Lack of agencies in the area that provide these services which can result in underreporting.
- #5: Private discrimination: In a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development-Fair Housing and Equal Opportunity and the Department of Regulatory Agencies-Colorado Civil Rights Division, it was discovered that private discrimination is occurring within the region.

This issue will be addressed by increasing fair housing education, outreach, and enforcement. The El Paso County CDBG program will take on the responsibility of coordinating semi-annual education and outreach opportunities.

2021 Update to Fair Housing Issue #4: The El Paso County CDBG program has made significant strides towards improving awareness of fair housing rights within our community. Since the original AFH document was submitted, the program has hosted educational events in smaller, rural pockets of El Paso County (such as Calhan and Green Mountain Falls), as well as participating in larger events with a significant audience (such as the Fountain Senior Center and the city of Fountain's Town Hall). Our program is also happy to share that local resource providers and internet search results have begun directing residents searching for local fair housing resources to our department, specifically because of the fair housing resource page on our website. This web page, which contains information in both English and Spanish, serves as

an initial resource to residents seeking information independently. Residents who contact our office directly about fair housing also receive free referential material, such as pens with the HUD housing hotline printed on them, fair housing magnets, and brochures.

While the program's efforts have been successful since the 2016 AFH document was approved by HUD, there is still much work to be done. Consultations with local municipalities have indicated that persons with disabilities and seniors may still be experiencing additional difficulty obtaining housing because the landlords do not want to provide reasonable accommodations. For this reason, we will continue to improve outreach and education of fair housing law in our region and seek to ensure all residents are aware of their fair housing rights.

III. Community Participation Process

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

El Paso County used a variety of outreach methods to encourage and broaden meaningful community participation in the AFH process. The initial process started with communicating with local staff and elected officials regarding the AFFH Rule and AFH Tool. This internal communication was done with local staff knowledge, HUD AFFH and AFH guidance materials and correspondence and feedback from HUD Region VIII FHEO leadership staff.

The following notice was published to announce the initial planning efforts related to the update of the 2016 AFH document:

Notice of El Paso County's Planning Efforts Regarding an Update to the Assessment of Fair Housing for the Community Development Block Grant (CDBG) Program

Notice is hereby given that the El Paso County Economic Development Division will host multiple meetings on July 16 and July 20, 2021, to discuss the planning efforts underway to complete an update to the program's 2016 Assessment of Fair Housing strategic planning document.

This update is part of the El Paso County CDBG program's commitment to affirmatively furthering fair housing and holistically developing a comprehensive approach to addressing housing needs in El Paso County. This document will help the program take meaningful action to overcome patterns of segregation and foster communities free from barriers that restrict access to opportunities.

The planning meeting will include:

- A brief overview of the CDBG program and 2016 Assessment of Fair Housing
 - Corresponding data and maps
 - Access to a survey to provide public input.

All meeting materials will be available online after the presentations for any members of the community who wish to participate but are unable to join.

In-Person meetings will be held at the following ADA-accessible locations:

Calhan Town Hall
 556 Colorado Avenue
 Calhan, CO 80808
 July 16, 2021
 10:00 am to 11:00 am

Pikes Peak Library District- Fountain Library Meeting Room
 230 Main Street
 Fountain, CO 80817
 July 16, 2021
 1:00 pm to 2:00 pm

In-Person/Virtual Hybrid meetings will be held at the following ADA-accessible location:

El Paso County Economic Development Department
 9 E Vermijo Avenue
 Colorado Springs, CO 80903
 July 20, 2021

Morning meeting: 9:00 am to 10:00 am*
 Call-in instructions: (719)283-1263, meeting ID 290 826 83#
 Evening Meeting: 5:00 pm to 6:00 pm*
 Call-in instructions: (719)283-1263, meeting ID 393 939 150#
 *closed captioning available for virtual attendees

Light refreshments will be served at all in-person meetings.

The Notice was published in both English and Spanish. See appendix for proofs of publication and additional outreach efforts.

Again, El Paso County broadened their efforts to seek community participation, by ensuring the public notice was published in multiple newspapers, in two languages and on the County website.

2. Provide a list of organizations consulted during the community participation process.

- The Town of Monument, 6-7-2021
- The City of Fountain, 7-14-2021
- The City of Manitou Springs, 6-11-2021 and 8-25-2021
- The Town of Calhan, 6-18-2021
- The Town of Ramah, 6-18-2021
- The Town of Green Mountain Falls, 6-11-2021
- Catholic Charities, 6-16-2021
- Calhan Housing Authority, 8-26-2021
- Project Angel Heart, 7-7-2021
- Greccio, 6-17-2021
- Pikes Peak Habitat for Humanity, 6-16-2021
- Rocky Mountain Community Land Trust, 6-16-2021
- Solid Rock Community Fountain, 5-28-2021
- CHAP- Community Information Distribution Lists- Draft and comment period solicitation- the draft and comment period notice were emailed out to over 400 people. This encompassed 100+ organizations plus quite a few unaffiliated individuals. The organizations represented a large scope of agencies ranging from housing and emergency services, to faith-based including churches, to schools and libraries, to public/government entities including judicial organizations.
- The El Paso County Housing Authority (Commissioners)- August 10, 2016
- The El Paso County Community Development Advisory Board (District 1; District 2; District 3; District 4; District 5; City of Fountain; Town of Calhan; Town of Ramah; Town of Green Mountain Falls; Town of Palmer Lake; City of Manitou; Town of Monument), June 16, 2021
- U.S. Department of Housing and Urban Development- coordination with HUD representative Chris Davis.

This list is not an all-inclusive list of all agencies interacted with. Additionally, a variety of planning processes and documents have been examined.

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

Historically, the El Paso County CDBG Program receives little to no community participation. During the 2016 AFH planning process, public outreach efforts were redesigned to ensure information reached citizens, giving multiple opportunities and avenues to participate. While there was low attendance at public meetings, robust feedback was received from the public survey. In particular, efforts to reach citizens living in the most rural areas by supplying a fair housing survey enclosed with their utility bill was the most successful effort. El Paso County received over 50 total survey responses. A detailed summary of those responses is noted in the supporting document section.

Additionally, El Paso County broadened their efforts by reaching out to multiple organizations that serve ethnic/racial minorities. This outreach was done via email and phone introductions, requests to attend agency meetings and have members attend AFH public meetings and/or provide public input on the planning process and draft document.

While no response was received, El Paso County believes that broadening the efforts with more frequent communication and invitations will eventually build a foundation for a more established relationship.

For the 2021 AFH update, additional efforts were placed into direct consultations with local stakeholders, particularly housing-based nonprofits and agencies. Consultation meeting minutes are attached to the appendix of this document.

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

During the development of the 2016 AFH document El Paso County held a series of public meetings and published information on the program's website and in two local newspapers. The initial community engagement conducted focused on outreach, education and receiving public feedback about fair housing in the region. An initial fair housing survey was disbursed and over 50 total responses were received. While the small group consults and the public meetings and surveys revealed the overarching theme that there is a lack of affordable housing options throughout El Paso County. This was expressed numerous times during small group consultation meetings with agencies that address housing in the region. Furthermore, a recurring theme was the extensive waitlists that those of low- to moderate income encounter when trying to access housing. Additionally, it was also discussed that the need for accessible units severely increases the waiting timeframe for someone to access publicly supported housing. An overall lack of units detrimentally affects a person's housing choice.

IV. Assessment of Past Goals, Actions and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:
 - a. Discuss what progress has been made toward their achievement.

Since the submission of our 2016 AFH document, El Paso County has made significant strides in all the 4 fair housing issues identified. The exact form and nature of those accomplishments has changed over time and become different than what was initially imagined, but part of meeting the needs of the community requires a certain amount of flexibility and responsiveness to changing needs. Specific progress delineated in the bulletins below:

- **Fair Housing Issue #1- Access to Transportation**
 - Through the installation of ADA compliant sidewalks within low to moderate income areas, we have increased access to multimodal transportation and access to opportunities via the following projects:
 - 2017 City of Fountain ADA Sidewalks Improvements
 - 2017 City of Manitou Springs School Zone Safety ADA Improvements
 - 2018 City of Fountain Southmoor Subdivision ADA Improvements
 - 2018 El Paso County Galley Road Phase 2 Improvements
 - 2018 Town of Calhan Colorado Avenue Improvements
 - 2019 City of Fountain Southmoor Extended ADA Improvements
 - 2020 City of Manitou Springs Canon Avenue ADA Improvements

- 2020 El Paso County Widefield AD Improvements
 - 2020 City of Fountain Prado Drive Improvements
 - 2021 Town of Monument Beacon Lite Road ADA Improvements
 - 2021 City of Manitou Springs El Monte Place ADA Improvements
 - Through the support of public service projects focused on transportation services, we have increased the availability and frequency of public transportation in the region via the following projects:
 - 2017 Silver Key Senior Services Transportation Drive Project
 - 2019 Envida Expanding Transportation Services in Eastern El Paso County Project
 - 2020 CDBG-CV Envida COVID-19 Access to Health for Rural Seniors
- **Fair Housing Issue #2- Access to Affordable Housing**
 - Through the El Paso County Housing Authority’s support of local affordable housing developments along with the utilization of Private Activity Bonds that El Paso County used on affordable housing, the following affordable housing complexes have been funded in the last five years:
 - Traditions at Colorado Springs
 - 180 units of senior housing
 - Rocky Mountain Apartments
 - 18 units in an adaptive reuse
 - Freedom Springs
 - 50 units of permanent supportive housing
 - Greenway Flats
 - 65 units of permanent supportive housing
 - Winfield Apartments
 - 160 units in an acquisition and rehabilitation
 - The Creek at Cottonwood
 - 258 units of workforce housing
 - Barnes Apartments
 - 242 units of workforce housing
 - Atrium at Austin Bluffs
 - 54 units of senior housing
 - Shooks Run
 - 40 units of workforce housing
 - Villas at Mesa Ridge
 - 60 units of senior housing
 - Academy Heights
 - 200 units of workforce housing
- **Fair Housing Issue #3- Access to Housing Rehabilitation**
 - Through the support of Brothers Redevelopment, our program has assisted ___ housing developments over the last five years
- **Fair Housing Issue #4- Access to Fair Housing Education**
 - Through the implementation of a biannual fair housing education program, over ___ persons have been provided direct access to fair housing education and resources.

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

El Paso County has made significant strides in addressing past impediments, but there is still more work to be done. El Paso County became an entitlement community in 2009. As a result, only one Analysis of Impediments/Fair Housing Plan was completed prior to the Assessment of Fair Housing. The initial efforts to create community resources for fair housing education has been successful, however, community outreach and education should be a continual and never-ending process. Addressing major social and public policy concerns has proved to be a more challenging effort. El Paso County CDBG staff is committed to continuing the outreach, education and awareness efforts that will someday impact future local policy changes. After the approval of our 2016 AFH document, our program was able to identify that there are several challenges related to using CDBG funding to support publicly funded affordable housing developments. Examples of these challenges include developers unwilling to work with CDBG regulations, lack of significant capital within our program, and most housing developments going within the City of Colorado Springs, which is outside our program's jurisdiction. Furthermore, staff concluded that the most effective way to remove impediments to fair housing choice and increase access to opportunity for all, was by strategically implementing various forms of publicly supported housing and ensuring public investments in specific neighborhoods, including services and amenities. This was accomplished by allocating CDBG funding to economically distressed target areas, carefully examining sites proposed for future affordable housing developments (funded with Private Activity Bond Allocation or El Paso County Housing Authority Trust Fund monies) to ensure that the sites were in environmentally healthy neighborhoods with greater access to opportunity, and by implementing a homebuyers program (Single Family Turnkey and Single Family Turnkey Plus) that offered grant assistance for down payments, which increased mobility options for many in the community.

