City of Loveland

AGENDA

TUESDAY, MARCH 24, 2026
6:00 PM - LOVELAND CITY COUNCIL SPECIAL MEETING
CITY COUNCIL CHAMBERS
500 EAST THIRD STREET
LOVELAND, COLORADO

Notice:
Regular meetings of the City Council are held on the 1st and 3rd Tuesdays of each month in the City Council Chambers. Study Sessions are held on the 2nd and 4th Tuesdays of each month in the City Council Chambers.

City Council members may participate in this meeting via electronic means pursuant to their adopted policies and protocol.

How to View this Meeting:



Meetings are open to the public and can be attended in-person by anyone.



Meetings are televised live on:

- Pulse TV Channel 16
- Comcast Channel 16/880



Meetings are available through Zoom by PC, laptop or phone:

- Webinar ID: 975 3779 6504
- Passcode: 829866
- 1 (719) 359-4580



Meetings are livestreamed on the City's website. You can find the link here: lovgov.org/tv

You can also now search Loveland TV on Apple TV and Roku.

Public Comment:

There are in-person and remote options for members of the public who would like to participate in Council meetings.

1. In-Person:

General Public Comment:

- Members of the public can speak to any item that is NOT an ordinance on the regular agenda. Members may also request that any item on the Consent Agenda labeled as quasi-judicial, be placed on the Regular Agenda for discussion and public comment or testimony.

- Individuals who wish to speak are asked to fill out a card provided in Chambers and give this to

the City Clerk. The Mayor will call people up to comment in the order the cards were received. Cards are only required for the general public comment portion of the meeting. Each person will have three minutes to speak. Public comment is limited to residents of Larimer County, and individuals who own property or have business interests in the City.

- Individuals who wish to speak in-person but did not fill out a card may have a chance to comment once all in-person and online speakers who have registered are called on, if there is any time remaining. General Public Comment is limited to 60-minutes.

Regular Agenda Items:

- No cards are required for individuals wanting to provide public comment on items included on the Regular Agenda.

- If an individual comments on a Resolution item shown on the Regular Agenda during General Public Comment, no additional comment can be given once the item comes up for discussion on the Regular Agenda.

- Once a motion is made on an item shown on the Regular Agenda, the Mayor will ask for public comment. The Mayor will invite speakers to comment at that time. In-person comment will occur first, followed by online public comment.

2. Remote:

- Members of the public who wish to provide public comment remotely, can log in using the meeting ID provided above, or opening your meeting app or accessing the web browser and entering the Meeting ID shown above after 5:45 pm, at which time you will be muted and added to the meeting.

- Members of the public can also call 1 (719) 359-4580 and enter the meeting ID when prompted: 97537796504# followed by the meeting passcode: 829866#. If you would like to speak during public comment, please press *9. The moderator will call on the users' last 4 digits of the phone number, and you will press *6 when called on by the moderator.

General Public Comment:

- Members of the public can speak to any item that is NOT an ordinance on the regular agenda. Members may also request that any item on the Consent Agenda labeled as quasi-judicial, be placed on the Regular Agenda for discussion and public comment or testimony.

- Remote Individuals who wish to speak are asked to register online at lovgov.org/CouncilPublicComment by 12:00 noon on the day of the meeting. The Mayor will call on people to comment in the order the registrations were received. This will follow in-person comment. Online registration is only required for the General Public Comment portion of the meeting.

- To speak to an agenda item when public comment is called for, please choose the raise your hand feature on the application. The moderator will then individually unmute the speaker and the speaker will need to follow the moderator's instructions before making comment. This will include turning on video. Each person will have three minutes to speak. The line will be muted at the end of the three minutes. Public comment is limited to residents of Larimer County, and individuals who own property or have business interests in the City.

- Individuals who wish to speak remotely but did not register may have a chance to comment once all in-person and online speakers who have registered are called on, if there is any time remaining. General Public Comment is limited to 60-minutes.

Regular Agenda Items:

- No online registration is required for individuals wanting to provide public comment on items included on the Regular Agenda.

- If an individual comments on a Resolution item shown on the Regular Agenda during General Public Comment, no additional comment can be given once the item comes up for discussion on the Regular Agenda.

- Once a motion is made on an item shown on the Regular Agenda, the Mayor will ask for public comment. The Mayor will invite speakers to comment at that time. In-person comment will occur first, followed by online public comment.

3. Members of the public wishing to have their comments emailed to City Council and published in the agenda packet may use the form provided at the link below. Comments sent to City Council before 12 p.m. on the Thursday prior to the regular or special meeting will be included in the agenda packet. Comments provided after such time or at the meeting will be posted in the agenda packet after the meeting. https://www.lovgov.org/city-government/city-council/city-council-meetings/city-council-public-comment-form

Notice of Non-Discrimination
It is the policy of the City of Loveland to provide equal services, programs and activities without regard to race, color, national origin, creed, religion, sex, sexual orientation, disability, or age and without regard to the exercise of rights guaranteed by state or federal law. It is the policy of the City of Loveland to provide language access services at no charge to populations of persons with limited English proficiency (LEP) and persons with a disability who are served by the City.
For more information on non-discrimination or for translation assistance, please contact the City's Title VI Coordinator at TitleSix@cityofloveland.orgor 970-962-2372. The City will make reasonable accommodations for citizens in accordance with the Americans with Disabilities Act (ADA). For more information on ADA or accommodations, please contact the City's ADA Coordinator atADACoordinator@cityofloveland.orgor 970-962-3319.