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

El Paso County has made significant efforts towards fair housing outreach and education within the last five years. However, some residents have communicated that filing a fair housing complaint is not as effective as they would like because in most cases, they still need to find somewhere else to live. Working with community partners to find ways to improve interim or rapid response to fair housing complaints could create a more ideal pipeline to help citizens be served more effectively and efficiently.

As always, improved availability of scattered site vouchers and tax credit financing to further equitable access to opportunities and various types of housing would be ideal but requires increased partnership and commitment at the federal level. Our program hopes to address this by strengthening relationships with key federal level agencies and building an open and transparent line of communication.

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

For El Paso County and the other program participants, the experience is limited to the last twelve years. Not until 2008 did the area qualify as an Urban County and not until 2009 was it able to meet the necessary deadlines for submittal of the various plans.

Our selection of current goals is largely based on community feedback during our consultation processes and data provided through HUD and the Census Bureau. We feel this qualitative/quantitative approach is balanced and thorough identifying the issues that are both urgent and feasible for our funding sources to address.

V. Fair Housing Analysis

A. Demographic Summary

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

From 1990-2020, El Paso County, Colorado, experienced several changes to its demographic makeup, some of which did not match the changes that occurred over the first 20 years of data. The Hispanic population has continued to see growth throughout the last decade. U.S. Census 2019 estimates put the Hispanic population at 15.6% of the El Paso County population, which is just over twice as high as the 1990 percentage and 23% higher than the 2010 percentage. This trend continues to be the largest change of any Non-White race/ethnicity within the county. As would be expected, the largest group of Low English Proficiency (LEP) persons is Spanish speakers. The data from Table 1 demonstrates a clear trend of Hispanics, both English proficient and LEP, moving to and/or remaining in the area. As of 2019, Hispanics are the second-most populous race/ethnicity by a large margin.

The Non-Hispanic Blacks have not experienced the population representation decreases that they experienced in the 2000s. After holding about 7% representation in 1990 through 2010, their percentage dropped to 5.9% in the 2019 US Census Estimates even as the population totals have increased. The Non-Hispanic Black group has not seen the same growth as the other races/ethnicities.

According to 2019 US Census Data Estimates, the Hispanic population within the El Paso County Jurisdiction has grown in number and percent of total population. In 2010, there were 26,408 Hispanic people making up 12.89% of the county. By the 2019 estimates, those numbers have grown to 37,751 and 15.6%.

The White population has seen a similar increase to the Hispanic population. Even though there was an almost 4% decrease from 2000 to 2010, the population rebounded according to 2019 US Census Estimates to bring the percentage up to 80.3%. That's a large jump within a decade and helps to show how the Non-Hispanic Black community has dropped slightly.

Both the Non-Hispanic Native American and Asian/Pacific Islander populations have seen decreases in their total population numbers. Native Americans have decreased from 2,902 to 2,343, while Asian or Pacific Islanders have decreased from 7,967 to 6,119. Their respective percentages in the county population makeup have decreased since 2010 as well.

The interesting development within the Limited English Proficiency Languages for El Paso County is that Slavic Language moved into the #3 spot. It isn't by an overwhelming margin, but to have eastern European languages as a higher percentage than almost every other language is uncommon considering Other Eastern Europe is #6 on the national origin list.

According to Table 1, Germany has supplanted Mexico as the #1 country of origin within the El Paso County jurisdiction. In the city of Colorado Springs, Mexico is still the #1 country of origin.

According to the 2019 US Census Estimates, The Urban County's disabled population primarily consists of persons with ambulatory and cognitive difficulties. Cognitive is the most common, but this difference is less than half a percent. Hearing and independent living difficulty are third and fourth respectively, but the difference between these is less than half a percent. Disabled persons make up 10.1% of the entire the Urban County population.

Regionally, many of the demographic changes that have occurred within the Urban County can be reflected, if not magnified, in the city of Colorado Springs. There is a noticeably higher concentration of persons of Black, Hispanic, and Asian origin in the south/southeastern portion of the city, but the Hispanic R/ECAP that was located in the southeastern portion of Colorado Springs is no longer present in 2020 HUD data. While there is greater disbursement of persons of Black, Hispanic, and Asian origin in the western and northern areas of the city in present day, the greatest concentrations still remain in the southeastern area of the city.

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

The 2016 Assessment of Fair Housing mentioned the relatively high rate of homeowner occupied housing, with renter occupied housing being located primarily near the military bases located throughout the jurisdiction. Concentrations between 16% and 30% can be found along the northernmost and southernmost portion of the I-25, as well as along Highway 24 traveling east toward and the area surrounding Peterson Air Force Base. However, when it comes to affordable rents, according to 2019 US Census Estimates, the #2 and #3 cheapest county to rent in are also the two counties farthest from Colorado Springs, which is where many residents work. Living an hour away from your job takes hours out of the day along with requiring reliable transportation and money for gas.

The 2016 Assessment of Fair Housing also talked about the consistency that El Paso County has experienced in the 2000s with the percentage of owner-occupied units remaining within 1.5% over 10 years (63.2% to 64.7%). That consistency carried right over into the following decade. According to 2019 US Census Estimates, owner-occupied units make up 64.1% of the county housing stock. The consistency is a positive sign that even as the County continues to have a

transient military population, the number of people owning homes and generating wealth has remained the same.

B. General Issues

i. Segregation/Integration

1. Analysis

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

Generally speaking, the Urban County experiences low levels of segregation across different racial and ethnic groups. In 2020, White to Asian and Pacific Islander segregation remains the lowest with a dissimilarity index score of 25.29. Hispanics to Whites and Non-White to White both remain around 30 for their index. The dissimilarity index for Black to White is the highest of all the groups at 43.12. Like our 2016 AFH document's information, this is in the moderate category.

From a regional perspective, Table 3 demonstrates that Colorado Springs experiences racial/ethnic dissimilarities trends very similar to the Urban County. Much like the Urban County, the city of Colorado Springs experiences the greatest racial/ethnic dissimilarity trend between persons of Black and White racial/ethnic background. In 2016, data showed a R/ECAP within Colorado Springs. Updated R/ECAP data is not available and it is no longer certain if there is a R/ECAP within Colorado Springs.

- b. Explain how these segregation levels have changed over time (since 1990).

In 1990, the Asian or Pacific Islander to White dissimilarity index was in the low segregation category at 27.69. The dissimilarity index dropped to 23.06 in 2000, and then rose slightly to reach 24.80 in 2010. Generally speaking, this data suggests that there is a low level of segregation between Whites and Asian or Pacific Islanders, and that what segregation did exist has in fact decreased since 1990.

The Hispanic to White dissimilarity index displays a trend that since 1990 Hispanic to White segregation has steadily, albeit slowly, increased. 1990 data reveals an exceptionally low dissimilarity index at 27.55 between the two racial/ethnic groups. However, in 2000 it rose to 29.04 and then again in 2010 increased to 30.51. While these numbers are all considered to be in the low segregation category, there is still a clear increase in the dissimilarity index.

The White to Non-White dissimilarity index indicates that segregation levels have maintained within a +/- 2 points of 31. 1990 saw the highest value, at 32.33, but then dropped to 29.63 in 2000 and increased slightly to 31.39 in 2010. Overall, these changes are very minor and display a lack of significant change between White to Non-White segregation levels.

Black to Non-White segregation has seen the greatest changes on the dissimilarity index. From 1990 to 2000, the Black/White dissimilarity index dropped from its highest point of 44.69 to its lowest at 40.67, almost into the low segregation category. However, from 2000 to 2010, the dissimilarity index rose from 40.47 to 44.47, almost to 1990 levels. While this trend is only +/-4 points on the dissimilarity index, it is still indicative of change when it is placed in comparison to the more relatively stable patterns displayed by other racial/ethnic categories on the dissimilarity index.

The trend that is shown in Table 3, is that the current dissimilarity indices for all 4 categories have increased since 2010. Compared to the 1990 numbers, Asian or Pacific Islander/White is the only category to have decreased at their current levels.

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

In the Urban County, there are no areas of significant segregation; however, there are locations with integration. The most significant area of integration across demographic, national origin, and LEP is the Fountain Valley region, which encompasses the areas commonly referred to as Security-Widefield, Stratmoor Hills, and Fountain. In particular, Fountain Valley has the highest concentration of LEP Spanish speakers in the Urban County, as well as the highest concentration of persons of German national origin, and demographically speaking, the highest integration across race/ethnicity. This area is also very close to the Fort Carson Army base. Both locations have a level of racial/ethnic integration similar to Fountain Valley.

A challenge faced by our program for the 2021 AFH update is the lack of 2020 Census data. Originally planned to be released in the summer of 2021, this data has been delayed and our program has had to rely primarily on 2019 ACS data, which is not as reliable or detailed. However, comparing the northern half of the County to the southern half of the County using the data available reveals a much higher population of minority groups in the southern half of the County.

Despite Hispanic being the second-highest race/ethnicity in the Urban County, there is only a very loose grouping of persons of Mexican national origin in Security-Widefield, and no clear trends elsewhere in the Urban County. Also, there is a very loose concentration of persons of Philippines national origin located due north of Colorado Springs, in the Monument/Black Forest areas. This trend is also backed by the loose concentration of the Asian or Pacific Islander demographic in the same areas. The Asian or Pacific Islander grouping in Monument/Black Forest is supported in Map 2 of the 2020 El Paso County demographics.

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

In the 2016 Assessment of Fair Housing, it was found that there was no significant connection between owner and renter occupied housing and segregated or integrated areas. The highest renter-occupied areas in the Urban County, Fort Carson and the Air Force Academy, having renter occupied rates in excess of 68% because the majority of service members who live on base

and either in the barracks, or in some form of assigned rental housing. Conversely, the area with the highest percentage of LEP, varied national origin, and racial/ethnic diversity is Fountain Valley. However, this area has a renter-occupied rate below 30% (specifically, in the 16.8%-29.4% range). In terms of landmass, the vast majority of the Urban County has an owner-occupied rate in excess of 81%.

- e. Discuss how patterns of segregation have changed over time (since 1990).

As shown by the data in Table 1, as well as in Maps 1, 2, and 3, there is not statistically or geographically significant segregation in the Urban County. While there is more racial/ethnic diversity in the more urbanized areas of the Urban County, White Non-Hispanic persons account for more than 70% of the Urban County's population, and the remaining Non-White population is spread out more or less homogeneously throughout each area of the Urban County.

A challenge faced by our program for the 2021 AFH update is the lack of 2020 Census data. Originally planned to be released in the summer of 2021, this data has been delayed and our program has had to rely primarily on 2019 ACS data, which is not as reliable or detailed. However, comparing the northern half of the County to the southern half of the County using the data available reveals a much higher population of minority groups in the southern half of the County.

- f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

Looking forward, there is no question that within all areas of El Paso County, there is a need for additional affordable housing. Additionally, this housing needs to be connected to low-cost transportation, an amenity that the majority of the Urban County does not have. Failure to accomplish these two objectives could very well result in the overcrowding of already existing affordable housing units, and segregate certain neighborhoods to one or two racial/ethnic groups. In particular, individuals with Low English Proficiency may find themselves with fewer housing choices and cluster into specific neighborhoods. Consultations with housing-based agencies, such as Greccio, Rocky Mountain Community Land Trust, Pikes Peak Habitat for Humanity, and others have helped our program to recognize that the continued lack of affordable housing is our area's largest threat to equitable housing access.

2. Additional Information

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

Upon reviewing all HUD maps in the AFFH Tool that cover race, color, religion, sex, familiar status, national origin, and disability, there is no statistically significant data to support any protected groups experiencing segregation in El Paso County. In addition, maps provided by the Regional Housing Assessment were reviewed and confirmed the lack of protected class segregation in El Paso County.

Regionally speaking, Map 1 suggests that there is a certain amount of segregation experienced by Hispanics and potentially Blacks within the city of Colorado Springs. The southeastern section of the city appears to have a much higher concentration.

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

Consultations with housing-based agencies, such as Greccio, Rocky Mountain Community Land Trust, Pikes Peak Habitat for Humanity, and others have helped our program to recognize that the continued lack of affordable housing is our area's largest threat to equitable housing access. In terms of improving place-based investments and mobility options for protected class groups, it is worth noting that there is a correlation between persons with ambulatory disabilities living close to major roadways (i.e., I-24, Highways 24 and 94). This is almost certainly by choice to increase access to services, but to allow ambulatory disabled persons greater freedom, improving public transit and mobility services to the disabled would be necessary.

3. Contributing Factors of Segregation

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

- Community Opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Other

As previously discussed, continued lack of affordable housing is our area's largest threat to equitable housing access. According to the National low Income Housing Coalition's 2019 report, within the Metropolitan Statistical Area of Colorado Springs, there are 92,830 renter households. The Fair Market Rent for a 2-bedroom unit is \$1,200. Unfortunately, the average renter wage within the MSA is \$16.63. This means that the renter must work 75 hours a week at that wage to earn enough to pay for their fair market rental unit. The numbers show that the lack of affordable housing within El Paso County puts undo burden upon renters who are below 80% AMI. The rents are high and the wages do not make the housing attainable, let alone affordable.

ii. R/ECAPs

1. Analysis

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

In the 2016 AFH document, it was discussed that there are no R/ECAPs within the Urban County. At the time there was one R/ECAP within Colorado Springs. The updated AFH mapping tool no longer shows a R/ECAP within Colorado Springs. This is either because the R/ECAP is no longer present or because the mapping tool no longer supports this function.

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

In the 2016 AFH document, it was discussed that there are no R/ECAPs within the Urban County. At the time there was one R/ECAP within Colorado Springs. The updated AFH mapping tool no longer shows a R/ECAP within Colorado Springs. This is either because the R/ECAP is no longer present or because the mapping tool no longer supports this function.

- c. Describe how R/ECAPs have changed over time (since 1990).

In the 2016 AFH document, it was discussed that there are no R/ECAPs within the Urban County. At the time there was one R/ECAP within Colorado Springs. The updated AFH mapping tool no longer shows a R/ECAP within Colorado Springs. This is either because the R/ECAP is no longer present or because the mapping tool no longer supports this function.

2. Additional Information

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

In the 2016 AFH document, it was discussed that there are no R/ECAPs within the Urban County. At the time there was one R/ECAP within Colorado Springs. The updated AFH mapping tool no longer shows a R/ECAP within Colorado Springs. This is either because the R/ECAP is no longer present or because the mapping tool no longer supports this function.

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

In the 2016 AFH document, it was discussed that there are no R/ECAPs within the Urban County. At the time there was one R/ECAP within Colorado Springs. The updated AFH mapping tool no longer shows a R/ECAP within Colorado Springs. This is either because the R/ECAP is no longer present or because the mapping tool no longer supports this function.

Contributing Factors of R/ECAPs

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

- Community Opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Other

As indicated by the data from HUD and local resources, there are no R/ECAPs located in the Urban County, and as such, there are no factors that have created, contributed, perpetuated, or increased the severity of R/ECAPs. Please note that the evidence suggests the mapping tool no longer supports this function and we are unable to evaluate this portion.

iii. Disparities in Access to Opportunity

1. Analysis

a. Educational Opportunities

- i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

In reference to Table 12 and the School Proficiency Index (defined as the measurement of the proficiency of elementary schools in the attendance area; the values for the index are determined by the performance of 4th grade students on state exams), there are disparities between different racial or ethnic groups. However, within the total population, the disparities only differ by 5. For the population below the federal poverty line, the disparity is less than 10. White Non-Hispanics have the highest School Proficiency index at 59.12, with Black Non-Hispanics rating the lowest at 54.12. Hispanics, Asian or Pacific Islander, and Native American all rank in between these values, which suggests that the greatest disparity exists between White and Black Non-Hispanics.

While Table 12 does not specifically reference national origin, the AFFH map tool reveals that most persons of German and Mexican national origin live in areas where the school proficiency

index is above 50. However, it is important to note that persons with top four national origins account for less than 3% of the Urban County population (as seen in Table 1). As such, this data is restricted in usefulness and trends may not indicate true disparities in access to proficient schools.

In terms of family status, where the highest percentage of households with children are located, in the area around and just north of Fort Carson, there are also the least proficient schools. This disparity can partly be attributed to the transient nature of families on both military bases, meaning that children attending school in these areas are probably pulled out of school more frequently and their test scores suffer as a result.

- ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

The eastern half of the Urban County is inhabited mostly by persons of White, Non-Hispanic race/ethnicity. This section of El Paso County also suffers from some of the lowest school proficiency in the Urban County, and as such, the population located here has the least accessibility to proficient schools (due mostly to their geographic distance from more proficient schools).

Hispanics that live in the southern portion of El Paso County tend to live in areas with a school proficiency index below 40, while Hispanics that live north of Colorado Springs tend to live in areas with a school proficiency index above 40. This is mostly due to the northern half of the Urban County (particularly near Monument) trending towards higher school proficiency than the southern half. Blacks and Asians in El Paso County experience a location disparity similar to Hispanics, only in smaller concentrations due to their smaller population size.

Outside of the area just to the north of Fort Carson, Hispanics that live in El Paso County tend to live in areas with a school proficiency index above 50. Blacks and Asians in El Paso County experience a location disparity similar to Hispanics, only in smaller concentrations due to their smaller population size. There are pockets of lower school proficiency south and well north of Colorado Springs, however there is no trend of segregation or disparity due to their residence within a census tract.

In relation to national origin, persons of Mexican and German descent tend to be located in areas with a school proficiency below 40. In contrast, persons of Philippine and Korean national origin are concentrated in areas with a school proficiency above 40.

In the northern half of Urban County, there are three pockets of Philippine nation origin population. The lowest school proficiency within these areas is 87. To the south of Colorado Springs, the area with the highest school proficiency also correlates with a solid pocket of Korean national origin.

In terms of family status, the two areas of the Urban County with the largest population of households with children, Fort Carson, and the Air Force Academy, also have school

proficiencies below 40. Another area with a significant number of households with children, Falcon, has a school proficiency index above 50. Although the Monument area has some of the highest school proficiency in the Urban County, the number of households with children trends below 60% and in some areas, below 40%.

In terms of family status, where the highest percentage of households with children are located, in the area around and just north of Fort Carson, there are also the least proficient schools with an index of below 50. The area around the Air Force Academy also has a high number of households with children, but their school proficiency is above 90. In and around Fountain, where the percentage of households with children is above 60%, the school proficiency index is 50 and above. Finally, the last area that has a high percentage of households with children is between Peyton and Falcon. The school proficiency index is high there as well, at 75.

- iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

Amongst the 17 different school districts in El Paso County, a select few (such as Cheyenne Mountain School District 12, and Academy School District 20) are exceptionally higher rated and considered high quality school districts. However, many people who would like to get their children into these schools are unable to do so due to the limited public transportation system or fail to get accepted into the school district of their choice during the open enrollment period. The ability to get into these schools is often based on availability, which changes from year to year. Therefore, families who want to get their children into a better school district must be both lucky and financially equipped to provide transportation. Based upon the low poverty index in Table 12, this would suggest that Native American Non-Hispanic persons, especially in the Fountain Valley area of El Paso County, are at the greatest disadvantage when it comes to accessing proficient schools.

b. Employment Opportunities

- i. Describe any disparities in access to jobs and labor markets by protected class groups.

Perhaps the greatest disparity in access to jobs and labor market is the difference between the White Non-Hispanic and Black Non-Hispanic labor market engagement index (defined as a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's index, by neighborhood). While the White Non-Hispanic labor market engagement index sits at 54.24, the Black Non-Hispanic is 37.79. With a range of over 16 points, it is clear that Black Non-Hispanics in El Paso County have access to fewer job markets than White Non-Hispanics, although the sizable difference in population between the two racial/ethnic groups may be partially to blame for this difference. The labor market engagement index uses percentages, which means the population difference is rendered moot.

In contrast, it is worth mentioning that there is very little difference or disparity between different race/ethnicity's jobs proximity index (defined as the physical distance between a place

of residence and jobs by race/ethnicity). With a range of fewer than 4, it is difficult to say there is disparity as there is not enough statically significant data to draw a conclusion.

- ii. How does a person's place of residence affect their ability to obtain a job?

Depending on which part of the Urban County a person lives, they have little to no opportunities to utilize public transportation, or they may have to commute long distances in a personal vehicle to obtain a job. This is particularly true for persons living in the eastern half of the Urban County. Map 10 clearly demonstrates that eastern sections of the Urban County have a very low job proximity index (below 30), and as such it is reasonable to assume that members of these communities commute excessively long distances to work. Coupled with the fact that there is no public transportation in these areas, having a personal vehicle is practically required to obtain a job.

Additionally, living far away from a job can make certain jobs undesirable or useless because the cost spent on transportation will be greater than the value of the income. Combined with the potentially dangerous winters in El Paso County, jobs outside a certain distance from the home become unappealing and limits a person's pool of job opportunities.

- iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

As previously stated, amongst race/ethnicity, there is no statistically significant difference in relation to the jobs proximity index. With a range of less than 4, it is difficult to rationalize any claims to one race/ethnicity have advantages over the other. Percentage of households with children also does not yield any clear results, as the rural data on Map 9 skews the appearance of the map, causing members of rural El Paso County to be excessively represented. When accounting for this, there is no significant percentages of households that experiences less success in accessing employment.

As explained in (b)(i), the greatest disparity in access to jobs and labor market is the difference between the White Non-Hispanic and Black Non-Hispanic labor market engagement index. While there is a sizeable population difference between the two racial/ethnic groups, it is clear that of all races and ethnicities in the Urban County, Black Non-Hispanic persons are the least successful in accessing employment.

However, it is clear from Map 9 covering job proximity and national origin, that German and Mexican persons have a clear disadvantage due to their clustered location in Fountain Valley, which has an overall low job proximity rating.

c. Transportation Opportunities

- i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

As demonstrated in maps 12 and 13, there is no single area that suffers from significantly more expensive transportation costs. However, citizens of El Paso County that reside in the more rural,

eastern half of the Urban County, especially suffer from having little to no public transportation available at all.

- ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

In reference to maps 12 and 13, there are no disparities in access to transportation. Unfortunately, this is because the public transportation system in El Paso County is severely lacking, so everyone, regardless of protected class, suffers from this problem equally. Given the fact that El Paso County encompasses over 2,000 square miles, and much of the land being rural or undeveloped, a comprehensive county-wide transportation system would be difficult to implement.

- iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

The overall lack of public transportation availability is damaging to all persons. This is particularly true for persons with ambulatory disabilities, who tend to live off major roads for the sake of access to necessary services. This shortcoming was also noticed during the 2016 El Paso County Assessment of Fair Housing survey, wherein approximately 76% of respondents agreed that there are no reliable transportation connections between homes and opportunities in El Paso County.