Notificación en contra de la discriminación
La política de la Ciudad de Loveland es proveer servicios, programas y actividades iguales sin importar la raza, color, origen nacional, credo, religión, sexo, orientación sexual, discapacidad, o edad y sin importar el uso de los derechos garantizados por la ley estatal o federal. La política de la Ciudad de Loveland es proveer servicios gratis de acceso de lenguaje a la población de personas con dominio limitado del inglés (LEP, por sus iniciales en inglés) y a las personas con discapacidades quienes reciben servicios de la ciudad.
Si desea recibir más información en contra de la discriminación o si desea ayuda de traducción, por favor comuníquese con el Coordinador del Título VI de la Ciudad en TitleSix@cityofloveland.orgo al 970-962-2372 . La Ciudad hará acomodaciones razonables para los ciudadanos de acuerdo con la Ley de Americanos con Disca pacidades (ADA, por sus iniciales en inglés). Si desea más información acerca de la ADA o acerca de las acomodaciones, por favor comuníquese con el Coordinador de ADA de la Ciudad enADACoordinator@cityofloveland.orgo al 970-962-3319.

Title VI and ADA Grievance Policy and Procedures can be located on the City of Loveland website at: cityofloveland.org

Password to the public wireless network (colguest) is accesswifi

1. SPECIAL MEETING

1.1. INTRODUCTION

(6:00) **1.2. CALL TO ORDER**

1.3. PLEDGE OF ALLEGIANCE

1.4. ATTENDANCE REPORT OUT

1.5. PROCLAMATION - CRIME VICTIMS' RIGHTS WEEK

Ashley Stevenson

Crime Victims' Rights Week Proclamation 2026

2. PRESENTATIONS

2.1. COMMUNITY PARTNERSHIP OFFICE

(presenter: Alison Hade and Mollie Fitzpatrick, Root Policy Research)

PRESENTATION OF THE HOUSING NEEDS ASSESSMENT

This item is informational. There is no recommended City Council action from staff

The purpose of this item is to present the findings of the state mandated regional Housing Needs Assessment, completed by Root Policy Research, to give the City a better understanding of current and future housing needs as required under Colorado SB24 174. Although jurisdictions may complete their own assessments, the regional approach offers the advantage of coordinated municipal and county planning and provides shared data that reflects housing concerns extending across community boundaries.

The Assessment shows that Larimer County as a whole needs 3,394 additional housing units to catchup from underproduction and 14,502 units to keep up with projected growth. It also documents shifts in housing production and housing types, evaluates housing stability through the share of income households must spend to remain housed, and outlines the level and mix of housing needed to support a balanced market.

In addition to the countywide findings, the Assessment includes Loveland specific recommendations that will be explored in greater depth through the upcoming Housing Action Plan that will be scheduled for presentation to City Council later this year.

AIR-102833
Att 1 Presentation
Att 2 Housing Needs Assessment Executive Summary
Att 3 Housing Needs Assessment
Att 4 Full Presentation Slides

2.2. DEVELOPMENT SERVICES **(presenter: Kerri Burchett and Tyler Quinn-Smith, Framework)**

PRESENTATION REGARDING PROPOSITION 123 AFFORDABLE HOUSING AMENDMENTS

This item is informational. There is no recommended City Council action from staff

The purpose of this item is to update City Council on efforts needed to comply with Proposition 123, which is the voter approved initiative that created the State Affordable Housing Fund. City Council opted-in to the program by adopting Resolution #134-2023 in October of 2023 and as part of the requirements, an expedited review process must be established for qualifying affordable housing development applications.
AIR-102832
Att 1 Resolution Opting in to Proposition 123
Att 2 Code Audit and Update Strategy Summary
Att 3 Draft Flowchart for Expedited Review Process
Att 4 Presentation Slides

2.3. PUBLIC WORKS **(presenter: AnnaRose Cunningham)**

PRESENTATION REGARDING PASSENGER RAIL STUDY

This item is informational. There is no recommended City Council action from staff

The purpose of this item is to update Loveland City Council on the status of Front Range Passenger Rail (FRPR), its different planning efforts and outline who is leading them. The goals of this presentation include creating awareness around the different elements of this project, garner feedback on the efforts, and identify a Loveland spokesperson for the FRPR District's outreach efforts.
AIR-102839
Att 1 Presentation
Att. 2 Loveland FRPR Memo

2.4. CITY MANAGER'S OFFICE **(presenter: Police Chief Doran, Judge Edgley and Vince Junglas)**

PRESENTATION REGARDING THE RULE OF FOUR SCORECARD REQUEST ON LOVELAND POLICE DEPARTMENT AND MUNICIPAL COURT DATA

As this is an information only item, there is no recommended City Council action from staff

The purpose of this item is to bring forward the Rule of Four Scorecard presentation requested by Councilmember Light-Kovacs per the Rule of Four process from February 3, 2026. The Scorecard outlines background information, options for Council consideration, implementation requirements, and estimated staffing and budget and impacts to the City.
AIR-102841
Att 1 Rule of Four Scorecard (Police & Courts)
Att 2 Rule of Four Scorecard (Municipal Court)

2.5. COMMUNITY PARTNERSHIP OFFICE **(presenter: Alison Hade)**

PRESENTATION REGARDING THE RULE OF FOUR SCORECARD REQUEST ON SANCTIONED CAMPING

As this is an information only item, there is no recommended City Council action from staff

The purpose of this item is to bring forward the Rule of Four Scorecard presentation requested by Councilmember Swanty on February 4, 2026. The scorecard outlines potential options related to sanctioned camping, including risks, costs, benefits, and operations.
AIR-102831
Att 1 Rule of Four Scorecard: Camping