Since 2016, bus service has greatly expanded within our region. In addition to efforts outlined from the CDBG program, the Colorado Springs bus system now reached into Manitou Springs, the edge of Monument, and Security/Widefield. Unfortunately, hours of service are still limited to 5 am to 7 pm. Residents who need transportation outside these hours are severely limited in their options.

d. Low Poverty Exposure Opportunities

- i. Describe any disparities in exposure to poverty by protected class groups.

Exposure to poverty is not entirely equal among different race/ethnicities. Although White Non-Hispanics have a low poverty index of 69.94, Black Non-Hispanics have an index of 64.93. While the difference of 5 is not incredibly significant, it is enough to indicate that Black Non-Hispanics do have greater exposure to poverty than White Non-Hispanics. This notion is also made clear through the Map 12, which shows the trend of Black Non-Hispanics to reside in the Security-Widefield area, which for the most part experiences a low poverty index below 40.

For persons of non-United States national origin, persons of Mexican and German national origin experience the highest exposure to poverty. The area with the greatest grouping of Mexicans and Germans, the Security-Widefield area, also has a poverty index trending below 40. As previously stated, it is also important to note that there are relatively few persons of non-United States

national origin in the Urban County, which potentially makes the data in regards to national origin less reliable.

In regard to households with children, there is a large cluster of families exposed to poverty just north of Fort Carson, which can potentially be explained in part by the increased likelihood of single family incomes among military families. The Security-Widefield area of Fountain Valley also has areas with a low poverty index around 40, however these areas have a smaller percentage of households with children. North of Fort Carson has about 80% of families with children, where the Security-Widefield area is closer to 50%.

ii. What role does a person's place of residence play in their exposure to poverty?

Place of residence is perhaps the single greatest contributing factor to a person's exposure to poverty. There are a number of areas, particularly to the north, that have very low exposure to poverty levels. It is safe to assume, in studying Map 12, that persons in those areas regardless of race/ethnicity, national origin, or any other protected class are exposed to far less poverty than other areas of the Urban County, such as portions of Fort Carson, Stratmoor Valley, and the western edge of the Urban County. Conversely, persons who live in areas southeast of Security Widefield, in sections that have a low poverty index above 40, must travel through areas with higher exposure to access the city of Colorado Springs.

iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

As previously discussed in (1)(d)(i), Table 12 clearly demonstrates that persons of Black Non-Hispanic race/ethnicity are the most affected by poverty indicators displayed in Maps 14. While it is important to note that persons of Black Non-Hispanic race/ethnicity account for less than 6% of the overall population in El Paso County, there is enough disparity in the low poverty index to confirm this trend.

As previously discussed in (1)(d)(i), Table 12 clearly demonstrates that persons of Black Non-Hispanic race/ethnicity are the most affected by poverty indicators displayed in Maps 12. However, while White Non-Hispanics and Asian or Pacific Islander Non-Hispanics are in the 69's, the disparity between those two populations and the other 3 is not that great. Black Non-Hispanics, Hispanics and Native American Non-Hispanics are all lower, they are all right around 65. The positive sign in this is that one racial/ethnic group does not experience a worse low poverty index than the others.

For national origin, there is not enough disparity or statistical significance to the grouping of persons of Mexican or German national origin to single one national origin out. Additionally, there are enough persons of German or Mexican origin located throughout the Urban County to suggest this grouping has less to do with poverty and more to do with ease of access to Fort Carson or other economic opportunities.

Families with children do not experience more poverty than other family types per se, however it is important to note that certain locations with larger percentages of households with children (such as Fort Carson) are exposed to poverty more than families with children in other parts of

the Urban County. However, this has less to do with the family status itself and more to do with the specific location of residence.

- iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

There are a number of barriers within the Urban County, and the city of Colorado Springs, that diminish the ability of protected class groups to access low poverty areas, mostly through a lack of affordable housing. As discussed in our 2016 AFH, Colorado Springs's demanding zoning codes make additional infill of the city difficult, even more so for multi-family housing units. Since 2016, Colorado Springs had improved their zoning codes to prove infill. Please note that the city of Colorado Springs is within the region, but outside the jurisdiction so El Paso County has no authority over their zoning and land use process.

In a similar fashion, the NIMBY-ism (Not In My Backyard mentality refers to a community opposition to a proposal based on its location to their property) attitude that is present in El Paso County makes it exceedingly difficult for additional human services establishments to be built. Such establishments are especially important for disabled persons and households with children. As a result, citizens who must be near certain kinds of human service are limited in their residency options, which can ultimately force them into areas with higher poverty exposure.

e. Environmentally Healthy Neighborhood Opportunities

- i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

There is no disparity in access to environmentally healthy neighborhoods by race/ethnicity. This data is clearly displayed in Table 12, which shows that the range of the environmental health index is within 4 points. Such a slight range fails to illustrate any true disparity amongst racial/ethnic groups. Data from 13 supports this conclusion as well.

The results of national origin are similar to race/ethnicity. There are no statistically significant differences in access to environmentally healthy neighborhoods in terms of national origin. Not only is this clearly demonstrated by Map 13, but it is also supported by the lack of racial/ethnic disparity in access to environmentally healthy neighborhoods.

The results of familial status are similar to the first two. There are no statistically significant differences in access to environmentally healthy neighborhoods in terms of family status. Not only is this clearly demonstrated by Map 13, but it is also supported by the lack of racial/ethnic disparity in access to environmentally healthy neighborhoods.

The only area of the Urban County that has an Environmental Health Index of less than 90 is just to the south of Colorado Springs and the Colorado Springs Airport, shown on Map 13. This area drops down by less than 20 for environmental health showing that the area is only good, compared to the great results from the rest of the county. Improvements to our community's health index since 2016 can be largely attributed towards the commitment of the military and the

local water utility providers to eliminate PFCs from the water. Additionally, the closure of the downtown power plant means that there is no longer a coal-burning power plants within the immediate metro area.

- ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Since there is no clear disparity amongst racial/ethnic, or national origin protected groups, the only protected group that has the least access to environmentally healthy neighborhoods is families with children in the Air Force Academy and Fort Carson regions.

There is no disparity in access to environmentally healthy neighborhoods by race/ethnicity, national origin, or family status. Improvements to our community's health index since 2016 can be largely attributed towards the commitment of the military and the local water utility providers to eliminate PFCs from the water. Additionally, the closure of the downtown power plant means that there is no longer a coal-burning power plants within the immediate metro area.

f. Patterns in Disparities in Access to Opportunity

- i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

Before digging too deeply into patterns in disparities in access to opportunity, it is important to mention that El Paso County has a number of features that make the Urban County unique, particularly in comparison to other nearby counties. El Paso County has over 2,000 square miles, which makes it exceptionally large for an Urban County, especially in Colorado. Additionally, there is an altitude range of almost 10,000 feet in the Urban County alone. A variety of climates, from the steep western slopes to the eastern prairies, play a part in determining the shape of the community.

In Table 3, the greatest disparity is between Black and White racial/ethnic groups. It is important to keep in mind the large difference in population between the two groups (White Non-Hispanics account for 74.47% of the population, while Black Non-Hispanics account for 5.57%.) It is true that in viewing Map 4, it would almost appear as if LEP persons are concentrated in the Fountain Valley area, but this is simply because this is the area of the Urban County with the highest population concentration and urbanization. This trend also holds true for persons of non-United States national origin. In short, when the population of El Paso County is examined by protected class groups, there are no statistically significant disparities in access to opportunity.

Yet when the Urban County is broken down by different areas, location-specific trends begin to emerge. This is particularly true in the Fountain Valley area. While the area enjoys a relatively

low housing burden and the greatest racial/ethnic diversity in the Urban County, it also has its fair share of barriers in access to opportunity. Specifically, the area suffers from a low job proximity index, low labor market index, low public transportation access, and certain areas have a low poverty index trending below 40. These issues do not single out one specific protected group, but rather affect every resident of Fountain Valley.

The eastern half of El Paso County is primarily comprised of rural prairie with small towns. The rural aspect of this area is only made clearer by the fact that there is only one section 8 housing location in the entire eastern area, as well as less than 2.88% of households making use of housing vouchers according to the 2016 Assessment of Fair Housing. However, the housing burden in this area is significant (over 31%) and the school proficiency index is very low (below 30). Coupled with low job proximity, low labor market, and essentially no public transportation to speak of, there are clear limitations what opportunities are accessible in this location. For residents seeking a rural lifestyle, these factors may seem insignificant.

In terms of familial status, the area with the greatest barriers preventing access to opportunity is Fort Carson. Although over 80% of households on base have children and the job proximity index is high, the base has a very low school proficiency index, high housing burden, low labor market index, and low environmental health.

2. Additional Information

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

2019 US Census Estimates point out that the El Paso County region as a whole suffers from low homeownership rates among Blacks, Asians, and Hispanics. The Assessment suggests this may partially be explained by Asians and Hispanics are culturally more likely to reside in multigenerational homes. This is further compounded by the fact that since 2010, rental units that cost less than \$500 only make up 4.6% of the rental stock within El Paso County. At the same time, units that cost more \$1,000 now make up over 75% of the available units and over 50% cost more than \$1,500.

Regional issues were also highlighted in the IC Study, the assessment highlights the number of disabled persons who have difficulty finding safe and affordable housing. ADA compliant affordable housing is high demand, with little supply. This issue is further complicated by reports of landlords not complying with requests to allow service or emotional support animals, per the IC study.

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

El Paso County's upcoming goal of improving access to public transportation through infrastructure improvements has a threefold benefit. First, it will improve opportunities for families to send their children to choice schools. Second, it will improve employment opportunities by increasing ease of access to public transportation. And third, disabled persons who were previously unable to access bus stops will now have access. These efforts will be especially focused in the Fountain Valley region, which at present has particularly deficient public transportation. Overall, greater access to public transportation equals greater access to opportunities.

3. Contributing Factors of Disparities in Access to Opportunity

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

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

The factors that most significantly contribute to and perpetuate the severity in access to opportunity in the jurisdiction and region are as follows: the availability and frequency of public transportation, lack of regional cooperation, and the location of environmental health hazards. The public survey indicated that the majority of the Urban County residents feel that there is not reliable, affordable transportation between homes and opportunities, and this sentiment is also backed by the data in Map 10. The Transit Trips Index is below 50 in almost every area of El Paso County, not because citizens choose to abstain from public transportation, but rather because the availability is insufficient. The region's lack of cooperation, specifically in terms of public transportation, is especially prevalent in areas where the city's boundaries end and small pockets of unincorporated El Paso County are left with no formal municipal government to support them. Improved service between transportation providers has been a promising update since 2016 but more collaboration is needed to maximize benefit to the community.

Regional factors that create disparities in access to opportunity are not terribly dissimilar from the factors affecting the Urban County. While it is true that Mountain Metro has the best public

transportation available within the region, its failure to meet a variety of work schedules and keep up with the urban sprawl of the city constrains its usefulness. Furthermore, the city has made unsuccessful attempts to coordinate a truly effective transit system with the city of Fountain and non-profits that provide transportation services, such as Silver Key. Improved regional coordination could certainly improve the issues faced by residents of the City of Colorado Springs in terms of access to opportunity.