2.6. CITY MANAGER'S OFFICE **(presenter: Kara Kish and Vince Junglas)**

PRESENTATION REGARDING THE RULE OF FOUR SCORECARD REQUEST ON LAKE LOVELAND SWIM BEACH

As this is an information only item, there is no recommended City Council action from staff

The purpose of this item is to bring forward the Rule of Four Scorecard presentation requested by Councilmember Cortez per the Rule of Four process from December 16, 2025. The Scorecard outlines background information, options for Council consideration, implementation requirements, and estimated staffing and budget and impacts to the City.
AIR-102838
Att 1 Rule of Four Request
Att 2 Rule of Four Scorecard on the Lake Loveland Swim Beach
Att 3 Memo from the City Manager - May 2025
Att 4 Lease Agreement with Lake Loveland Recreation Club - 2023

3. PROCEDURAL INFORMATION

This meeting is subject to and incorporates by reference this evening's City of Loveland Agenda including without limitation all policies, rules, and procedural and legal statements therein.

Anyone using the phone number or meeting ID and link at the front of the agenda must be a Larimer County resident or an individual who owns property or has a business interest in the City. The caller should choose the raise your hand feature or press *9 to let the moderator know you wish to speak.

Anyone making an in-person comment during any portion of tonight's meeting should come forward to a microphone. Please do not interrupt other speakers. Side conversations should be moved outside the Council Chambers. Comments will be limited to no more than three minutes, the City Clerk will start the timer once an introduction is made and a buzzer will sound when the three minutes have expired.

Please identify yourself and your city of residence.

4. PUBLIC COMMENT

Anyone who wishes to speak may address the Council at this time. Only residents of Larimer County, persons owning property in Loveland, or persons with a stated business interest in Loveland shall participate in Public Comment.

Public Comment is intended to provide citizens with an opportunity to address Council directly. We encourage speakers to give public comment in a manner that promotes civil discourse. Generally, Council will not respond to public comment other than to seek clarification of the matter raised and defer such matter to the City manager for review and resolution.

5. AGENDA

5.1. WATER & POWER (presenter: Jim Lees)

RESOLUTION AMENDING THE 2026 SCHEDULE OF UTILITY RATES, CHARGES, AND FEES TO IMPLEMENT A RATE FOR THE ELECTRIC TRANSMISSION VOLTAGE SERVICE CUSTOMER CLASS, AND SUPERSEDING ALL PRIOR RESOLUTIONS ESTABLISHING SUCH RATES, CHARGES, AND FEES

A motion to adopt, on second reading, Resolution #R-12-2026 amending the 2026 schedule of utility rates, charges and fees to implement a rate for the Electric Transmission Voltage Service Customer Class, and superseding all prior Resolutions establishing such rates, charges, and fees

The purpose of this proposed Resolution is to establish a rate for the Electric Transmission Voltage Service (Schedule TS) customer class. Currently, there is one customer that is in this rate class, and the rate they are currently being charged is defined in a service agreement that expires on March 31, 2026. Utilities staff and the current customer discussed the expiration of the legacy contract date in 2023, and as the current expiration approached, staff engaged in further communication with the customer prior to first reading to inform them of the needed changes and the associated transition to this new rate as of April 1, 2026.

On February 18, 2026, the Loveland Utilities Commission voted unanimously (8-0) to support staff's recommendation and further recommend that the City Council approve this Resolution.

On March 3, 2026, the City Council voted 8-0 in favor of Resolution #R-12-2026. While City Resolutions typically require only one reading, Loveland Municipal Code Section 13.02.110 specifically mandates that Resolutions establishing utility fees, rates and charges be adopted over two readings. This procedural requirement ensures that changes to the City's utility rate structures undergo a rigorous public process, including a formal public hearing, mirroring the transparency of the ordinance adoption process.
AIR-102835
Resolution
Att 1 Staff Presentation

5.2. LOVELAND FIRE RESCUE AUTHORITY (presenter: Sarah Winter)

ORDINANCE REPEALING AND REENACTING CHAPTER 15.28 OF THE LOVELAND MUNICIPAL CODE AND ADOPTING BY REFERENCE THE LOVELAND FIRE RESCUE AUTHORITY WILDFIRE RESILIENCY CODE, 2026 EDITION

A motion to approve, on first reading, Ordinance No. 6822 repealing and reenacting chapter 15.28 of the Loveland Municipal Code and adopting by reference the Loveland Fire Rescue Authority Wildfire Resilience Code, 2026 Edition

On September 16, 2025, City Council adopted the 2024 IFC via Ordinance No. 6787. However, the adoption process did not include certain notices and a public hearing, required under C.R.S. §31-16-203. So, the purpose of the proposed ordinance will repeal and re-adopt the 2024 IFC. Likewise, this item will repeal the 2021 Loveland Fire Rescue Authority Appendix O, of the 2021 International Fire Code (IFC). The updated code before Council (2026 LFRA Wildfire Resiliency Code) reflects a combination of LFRA's existing wildfire risk reduction code (Appendix O) and the 2025 Colorado Wildfire Resiliency Code.

AIR-102817
Ordinance
Att 1 Presentation
Att 2 LFRA Resolution No. R-181

5.3. CITY CLERK'S OFFICE (presenter: Ashley Macdonald)
ORDINANCE OF THE CITY OF LOVELAND TO ESTABLISH THE AD HOC COMMUNITY HOMELESSNESS TRANSITION COMMITTEE

A motion to adopt on first reading, Ordinance No. 6823 of the City of Loveland to establish the Ad Hoc Community Homelessness Transition Committee

The purpose of this Ordinance is to create a Committee. The Committee's purpose is to convene local nonprofits and faith-based partners to develop sustainable solutions that reduce homelessness, and to evaluate service capacity, models, and potential City support for these efforts.