Environmental health issues do not affect the city of Colorado Springs as significantly as certain areas of the Urban County, although it is a well-known fact that inner areas of the city unsurprisingly have lower air quality than areas on the outer edge. However, this can be mostly attributed to the emissions of vehicles and any ozone that may be created from industrial sites. Since 2016 progress has been made to close/decommission local coal plants and is expected to improve health outcomes for the region as a whole.

iv. Disproportionate Housing Needs

1. Analysis

- a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Overall, Native American households experience the greatest percentage of the four housing problems measured by HUD, as demonstrated on Table 9. To be more specific, out of the 226 Native American households in the Urban County, 103 of those households experienced at least one of the following: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. Though Native American households are only 4% higher than any other group, the White, Non-Hispanic group is also 7.5% lower than the second lowest ethnicity. This puts the disparity between Whites and Native Americans at almost 17%. However, it is important to remember that this data is based on a sample size of less than 400 households, meaning that the issue should be more thoroughly examined before a definitive conclusion is drawn.

When severe housing cost burden or any of the four severe housing problems are taken into account on Tables 9 and 10, Asian or Pacific Islanders are actually the most disproportionately affected race/ethnicity. This is due to the fact that at 41.85%, they are in close second for the percentage of households that are experienced the 4 severe housing problems and they are the highest group at 17.12% for Severe Housing Cost Burden. This statistic is unexpected because in most areas measured by the AFFH tool, Asian or Pacific Islanders measure fairly close to White Non-Hispanics in access to opportunities, including access to proficient schools and low poverty exposure.

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

As seen on Map 6, the area within the Urban County with the highest housing burden is Fort Carson where more than 52% of households in the census tract experience housing burden. The census tract just north of Fort Carson is at almost 66%. This data is derived from ACS data, which tends to be less reliable for rural or transient populations such as military installations. The most integrated area of the Urban County, Security-Widefield, has housing burden that trends below 40%.

Regionally speaking, Colorado Springs has a number of locations within its city limits that have housing burden in excess of 40%. This is particularly true for the south/southeastern area of the city. This trend also coincides with the city's southeastern section having higher concentrations of Black and Hispanic persons. Furthermore, this area of housing burden is also where a higher number of persons of Mexican national origin reside.

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

In reference to Table 9, the majority of households in the Urban County are families with fewer than five people. Despite this, in the analysis of publicly supported housing, the majority of households with children still chose to occupy Project-Based Section 8 or utilize housing choice vouchers. Furthermore, the majority of households in these two categories of housing are families with children. The issue with the Public Housing row of the table is that there is only one public housing option in the Urban County and that is a senior community. For this reason, it appears as if public housing is only 0 to 1-bedroom is that there is a very limited amount of public housing available in the Urban County, and all of it is designed for seniors.

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

Utilizing 2019 US Census Estimates data, a few trends emerge regarding race/ethnicity in the jurisdiction and region of El Paso County. Perhaps most notable is the difference between Asian and Pacific Islanders that arises when the racial/ethnic groups are broken apart, rather than clumped together as they are in the HUD Affirmatively Furthering Fair Housing Tool Maps. While Asians have an owner-occupied rate within 6% of Whites, the Pacific Islander owner-occupied rate is more than 30% lower, and is the lowest of any race. The majority of multi-family housing within El Paso County is located within the city limits of Colorado Springs and the majority of owner-occupied housing units reside in the Urban County and along the fringes of Colorado Springs city limits. The renter-occupied map also reconfirms the fact that the largest concentration of renter-occupied housing in the Urban County is on Fort Carson. Within the City of Colorado Springs, the sections of higher renter-occupied housing also coincide with the concentrations of Hispanic and Black populations.

2. Additional Information

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

Based on 2019 U.S. Census data, the El Paso County jurisdiction and region has three-bedroom units as the most common. This is in direct contrast with the trend of less than 3 people per household, along with the increased need for affordable housing. Furthermore, a map showing the median number of rooms per housing unit reveals that the majority of housing units with more than six rooms are located to the north and west, while units with less than six rooms are located centrally and to the southeast. Lastly, 44.6% of occupied units paying rent have a gross rent that is over 35% of the household income. 30% is widely recognized as the benchmark for the percentage that housing payments should be under. 52% of renting households go into this category. While this is a 2019 estimate, the numbers have been consistently around 50% for the last 5 years. El Paso County renters are cost-burdened with the price of their rents.

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

In 2016, data from local housing authorities, specifically the Colorado Springs Housing Authority (CSHA) and Fountain Housing Authority (FHA), indicate that both have housing choice voucher waitlists that are longer than the actual number of vouchers available. This is particularly troublesome in the case of the CSHA, which has had their wait list closed for a number of years, yet still has more than 3,000 households on their waitlist. It should be noted that CSHA administers its programs on a regional basis, serving all areas of El Paso County, except for those served by FHA.

Since 2016, this situation has not improved. Affordable housing continues to be needed and wait lists for affordable housing vouchers and properties continue to be long and/or closed. The Calhan Housing Authority confirmed during a consultation that they have a waitlist in excess of 2 years for a unit.

3. Contributing Factors of Disproportionate Housing Needs

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

- The availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending Discrimination
- Other

Perhaps the greatest contributing factor to disproportionate housing needs regionally and by jurisdiction, is the great need for more affordable housing units. Specifically, more housing units in a greater range of sizes that are also ADA compliant. As previously discussed, there are a disproportionate number of units available that are three or more bedrooms. However, these units are also usually more expensive than smaller options, and the lack of options can be a barrier for those who live alone, such as the elderly. The exorbitantly long waitlists reported by both housing authorities is also a clear indicator of the shortage. Since 2016, this situation has not improved. Affordable housing continues to be needed and wait lists for affordable housing vouchers and properties continue to be long and/or closed. The Calhan Housing Authority confirmed during a consultation that they have a waitlist in excess of 2 years for a unit.

Also worth noting are the efforts by non-profits such as Brothers Redevelopment to rehabilitate housing and provide emergency assistance. Their programming operates regionally and receives CDBG funding from El Paso County. They consistently utilize all funding granted and have waitlists for their services. While these investments in the region provide another layer of services to those in need of affordable housing, it does not change the fact the overall lack of available units.

Two other forms of public investment that aim to help low- and moderate-income households get into affordable homes come from the El Paso County Housing Authority. The Turnkey Plus Mortgage Program is a down-payment assistance program that provides 4% or 5% soft second mortgages at 0% interest to help homebuyers with closing costs and the down payment. Since it's creation in 2019, the program has assisted 442 homebuyers through \$5,776,956 of assistance.

The Housing Trust Fund is the other avenue that helps citizens with accessing affordable housing by helping developers with gap financing. This revolving loan fund typically provides \$200,000 to \$500,000 at 1% to 3% interest to developers who are looking to build affordable housing within the county. Over the last 5 years, the El Paso County Housing Authority has provided \$3,695,000 in assistance to 9 different projects, helping to bring a total of 925 affordable units to those in need.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

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

According to 2019 US Census Estimates and Table 5, of the 81562 housing units in qualifying Urban County, a total of 700 units are publicly supported housing units. The vast majority of publicly supported housing units are HCV units (506), as well as 40 units of public housing and

154 units of project-based Section 8 units. When looking into the different categories of publicly supported housing, there are trends which show that certain racial/ethnic groups are more likely to be residing in certain categories. HUD Table 6 shows that those of Caucasian descent are the highest percentage users in all publicly supported housing categories. However, the data indicates that certain racial/ethnic groups are more likely to be residing in one category of publicly supported housing than other categories. When looking strictly at race and ethnicity it appears that Whites are more likely to reside in public housing; Blacks are more likely to reside in the HCV program and Hispanics are more likely to reside in project-based Section 8 units.

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

According to 2019 US Census Estimates and Table 6, of the 242,188 residents that reside in the qualifying Urban County, 194,474 (80.3%) are White, 14,352 (5.9%) are Black, 37,751 (15.6%) are Hispanic and 5,598 (2.3%) are Asian or Pacific Islander. When looking at public housing, the percentages stay in the same general direction as the overall population demographics with those who access public housing being 67.5% White, 15% Black, 17.5% Hispanic and 0% Asian or Pacific Islander. With only one Public Housing building with 40 units in El Paso County, one or two families in one direction or another make a big difference, which explains why the percentages accessing Public Housing don't match the population breakdown. However, when looking at the other categories of publicly supported housing, the percentages are even more disproportionate to the overall Urban County demographics. Those utilizing project-based Section 8 units are 48.05% white, 22.73% Black, 28.57% Hispanic and 0% Asian or Pacific Islander. Per the statistics above, Blacks and Hispanics accessing project-based section 8 units are at a higher percentage than the overall demographic statistic. It is also important to note that Hispanics reside in this category at a higher percentage than any other publicly supported housing category. Those utilizing the HCV program are 48.87 % White, 27.55% Black, 20.62% Hispanic and 1.60% Asian or Pacific Islander. Per the statistics above, Blacks and Hispanics accessing project-based section 8 units are at a higher percentage than the overall demographic statistic. It is also important to note that Blacks reside in this category at a higher percentage than any other publicly supported housing category. Furthermore, the majority of publicly supported housing exists within the city limits of Colorado Springs. While this is within the region, it is not within Urban County jurisdiction. This is likely due to the rural nature of much of the qualifying Urban County.

b. Publicly Supported Housing Location and Occupancy

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

In 2016 there were no R/ECAPs within the Urban County jurisdiction. Since 2016 the mapping tool to examine R/ECAPs is no longer supported, and the data is unavailable.

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

In 2016 there were no R/ECAPs within the Urban County jurisdiction. Since 2016 the mapping tool to examine R/ECAPs is no longer supported, and the data is unavailable.

It is also important to note that the majority of publicly supported housing resides within the city limits of Colorado Springs. While this is within the region, it is not within the jurisdiction. This is likely due to the rural nature of much of the qualifying Urban County. El Paso County Housing Authority staff have confirmed that prospective developers almost always want to develop exclusively within Colorado Springs, mostly due to easy utility access.

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

In 2016 there were no R/ECAPs within the Urban County jurisdiction. Since 2016 the mapping tool to examine R/ECAPs is no longer supported, and the data is unavailable.

It is also important to note that the majority of publicly supported housing resides within the city limits of Colorado Springs. While this is within the region, it is not within the jurisdiction. This is likely due to the rural nature of much of the qualifying Urban County.

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

Though the local data is limited, it appears that the majority of publicly supported housing has similar demographic composition.

- (B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

Though local data is limited, in 2016 our document noted that conjunction with Map 6, voucher units are used heavily in the central/southeast area of Colorado Springs. This trend is in line with the concentrations of persons of Black and Hispanic race/ethnicity in the city of Colorado Springs. In terms of the Urban County, most vouchers are used in the Fountain Valley area, however this is closely in line with the urbanization trends in the Urban County, as well as poverty exposure.

- v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other

HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

The HCV program is administered through a scattered site approach, ensuring no concentrations of poverty. The public housing and project-based Section 8 developments' demographics mirror those of the overall populations they are located within. For example, in Table 8 it can be noted that the Silvercrest Villas a project-based Section-8 senior community has a White population of 100%. This development is located in the rural eastern town of Calhan. Calhan has a total population of 704 residents, of which 695, or 98.7%, are White. However, the other public housing and project-based Section 8 developments are located within the city of Fountain and a small pocket of unincorporated El Paso County just north of Fountain. Fountain demographics according to census data show an overall population of about 74.5% White, while the White populations of the developments range from 39.5-67.5 % White. Furthermore, the households with children in the Fountain area make up about 59.2% of the population while the developments show 80.67% of their developments are households with children.

The overall population of El Paso County, Colorado, is roughly 11% 12% disabled. In Table 15, it is depicted that a larger percentage of disabled persons access publicly supported housing. It is important to note that 60% of people living in public housing are disabled and 25.2% of those accessing the HCV program in our jurisdiction are disabled. Project-Based Section 8 vouchers in the jurisdiction report only 7% of their population are disabled. In summary, public housing and the HCV program experience higher rates of utilization by residents with disabilities in relation to their county-wide distribution.

c. Disparities in Access to Opportunity

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

As previously discussed, the majority of publicly supported housing resides within the region in the city limits of Colorado Springs, which is not within the jurisdiction. However, there are a few publicly supported developments within the Fountain Valley area and one senior development in the Town of Calhan, while the majority of services and public transportation resides within the city of Colorado Springs. Since 2016 our program has worked to increase access to fair housing education and transportation for rural County residents, particularly those in eastern El Paso County and municipalities like Calhan. Reducing the disparity has led to an increase in access to services, job corridors and school choice. Additionally, when

planning future publicly supported housing developments, access to opportunity should be considered during the site selection process.

2. Additional Information

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

As previously discussed, those with disabilities trying to access publicly supported housing incur a lengthier process which limits their access to opportunity. While there is significant waitlist for any member of the community access public supported housing, accessible units for those with disabilities are very limited. The limited availability can double or triple the waitlist timeframe. As noted by the Calhan Housing Authority, the wait list for a unit at their housing complex is in excess of 2 years.

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

While much of the previous data discussed access to publicly supported rental housing, the El Paso County Housing Authority supports home purchases through the Turnkey Plus Down Payment Assistance Program. This component is also imperative when looking at fair housing issues in the region. This program also allows residents to access the option of homeownership, while also ensuring that housing choice is opened to them regionally. The program may be utilized throughout El Paso County, including within the city limits of Colorado Springs, so residents have access to areas of opportunity regionally.

Additionally, when analyzing demographic utilization data of the program, it was apparent that those protected by class (race and ethnicity) were able to access the program. For example, of the 375 homebuyers through the first two years of the Turnkey Plus Program, 22.67% were Hispanic. 2019 US Census Data estimates put the Hispanic population at 15.6% of El Paso County. These comparable demographics comparisons are continued throughout the program analysis reports. Down payment assistance is accessible to all homebuyers in El Paso County, regardless of race or ethnicity.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate

Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

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

There are several contributing factors of publicly supported housing location and occupancy. First, it is important to note that there is a significant need for additional publicly supported housing. This can be attributed to not only HUD and census data, but the thousands of current residents on waitlists to access publicly supported housing. When future publicly supported housing is being planned it is important that access to opportunities is considered during the site selection process. This means that factors such as access to adequate infrastructure, transportation, job corridors, public services and proficient schools should all be considered. Furthermore, activities should be undertaken to ensure that current publicly supported housing developments also have access to opportunities. This can be accomplished by improving infrastructure and access to transportation, job corridors, public services, and proficient schools. While much of this can be improved through providing access to improved infrastructure and transportation to areas with job corridors, public services, and proficient schools, it is important to take a two-pronged approach and also undertake activities that improve and bring these opportunities to the areas in which the publicly supported housing is already located. Some of the most successful past CDBG funded projects have been mobile services that essentially are taken to the neighborhoods of those in need. For example, the El Paso County CDBG Program has funded activities that bring health, food and job training mobile services right to outlying areas including Fountain Valley and rural eastern El Paso County—where current publicly supported housing is located.

Regionally, the city of Colorado Springs has much more publicly supported housing in comparison to the Urban County. However, as discussed in the 2016 AFH document, there is still a definitive shortage of affordable and publicly supported housing within the city as well. A particularly troublesome issue for the city of Colorado Springs is the majority of its publicly supported housing is located in the south/southeast area of the city, aligning closely with areas of high housing burden, and concentrations of persons of Black or Hispanic race/ethnicity, as well as higher concentration of persons of Mexican national origin.

D. Disability and Access Analysis

1. Population Profile

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

Geographically, persons with disabilities are not concentrated disproportionately in any area. The areas that persons with disabilities are located is consistent with urbanization trends displayed in earlier maps. There are 3 main pockets of concentration that occur within the Urban County: just north of Colorado Springs along I-25, the Fountain Valley, and the Manitou Springs area. All three areas of concentration are consistent with urbanization trends and do not display a tendency for persons with disabilities to lean towards living in one area over another.

Regionally speaking, there are no differences in concentration of different types of disabilities between the city of Colorado Springs and the Urban County. This statement is also backed by Table 13, which shows that there is no statically significant difference in distribution of disability types between the jurisdiction and region.

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

In reference to Table 14, there are no statistically significant differences between the Urban County and Colorado Springs in reference to the distribution of disabled persons by age. Both distributions are consistent with each other within less than one percent.

As previously discussed, Maps 14 and 15 show disabled distribution to be consistent with urbanization trends throughout the Urban County, but there is one tendency to not. For disabled persons aged 5-17, Manitou Springs and north of Colorado Springs are not areas of concentration. Instead, only south of Colorado Springs in the Fountain area is an area of concentration. However, this map matches the mapping of familial status in Maps 7-13. Most families live in the Fountain area, so that leads to the concentration of children with disabilities that is shown in Map 15.

2. Housing Accessibility

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

Since the 2016 AFH submission, it is apparent that one of the major issues increasing within the region facing the El Paso County jurisdiction and region is a lack of affordable housing. Every single consultation with local stakeholders during our 2021 preparation of this document revealed concerns about the sharp increases in local market rent and housing prices. Many agencies expressed concerns that larger units are being subdivided to make housing more affordable, which in turn increases housing issues such as overcrowding of units.

Furthermore, the majority of affordable housing is not accessible for disabled persons (this is most likely because the majority of affordable housing was built pre-1991). Multiple consultations revealed that as the number of seniors in our region increases, the need for ADA accessible units has increased as well.

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

As previously discussed, there are no R/ECAPs or segregation within the Urban County. Because of this, there are no R/ECAPs that align with areas that are segregated. The mapping tool used to analyze R/ECAPs is no longer available.

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

In reference to Table 15, almost two-thirds of all persons within public housing have a disability, which would suggest that public housing is very much accessible for disabled persons. In contrast, only about 7% of persons living in project-based section 8 housing have a disability, and 25% of persons in the HCV program have a disability. However, it is important to note that these numbers do not consider the number of disabled persons on the wait lists for affordable housing vouchers, who have to usually wait longer for an accessible unit to become available.

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

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

As previously stated, there is no statistically significant data to suggest that there are segregated areas in the Urban County. However, Fountain Valley is an integrated and diverse area, which also coincides where the majority of housing choice vouchers are used, as shown in Map 5.

Regionally, Map 17 shows that there is no evidence of persons with disabilities experiencing segregation within Colorado Springs. If anything, there is strong integration within the urbanized community, and higher populated areas coincide with higher concentrations of disabled persons.

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

While it is true that most affordable housing for disabled persons is in short supply in the Urban County, there are a number of services available to help connect them to their needs. The Independence Center, for example, works as a one stop shop that provides a number of services, most notably housing vouchers specifically for disabled persons to get into accessible affordable housing. Other organizations, such as Brothers Redevelopment, help to rehabilitate housing and make it more accessible utilizing CDBG funds. Additional agencies, such as the city of Fountain, utilize CDBG funds to make sidewalks and other infrastructure more accessible for improve their

transportation options. To improve already existing housing, Emergency Home Repair helps to make home modifications and build wheelchair ramps.

In terms of supportive services, a number of local organizations, such as the Colorado Crisis Services, TESSA, Mental Health America of Colorado, Another Life Foundation, and NAMI Colorado Springs, help to provide guidance and connect disabled persons to services such as therapy, group programs, or emergency support. Depending on the income level of the disabled person, some of these services are provided free or at low cost.

4. Disparities in Access to Opportunity

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

i. Government services and facilities

While El Paso County government buildings provide accommodation for disabled persons, the movement of the El Paso County services to the Citizens Service Center (CSC) in the northwest part of town created an additional barrier for disabled persons to visit, particularly those that live in Fountain Valley. Since 2016, improvements to the transportation system has improved this issue somewhat but it still takes over 3 hours for a residents to complete a trip from Fountain to CSC and back.

It is also important to note that the Rocky Mountain ADA Center, located within Colorado Springs, provides information about the ADA to empower disabled persons and connect them with local resources. While they themselves do not provide advocacy or legal services, they are able act a central hub of information to connect disabled persons to groups that fit their needs.

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

As discussed in the Affordable Housing Assessment, based on the 2012 American Community Survey, there is a need to update aging infrastructure in order to make it ADA compliant. This includes the improvements of sidewalks or adding sidewalks where there are none. For persons with disabilities lacking a sidewalk, particularly in inclement weather, can be a major barrier and even dangerous. Improving accessibility to transportation through improving infrastructure is a future goal of the El Paso County Economic Development Department – a goal intending to use CDBG funds.

iii. Transportation

As has been discussed multiple times throughout this document, the public transportation within the El Paso County region is severely lacking. Since 2016, major improvements to the transportation system have been undertaken, some in part thanks to CDBG funding. That being said, the need for improved access to services continues to be a request from local stakeholders, as revealed in recent consultations. Major issues include a lack of bus services on weekends, as well as little variety in times of service offered. Additionally, an increase in bus routes between

Fountain Valley and Colorado Springs is necessary to make commuting to work easier for those in the Fountain Valley area.

iv. Proficient schools and educational programs

Educational and job training opportunities for in-demand occupations are offered by the Pikes Peak Workforce Center, which also has a number of other disabled-focused services. Unfortunately, proficient school districts in the region do not necessarily offer comparable services for disabled students. While disabled students are eligible for the Section 504 program, in order to enroll in the program, students in District 12 must first go through a Child Find program in order to establish eligibility. Furthermore, District 12 does not offer a bus transportation service, so parents must be able to drive their children to or from work, unless said transportation is covered by their Section 504 plan. For District 20, transportation is offered, but at a price. The fee is only waived if the child is determined to need transportation as part of their individualized education plan, or if there is significant financial hardship.

v. Jobs

A major barrier for disabled persons accessing jobs is a lack of public transportation, which has been previously discussed. Additional barriers between disabled persons and jobs previously included a lack of a workforce center outside of the City of Colorado Springs limits, but that has recently changed. The Pikes Peak Workforce Center now has a satellite location in Fountain, as well as southeastern Colorado Springs by the Security-Widefield area. The Pikes Peak Workforce Center offers computers with disability hardware (such as JAWS or Open Book) as well as TTY devices.

Additionally, the Independence Center now offers satellite offices in Fountain, Monument, and Calhan. These satellite offices immensely improve access to services for persons with disabilities, particularly those who cannot drive and need local access to resources.

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

For reasonable accommodations at proficient schools in the jurisdiction and region, the individuals must contact the school district directly and advocate on behalf of their child's needs. This approach is also similar for employers and educational programs. Advocacy organizations, such as the Independence Center, can assist as needed, but cannot act entirely on behalf of the individual. For disabled persons who have issues with a city or county program, they can contact the ADA/504 Coordinator of each respective government and file a complaint with them. If a disabled person feels they have not been given reasonable accommodation by the ADA/504 Coordinator or any organization, they are also able to file a complaint through the Colorado Department of Regulatory Agencies (DORA), specifically in the Civil Rights Division. Alternately, they can also file their complaint through HUD's Fair Housing and Equal Opportunity (FHEO) department.