AIR-102843
Ordinance
Att 1 Presentation

6. ADJOURN

City of Loveland

Proclamation

WHEREAS, the 2026 National Crime Victim Rights Act Theme is: Listen. Act. Advocate. Protect victims, serve communities; and

WHEREAS, the impact of crime on individuals, families, and our entire community is profound, and we must **Listen** to the lived experiences of survivors as they navigate the complex path toward healing and justice; and

WHEREAS, honoring the rights of victims—including the right to be heard and treated with fairness, dignity, and respect—is essential to our mission to **Act** to maintain trust in our systems and our community; and

WHEREAS, a resilient community is built on the strength of its support networks, where we **Advocate** for those in need and ensure every member plays a role in providing access to essential resources; and

WHEREAS, victim advocates, service providers, and volunteers work tirelessly side-by-side to **Protect victims and serve communities**, creating a continuum of support that ensures no survivor has to face the aftermath of crime alone; and

WHEREAS, National Crime Victims' Rights Week provides an opportunity to recommit to a trauma-informed and inclusive response that assists all victims and survivors of crime throughout the year.

NOW, THEREFORE, we, the City Council of Loveland, do hereby proclaim the week of April 19 - 25, 2026, as

CRIME VICTIMS' RIGHTS WEEK

in the City of Loveland, and reaffirm our dedication to a justice system that listens, acts, and advocates for every victim and survivor.

Signed this 24th day of March, 2026.

Patrick McFall,
Mayor

MEETING DATE: March 24, 2026
TO: City Council
DEPARTMENT: Community Partnership Office
DIRECTOR: Rod Wensing
PRESENTER: Alison Hade, Mollie Fitzpatrick
STRATEGIC PLAN FOCUS AREA: Livability

City of Loveland

AGENDA ITEM:
PRESENTATION OF THE HOUSING NEEDS ASSESSMENT

RECOMMENDED CITY COUNCIL ACTION:
This item is informational. There is no recommended City Council action from staff.

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	N/A
Deny the motion or take no action	N/A
Adopt a Modified Action	N/A
Refer back to Staff	N/A

SUMMARY:

Purpose: The purpose of this item is to present the findings of the state mandated regional Housing Needs Assessment, completed by Root Policy Research, to give the City a better understanding of current and future housing needs as required under Colorado SB24 174. Although jurisdictions may complete their own assessments, the regional approach offers the advantage of coordinated municipal and county planning and provides shared data that reflects housing concerns extending across community boundaries.

The Assessment shows that Larimer County as a whole needs 3,394 additional housing units to catchup from underproduction and 14,502 units to keep up with projected growth. It also documents shifts in housing production and housing types, evaluates housing stability through the share of income households must spend to remain housed, and outlines the level and mix of housing needed to support a balanced market.

In addition to the countywide findings, the Assessment includes Loveland specific recommendations that will be explored in greater depth through the upcoming Housing Action Plan that will be scheduled for presentation

to City Council later this year.

Objective: The objective is to satisfy the State of Colorado's requirement to complete a Housing Needs Assessment by December 31, 2026, ensuring Loveland remains in full compliance with SB24 174 while establishing a foundation for future housing policy and planning decisions.

Impact: The impact of this presentation can be found in the recommendations in Section IX.

Council Follow-up: Staff will provide return to Council at a later date with the Loveland Housing Action Plan that must be adopted by Council Resolution.

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A
	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	N/A

STRATEGIC PLAN FOCUS AREA

Focus	Livability
Strategy (if applicable)	Strive to Ensure Opportunity is Available to All
Priority (if applicable)	Affordable and Attainable Housing
Notes	The City continues to build robust and productive community collaborations to increase housing opportunities, invest in the creation of affordable and attainable housing and works to ensure our Municipal Code supports viable, creative options for shelter.

COUNCIL OR BOARD/COMMISSION REVIEW:
Type of Meeting: Affordable Housing Commission

Date of Meeting: March 12, 2026

Resulting Vote: The meeting was informational. No vote was taken

Discussion: TBD

BACKGROUND:

History:
The State of Colorado requires all municipalities to complete a Housing Needs Assessment as part of its effort to address housing affordability, housing needs by income and dwelling type, job availability, displacement vulnerability, and changing demographic trends across the state. This item will provide an overview of the regional assessment prepared in conjunction with Larimer County and the City of Fort Collins by Root Policy Research.

The Housing Needs Assessment **(Attachment 3)** summarizes key data, emerging challenges, and opportunities identified through this process. The findings provide recommendations specific to Loveland and present a picture of current and projected housing needs, including gaps in affordability, availability, and housing types. It also establishes the foundation for future policy discussions and strategic actions City Council may consider as we work to ensure that Loveland's housing stock supports residents, employers, and long-term community vitality. The Housing Needs Executive Summary **(Attachment 2)** summarizes key findings.

The City of Loveland, Larimer County, and the City of Fort Collins collaborated on this regional assessment to complete the state required report. The process included county-wide resident and business surveys, additional stakeholder input, and a resident focus group. See Section VI/Attachment 2 for more information about the process.