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

Perhaps the greatest difficulty facing disabled persons who wish to become homeowners is simply finding a home that accommodates their disabilities. Homes are not required to be ADA compliant, and as such, potential homeowners will find themselves with few to potentially no options for homes that already comply with their needs. Assuming they have the appropriate level of financing available, some homebuyers may turn to new construction in hopes of getting the house built to comply with their disability. While this approach is certainly viable, this idea may be cost prohibitive for some potential homebuyers. Additionally, it would be plausible for some to retrofit the home to their needs, but this option will also not be financially feasible for all persons. This is where local agencies, such as Brothers Redevelopment and their Help for Homes initiative, come into use as they expend their CDBG funding to help disabled residents retrofit homes. These opportunities are not limited by a person's type of disability; any person that falls within their income requirements is eligible. Examples of repair work done include roll-in showers, hearing impaired smoke detectors, and wheelchair ramp installation. The Independence Center also offers home modifications, but generally utilizes Medicaid to fund the retrofitting.

5. Disproportionate Housing Needs

- a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

While the concentration of disabled persons in the eastern half of the Urban County is not significant, there are enough to suggest that disabled persons in the area potentially experience a housing burden in excess of 30%, as shown in Map 6. There does look to be a slight tendency for those with cognitive disabilities to live in the areas of Monument and Black Forest. This may have less to do with where persons of cognitive disabilities want to live and more to do with their support systems live. As stated in the IC Study, persons with cognitive disabilities are often overlooked or their needs ignored because their disability is 'invisible.' The lack of understanding in their disability creates societal barriers as well, as opposed to just physical ones. The problem is further compounded if they have multiple types of disabilities, which makes them especially vulnerable to abuse or neglect at the hands of landlords or financial agencies.

6. Additional Information

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

As discussed in the 2016 AFH document, the need for affordable housing in both the jurisdiction and region is expected to grow. If the supply fails to meet the demand, persons with disabilities suffer disproportionately, as they must wait significantly longer for the opportunity to move into affordable, accessible housing. The IC Study discusses the fact that there are already disabled persons in the community who choose to live in housing units that do not meet their needs and

potentially endangers their safety simply for the sake of living in housing that is within their means.

Disabled persons' access to homeownership can be further limited if they are a Non-White race/ethnicity, particularly Black or Hispanic. The Regional Housing Assessment states that persons of Black or Hispanic race/ethnicity have a disproportionately low percentage of homeownership, and when compounded with the additional barriers experienced by disabled persons, purchasing a home as a Non-White disabled person can become prohibitively difficult. Likewise, if someone is disabled and has Low English Proficiency, getting access to the resources they need can be especially challenging.

- b. The program participant may also describe other information relevant to its assessment of disability and access issues.

As discussed in our 2016 AFH document, disabled persons, especially persons with cognitive disabilities, are at a higher risk of becoming homeless. This is especially true for persons with traumatic brain injuries (TBI) or other trauma-based issues, as they may not have the mental faculties to fully understand their situation, and therefore become unable to help themselves out of it. Our CDBG program continues to seek out opportunities to improve access to opportunities for those with disabilities, to include persons with cognitive disabilities.

7. Disability and Access Issues Contributing Factors

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

- Access to proficient schools for persons with disabilities
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Land use and zoning laws
- Lending Discrimination
- Location of accessible housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities

- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings
- Other

Perhaps the greatest fair housing issue facing the jurisdiction and region is a lack of housing units that are both affordable and accessible. Factors contributing to this include a lack of publicly supported accessible housing and a lack of housing units in a variety of ranges. To put this in perspective, the Calhan Housing Authority currently has a waitlist in excess of 2 years. Nearly every agency consulted during the development of this document confirmed they are deeply concerned about the state of affordable housing within our region. When this is taken into account with the fact that there is already a shortage of affordable housing in the jurisdiction and region, there is little doubt that there is not nearly enough supply of affordable, accessible housing to meet existing demand, let alone future demand.

In a similar vein, another fair housing issue is the lack of infrastructure between housing and public transportation, which perpetuates a disabled person’s reliance on outside resources and only contributes to accessibility issues. While this issue has been addressed through multiple avenues in the last five years, this 2016 issue continues to be an area of concern for our county in 2021.

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

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

In 2016, El Paso County made significant efforts to obtain fair housing complaints filed within the region against landlords/housing developments and financial institutions within the last five years. Information was obtained from the Department of Regulatory Agencies- Colorado Civil Rights Division and the U.S. Department of Housing and Urban Development- Fair Housing and Equal Opportunity. While regional information was obtained, it was unclear how many complaints were within the El Paso County CDBG jurisdiction. Please note below a brief summary of the complaints filed in El Paso County overall.

Colorado Department of Regulatory Agencies (DORA)- Colorado Civil Rights Division (CCRD): Over a three-year period from 2017 to 2019, Colorado Civil Rights Division has received a total of 587 housing charges filed throughout the state of Colorado. Of the complaints filed, the three most common protected classes within housing disputes are physical disabilities, mental disabilities and race. In 2020, 26.7% of all complaints were based on physical disabilities, 16.7% were mental disabilities and 12.2% were race. Most of the other protected classes did

receive complaints, but only color and familial status were over 5%. Of the 587 complaints filed, 92% had a finding of no probable cause. Only a total of 30 cases had a finding of probable cause by the Colorado Civil Rights Division.

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

The Federal Fair Housing Act (Title VIII of the Civil Rights Act of 1968), as amended, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability. The Act covers most types of housing including rental housing, home sales, mortgages as well as land use and zoning. HUD has the primary authority for enforcing the Fair Housing Act.

The State of Colorado also has a state law that prohibits housing discrimination (Colorado Revised Statutes, Title 24, Article 34, Part 5 – Housing Practices). The state law offers the same protections as the Fair Housing Act in addition to providing protections based on marital status, creed, and ancestry. Additionally, refusing to make reasonable accommodations for persons with disabilities or to harass or interfere with a person exercising their Fair Housing rights is prohibited by these laws. The Colorado Civil Rights Division has the authority to enforce the law.

Effective May 29, 2008, the Colorado Anti-Discrimination Act was expanded to include sexual orientation, inclusive of transgender status, to the list of protected classes for housing. Colorado now prohibits discrimination against individuals because they are straight, lesbian, gay, bisexual or transgender (LGBT) in housing rentals, home sales, real estate financing, homeowner associations, and other housing situations.

Effective January 1, 2021, it is also now illegal to discriminate against persons on the basis of their source income in the state of Colorado.

In addition to complying with all applicable federal fair housing laws, rules, and regulations, El Paso County complies with all applicable state laws, rules, and regulations including sections 24-34-401 et seq., 24-34-501 et seq., and 24-34-601 et. seq., of the Colorado Revised Statutes and rules promulgated by the Colorado Civil Rights Commission. Characteristics protected under state law include, but are not necessarily limited to, disability, race, creed, color, sex, sexual orientation, marital status, familial status, religion, national origin, and ancestry.

In summary, it is illegal to discriminate in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on:

- Race
- Color
- National origin
- Religion
- Sex/Gender

- Familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18)
 - Disability or Handicap
 - Marital Status
 - Sexual Orientation
 - Creed
 - Ancestry
 - Source of Income
3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

U.S. Department of Housing and Urban Development (HUD)- Fair Housing and Equal Opportunity (FHEO): The mission of the Office of Fair Housing and Equal Opportunity is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development and public understanding of federal fair housing policies and laws.

Colorado Department of Regulatory Agencies (DORA)- Colorado Civil Rights Division (CCRD): The CCRD is charged with enforcing the State's anti-discrimination laws in the areas of employment, housing, and public accommodations. CCRD works to eliminate and prevent discrimination in these areas through investigation, education, mediation, and enforcement.

Pikes Peak Justice and Peace Commission: The Pikes Peak Justice and Peace Commission educates, advocates, and cultivates peace, justice, and sustainability in the Pikes Peak region.

People's Access to Homes (PATH): PATH is a newly formed community organizing/advocacy group which came from efforts of the Independence Center to advance the cause of housing for all.

El Paso County Attorney's Office: While the El Paso County Attorney's Office does not represent residents in fair housing matters, they do educate staff and enforce fair housing laws for internal program administration purposes.

El Paso County Community Development Block Grant (CDBG) Program: The El Paso County Community Development Block Grant program staff administers and maintains a Fair Housing website on the El Paso County domain. This site not only has a copy of the program's current Assessment of Fair Housing Tool, but also has a list of local and regional fair housing resources and contacts. Additionally, CDBG staff hosts fair housing educational and outreach opportunities and plans to increase these in the coming program years in response to identified fair housing issues in this tool.

4. Additional Information

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

According to the 2016 AFH document, it was recommended that the region engage in public education and outreach to help residents understand that there are costs associated with an undersupply of affordable housing such as lower achievement scores among school-age children, increased traffic congestion, increased commuting times and distance, increased need for road maintenance, less time for volunteer and other civic activities, etc. Additionally, it was recommended that affordable housing developers can help change negative perceptions through quality design that is compatible with existing surrounding neighborhoods. Every effort should be made to ensure that all affordable housing is well-designed, integrated into the neighborhood and effectively managed. Residents are sensitive to affordable housing being located in their neighborhoods due to the fear that affordable housing units will decrease property values. In reality, affordable housing developments that are well-designed, smartly integrated and effectively managed have been shown to enhance property values rather than diminish them. The design and function elements of workforce housing is a topic that El Paso County staff and developers continue to have. Recent developments have ensured that this important component is well thought out and executed.

Since that 2016 AFH document, our program has undertaken biannual fair housing events that improve outreach and availability of fair housing education events for residents. Events were held as follows:

- 2017
 - A fair housing event was held in April 2017 at the Fountain Valley Senior Center. A fair housing presentation was made to a group of 50+ seniors during their lunchtime
 - A fair housing event was held in October 2017 at the Calhan Housing Authority's conference room. Residents of the public housing facility attended the meeting, along with a reporter from the local newspaper who published articles about fair housing following the meeting
- 2018
 - A fair housing booth was hosted in April 2018 at the City of Fountain's city hall. Residents, code enforcement officers, and police officers all stopped by the booth to learn more about fair housing.
 - A fair housing event was held in partnership with Brothers Redevelopment at the Sallie Bush Community Center in Green Mountain Falls, Colorado. Residents were able to stop by and get free fair housing information and materials such as pens and magnets.
- 2019
 - A fair housing meeting was held at the El Paso County Economic Development Office in June 2019. Local stakeholders such as nonprofits and

other governmental agencies were able to attend and learn more about how to protect the fair housing rights of residents.

- A fair housing booth was hosted at the Calhan Health & Education Fair in Calhan, Colorado in September 2019. Residents were able to stop by the booth and learn more about fair housing rights and how to file a fair housing complaint.
- 2020
 - In compliance with state health orders, the April 2020 fair housing event was held virtually on our website. This became the most comprehensive collection of fair housing information we had yet, as it included specialty information for HOAs to comply with fair housing law as well as a focus on non-English translations of fair housing information.
 - In compliance with state health orders, the November 2020 fair housing event was held virtually through Microsoft Teams. This enabled us to provide free closed captioning through the Teams platform. Additionally, we held two events on the same day, to provide multiple opportunities for participation. These meetings were focused on renter's rights due to the pandemic.
- 2021
 - In compliance with state health orders, the April 2021 fair housing event was held virtually through Microsoft Teams. This enabled us to provide free closed captioning through the Teams platform. This event also took place during National Community Development Week and Fair Housing Month. Fair housing information, along with highlights of local community development projects, was part of the presentation.
 - In October 2021, a fair housing presentation was integrated into our 2021 AFH document update comment period. This allowed us to receive more meaningful feedback from the community by simultaneously empowering them with fair housing law knowledge.
- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

El Paso County staff has also broadened their efforts to create an environment for collaboration and cooperation which promotes fair housing outcomes and capacity. This has included conducting meetings with local government planners, developers, and builders to:

- Sensitize participants to affordable housing issues and solutions
- Reach for high quality development that addresses a defined demand
- Advocate for housing and transportation policies to be planned together
- Publish public education materials to inform residents of the need for and the impact of affordable housing on the region
- Participate in a roundtable discussion of best practices.