The attached Housing Needs Assessment provides extensive data in six chapters, including demographic trends, economic trends, housing inventory, housing market trends, housing problems and displacement risk, and housing needs. Data pulled from the assessment was presented to the Larimer Board of County Commissioners on March 2, 2026, and the Fort Collins City Council on March 10, 2026. Those presentations include extensive data and can be found as **Attachment 4**. **Attachment 1** is the presentation for this action and includes less data because of time constraints.

Outreach and Notification Efforts: Loveland specific outreach included:
• Resident survey was available from September 22nd to November 21st.
• Business survey was available from October 7th to November 21st via economic development offices, chambers of commerce, and local business organizations.
• A Loveland Community Meeting was on October 11th at the Loveland Public Library
Additional outreach occurred at other locations throughout the county.

Conditions met/or anticipated: N/A

Start and End Dates (of studies, design, construction, or in service/operational): N/A

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Att 1 Presentation
Att 2 Housing Needs Assessment Executive Summary
Att 3 Housing Needs Assessment
Att 4 Full Presentation Slides



City of Loveland

Regional Housing Needs Assessment

Alison Hade, CPO Manager;
Mollie Fitzpatrick, Managing Director/Root Policy Research

Community Partnership Office

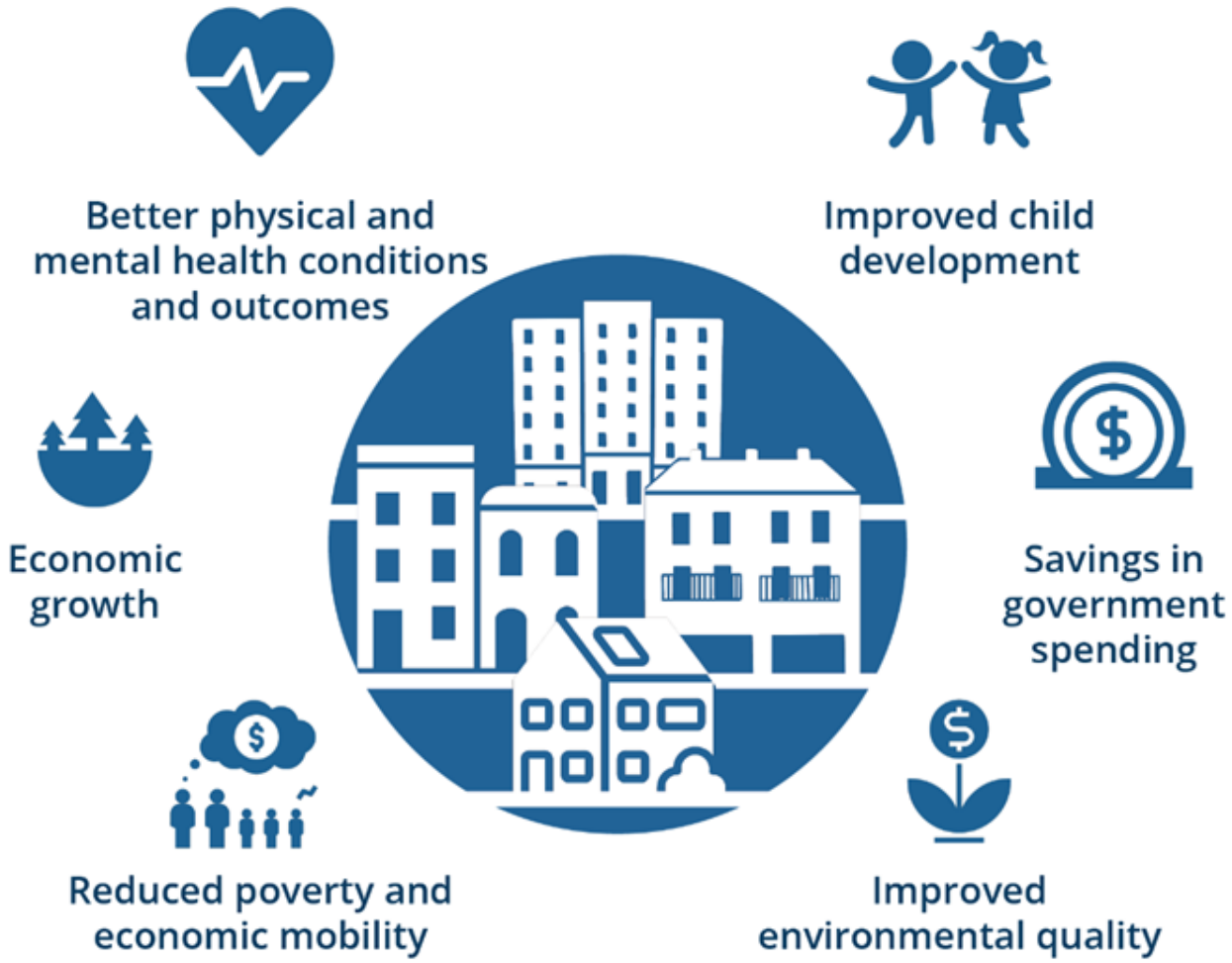
March 24, 2026

Agenda

- Objective
- Why address housing needs
- Demographic & Economic Trends
- Housing Stock & Market Trends
- Housing Affordability & Needs
- Community Engagement
- Recommendations & Next Steps

City of Loveland

Why address housing needs?



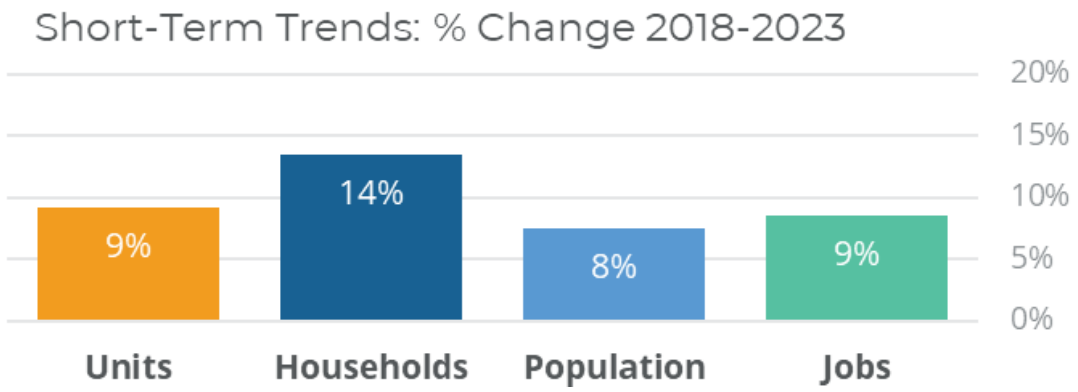
Project Objective:

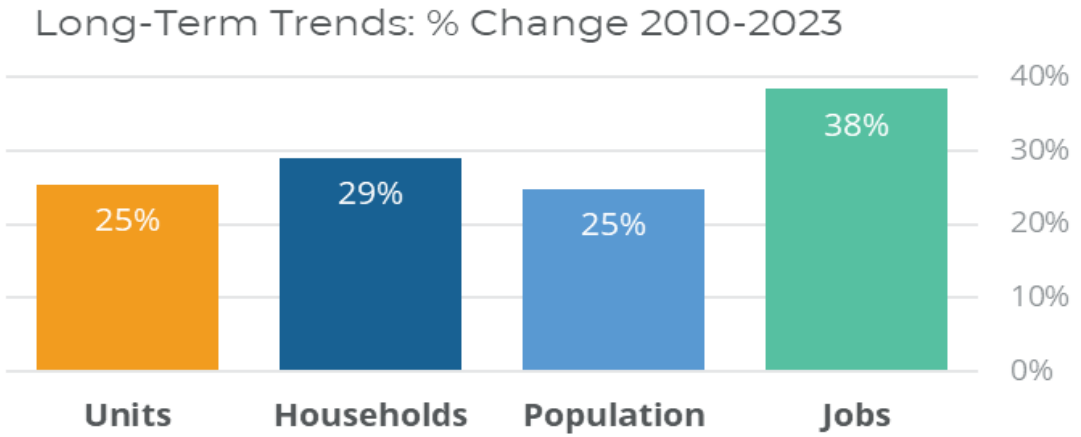
- Understand current and future housing needs
- Comply with SB24-174 – unlock funding
- Inform Housing Action Plan