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

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

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

Since that 2016 AFH document, our program has undertaken biannual fair housing events that improve outreach and availability of fair housing education events for residents. Events were held as follows:

- 2017
 - A fair housing event was held in April 2017 at the Fountain Valley Senior Center. A fair housing presentation was made to a group of 50+ seniors during their lunchtime
 - A fair housing event was held in October 2017 at the Calhan Housing Authority's conference room. Residents of the public housing facility attended the meeting, along with a reporter from the local newspaper who published articles about fair housing following the meeting
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 - A fair housing booth was hosted in April 2018 at the City of Fountain's city hall. Residents, code enforcement officers, and police officers all stopped by the booth to learn more about fair housing.
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 - A fair housing meeting was held at the El Paso County Economic Development Office in June 2019. Local stakeholders such as nonprofits and other governmental agencies were able to attend and learn more about how to protect the fair housing rights of residents.
 - A fair housing booth was hosted at the Calhan Health & Education Fair in Calhan, Colorado in September 2019. Residents were able to stop by the

booth and learn more about fair housing rights and how to file a fair housing complaint.

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- 2021
 - In compliance with state health orders, the April 2021 fair housing event was held virtually through Microsoft Teams. This enabled us to provide free closed captioning through the Teams platform. This event also took place during National Community Development Week and Fair Housing Month. Fair housing information, along with highlights of local community development projects, was part of the presentation.
 - In October 2021, a fair housing presentation was integrated into our 2021 AFH document update comment period. This allowed us to receive more meaningful feedback from the community by simultaneously empowering them with fair housing law knowledge.

Moving forward, our CDBG program will continue to focus efforts on the education of residents and local resource agencies to empower the community with knowledge of their federally (and state) protected rights.

VI. Fair Housing Goals and Priorities

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Fair Housing Issue #1: There is a lack of affordable, accessible transportation which limits access to opportunities and housing choice and disproportionately affects persons with disabilities. Prioritized factors that contribute to this issue are:

#1: The availability, type, frequency, and reliability of public transportation: The region is lacking robust public transportation infrastructure. Only two of the eight municipalities within the region have a public transit system. Those systems lack connections and a schedule that allows for residents to have access to opportunities.

#2: Access to transportation for persons with disabilities: There is inadequate public infrastructure which would allow persons with disabilities to safely access public transit, jobs, housing, medical services, schools, and leisure activities.

#3: Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure: There is inadequate public infrastructure which would allow persons of all protected classes to safely access public transit, jobs, housing, medical services, schools, and leisure activities.

#4: Lack of regional cooperation: There are inadequate connections between municipally operated public transit systems. While there is an agency- Pikes Peak Area Council of Governments (PPACG) that coordinates a regional transportation improvement program, the entire Urban County jurisdiction does not participate in the program. However, the PPACG efforts provide a solid foundation when looking to increase regional cooperation on transportation issues. Furthermore, El Paso County applauds the PPACG goal to ensure transportation system investment benefits are equitably distributed to minorities, and citizens with disabilities, low incomes and/or other needs. These efforts continue to affirmatively further fair housing within the region.

This issue will be addressed by improving access to transportation services and infrastructure, removing impediments to mobility, and increasing access to opportunities. This can be done by increasing additional public transportation options, as well as improving infrastructure throughout a variety of areas within the county which will allow for more multimodal access to additional opportunities. Since the 2016 AFH documentation, multiple corridors have been improved. However, much more work is still needed to truly make transportation more equitable and accessible throughout the region.

Fair Housing Issue #2: A county-wide shortage of affordable, accessible housing units which limits access to opportunities and housing choice and disproportionately affects classes protected by fair housing law. Contributing factors are:

#1: Location and type of affordable housing: There are substantial waitlists for all publicly supported housing. Additionally, El Paso County could benefit from more housing choices throughout the jurisdiction.

#2: The availability of affordable units in a range of sizes: Due to changing demographics, there is increased need for smaller, affordable housing units in a variety of locations.

#3: Impediments to mobility: Inability to move to a neighborhood or area of choice, due to lack of available, accessible, affordable units. A shortage of units and Housing Choice Vouchers limits mobility.

#4: Location of accessible housing: Due to a shortage of accessible housing, choices are limited for persons with disabilities.

#5: Location of employers: Areas of the County have low job proximity due to the overall size and geographic nature of the region.

#6: Location of proficient schools and school assignment policies: Proficient schools are disproportionately concentrated in the north and west regions of the County.

#7: Location of environmental health hazards: Decreased air quality on Fort Carson, combined with potential PFC water quality issues in the Fountain Valley, create less environmentally healthy neighborhoods.

This issue will be addressed with El Paso County assistance in the development of additional publicly- supported affordable housing units in areas of opportunity. This may be done through CDBG funding, Private Activity Bond allocation, El Paso County Housing Authority Housing Trust funds or assistance with obtaining federal and state low-income housing tax credits. Since the 2016 AFH document, this goal has been mostly met through the El Paso County Housing Authority, but our CDBG funding will continue to remain an option as future opportunities arise.

Fair Housing Goal #3: A lack of resources to ensure there are adequate accessible units to meet current and future needs. Prioritized factors that contribute to this issue are:

#1: Lack of assistance for housing accessibility modifications: There are a minimal number of agencies that offer housing accessibility modifications and, when offered, it is usually income restricted.

#2: Lack of affordable, accessible housing in a range of unit sizes: Due to changing demographics, there is increased need for smaller, affordable housing units in a variety of locations.

#3: Impediments to mobility: Inability to move to a neighborhood or area of choice, due to lack of available, accessible, affordable units. A shortage of units and Housing Choice Vouchers limits mobility.

This issue will be addressed by committing additional federal and other funds to the rehabilitation of pre-existing housing inventory to increase affordable, accessible housing choices.

Fair Housing Goal #4: The lack of understanding of federal, state, and local fair housing laws has resulted in the presence of housing discrimination in the region. Contributing factors are:

#1: Lack of resources for fair housing agencies and organizations: There is a lack of agencies that produce activities which: test, enforce, coordinate, and advocate about fair housing laws.

#2: Quality of affordable housing information programs: Agencies that perform these activities have limited resources to ensure all needs are met.

#3: Lack of local public fair housing enforcement: In a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development-Fair Housing and Equal Opportunity and the Department of Regulatory Agencies-Colorado Civil Rights Division, it was discovered that most complaints filed related to disability discrimination. Furthermore, most

complaints resulted in no probable cause findings, which could be due to lack of evidence or education.

#4: Lack of local private fair housing outreach and enforcement: Lack of agencies in the area that provide these services which can result in underreporting.

#5: Private discrimination: In a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development-Fair Housing and Equal Opportunity and the Department of Regulatory Agencies-Colorado Civil Rights Division, it was discovered that private discrimination is occurring within the region.

This issue will be addressed by continuing fair housing education, outreach, and enforcement. The El Paso County CDBG program will continue to take on the responsibility of coordinating semi-annual education and outreach opportunities.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant</u>
<p><u>AFH Goal #1:</u> Improve access to transportation services and infrastructure, remove impediments to mobility and increase access to opportunities</p>	<p>#1: The availability, type, frequency, and reliability of public transportation</p> <p>#2: Access to transportation for persons with disabilities</p> <p>#3: Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure</p> <p>#4: Lack of regional cooperation</p>	<p>Lack of affordable, accessible transportation which limits access to opportunities and disproportionately affects persons with disabilities</p>	<p>Utilize CDBG allocation to annually fund one activity per year related to transportation accessibility which will serve to strengthen regional collaboration and transportation connections that increase access to opportunity. The final milestone will be assisting 500 people with improved access to transportation by the end of the 2026 program year.</p>	<p>El Paso County</p>
<p>Discussion:</p> <p>Contributing factors are prioritized numerically one to four, number one being the most detrimental contributing factor to the fair housing issue.</p> <p>This goal will mitigate the fair housing issue by reducing barriers for persons with disabilities and increasing access to opportunities for all residents. Disabled and other protected classes will have greater access to housing choices when transportation services and infrastructure are improved.</p>				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant</u>
<p><u>AFH Goal #2:</u> Assist in the development of additional publicly-supported affordable housing units in areas of opportunity</p>	<p>#1: Location and type of affordable housing</p> <p>#2: The availability of affordable units in a range of sizes</p> <p>#3: Impediments to mobility</p> <p>#4: Location of accessible housing</p> <p>#5: Location of employers</p> <p>#6: Location of proficient schools and school assignment policies</p> <p>#7: Location of environmental health hazards</p>	<p>County-wide shortage of affordable, accessible housing units which limits access to opportunities and disproportionately affects classes protected by fair housing laws</p>	<p>Facilitate activities that assist in the development of additional affordable housing units.</p> <p>The final milestone would be to assist with the development of 100 units by the end of the 2026 program year. Special attention will be made to ensure that these units are in environmentally healthy neighborhoods with greater access to opportunities.</p>	<p>El Paso County</p>
<p>Discussion:</p> <p>Contributing factors are prioritized numerically one to seven, number one being the most detrimental contributing factor to the fair housing issue.</p> <p>This goal will mitigate the fair housing issue by increasing the availability publicly supported housing which tends to disproportionately serve, according to HUD-released data and local data sets, several of the different protected classes under fair housing law. In addition, focus will be made to ensure the development of new units is within areas that have better access to opportunities.</p>				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant</u>
<p><u>AFH Goal #3:</u> Rehabilitation of pre-existing housing inventory to increase affordable, accessible housing choices</p>	<p>#1: Lack of assistance for housing accessibility modifications</p> <p>#2: Lack of affordable, accessible housing in a range of unit sizes</p> <p>#3: Impediments to mobility</p>	<p>Lack of resources to ensure there are enough accessible units to meet current and future needs</p>	<p>Utilize CDBG allocation to annually fund activities that rehabilitate income-eligible, owner-occupied housing and publicly-supported housing to increase the number of accessible units. The final milestone would be to rehabilitate 25 units by the end of the 2021 program year.</p>	<p>El Paso County</p>
<p>Discussion:</p> <p>Contributing factors are prioritized numerically one to three, number one being the most detrimental contributing factor to the fair housing issue.</p> <p>This goal will mitigate the fair housing issue by increasing accessible housing stock to improve housing choice for persons with disabilities. This will also help with the future predicted need based on regional demographics.</p>				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant</u>
<p><u>AFH Goal #4:</u> Increase fair housing education, outreach, and enforcement</p>	<p>#1: Lack of resources for fair housing agencies and organizations</p> <p>#2: Quality of affordable housing information programs</p> <p>#3: Lack of local public fair housing enforcement</p> <p>#4: Lack of local private fair housing outreach and enforcement</p> <p>#5: Private discrimination</p>	<p>The lack of understanding of federal, state, and local fair housing laws has resulted in the presence of housing discrimination within the region.</p>	<p>El Paso County CDBG staff will regionally coordinate semi-annual fair housing outreach and educational opportunities.</p> <p>The final milestone would be to coordinate provide fair housing education to 500 people by the end of the 2026 program year.</p>	<p>El Paso County</p>
<p>Discussion:</p> <p>Contributing factors are prioritized numerically one to five, number one being the most detrimental contributing factor to the fair housing issue.</p> <p>This goal will mitigate the fair housing issue by providing education, outreach, and enforcement to reduce housing discrimination. Improving education will help all parties understand their rights and responsibilities, including when and how to file complaints.</p>				