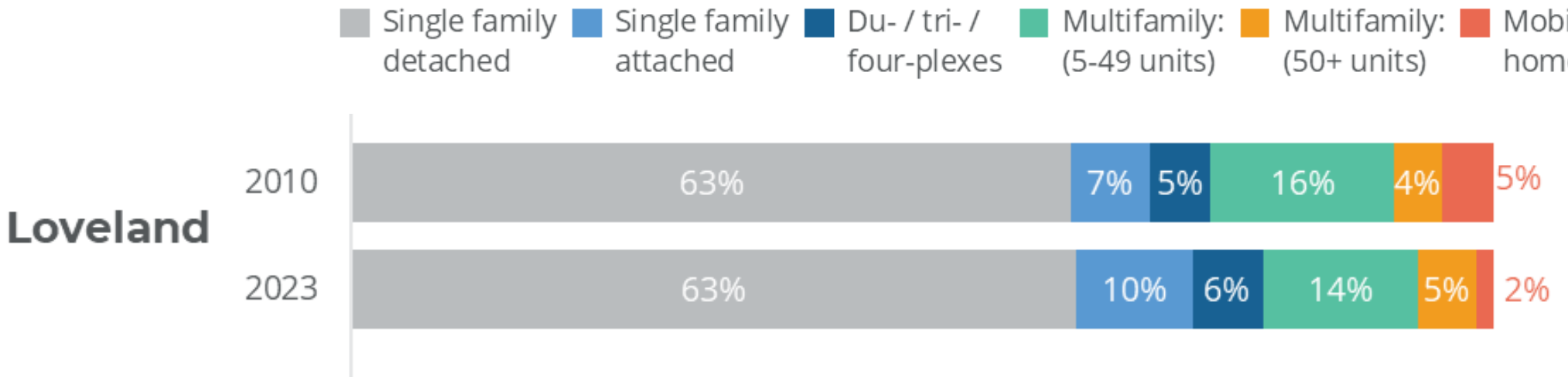
Larimer County HNA: Project Overview

Regional Housing Supply

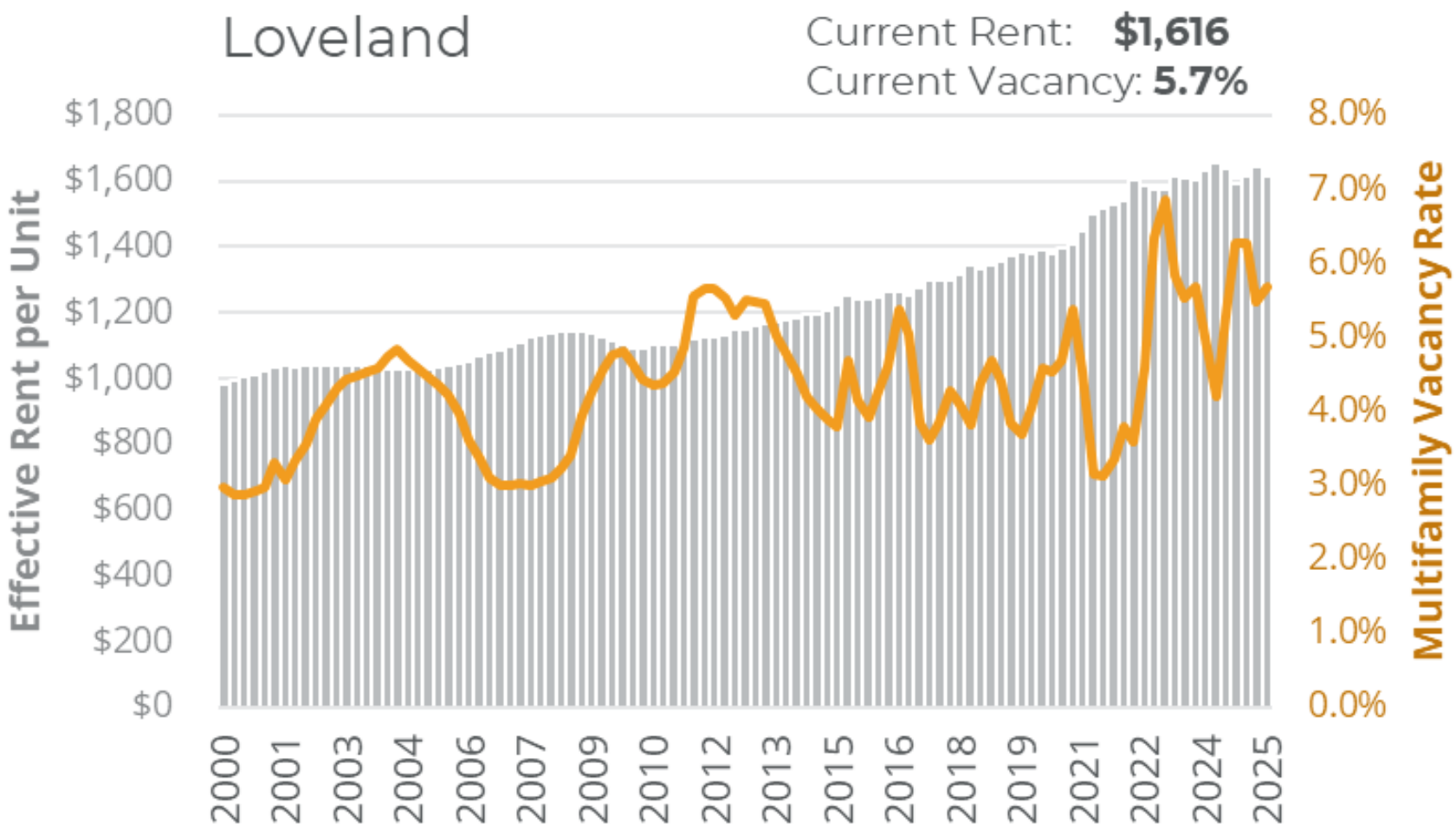




Local Housing Type

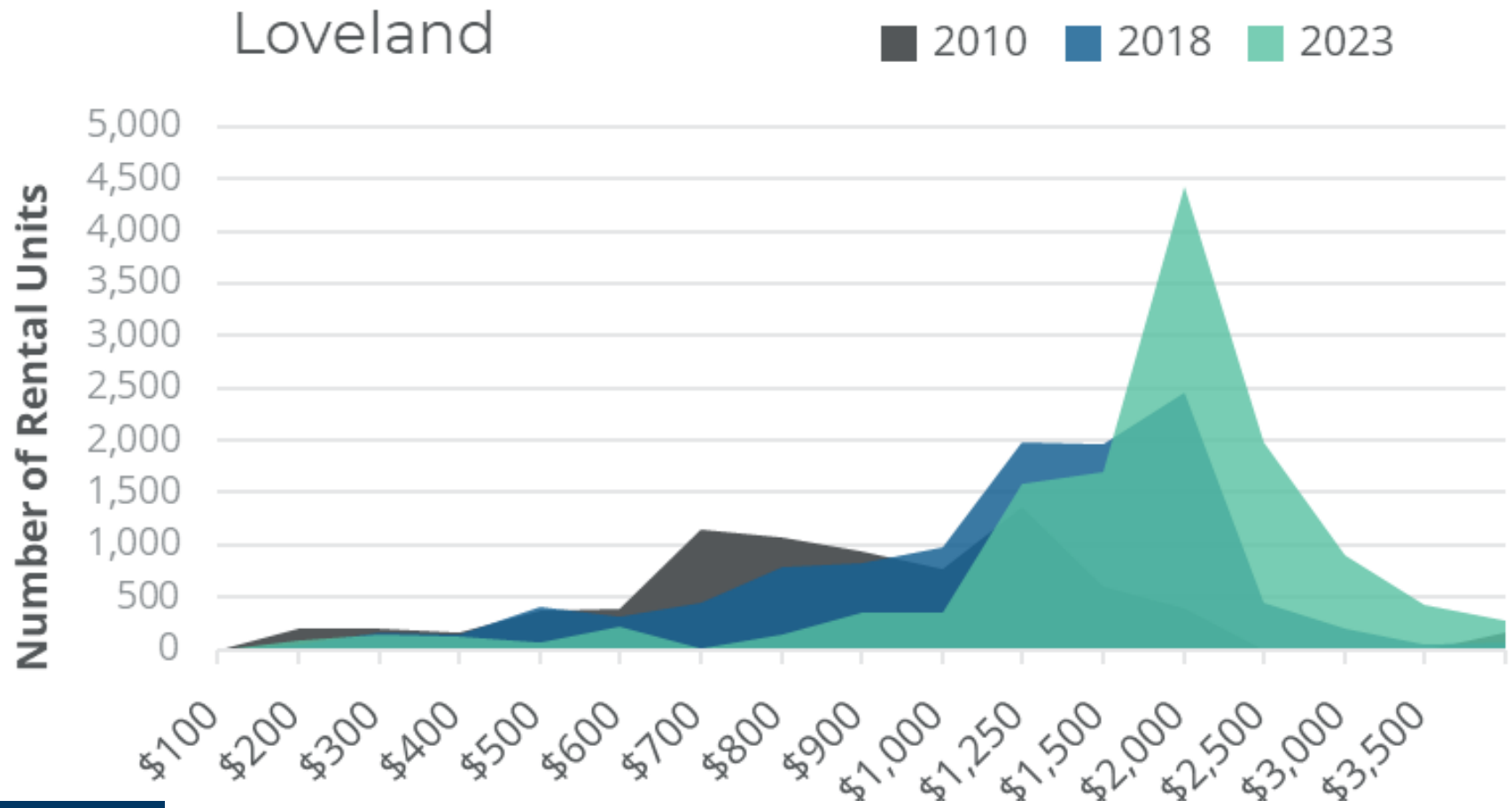


Rental Market: Average Rent & Vacancy



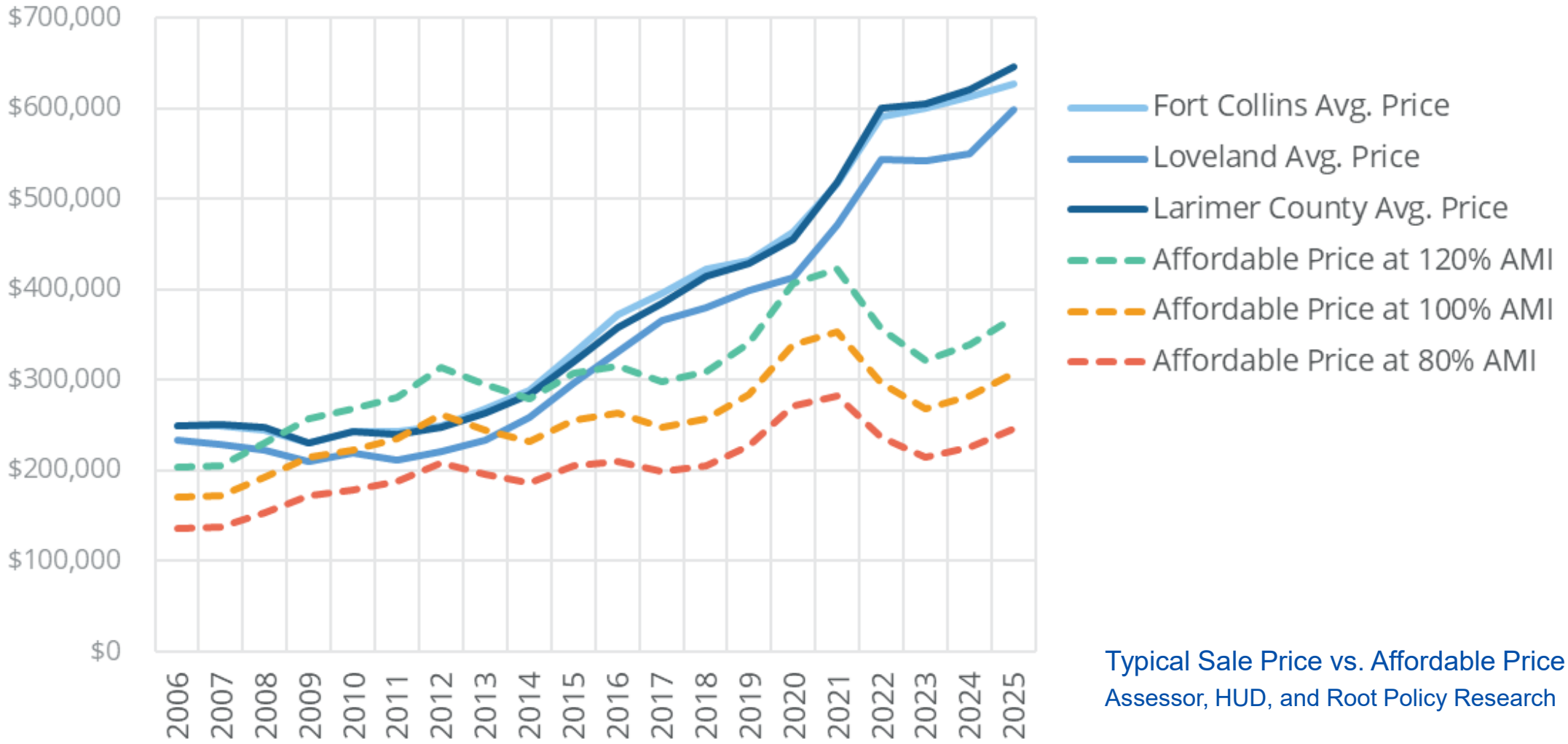
Multifamily Rent and Vacancy Trends | Source: Costar and Root Policy Research

Rental Market: Loss of NOAH



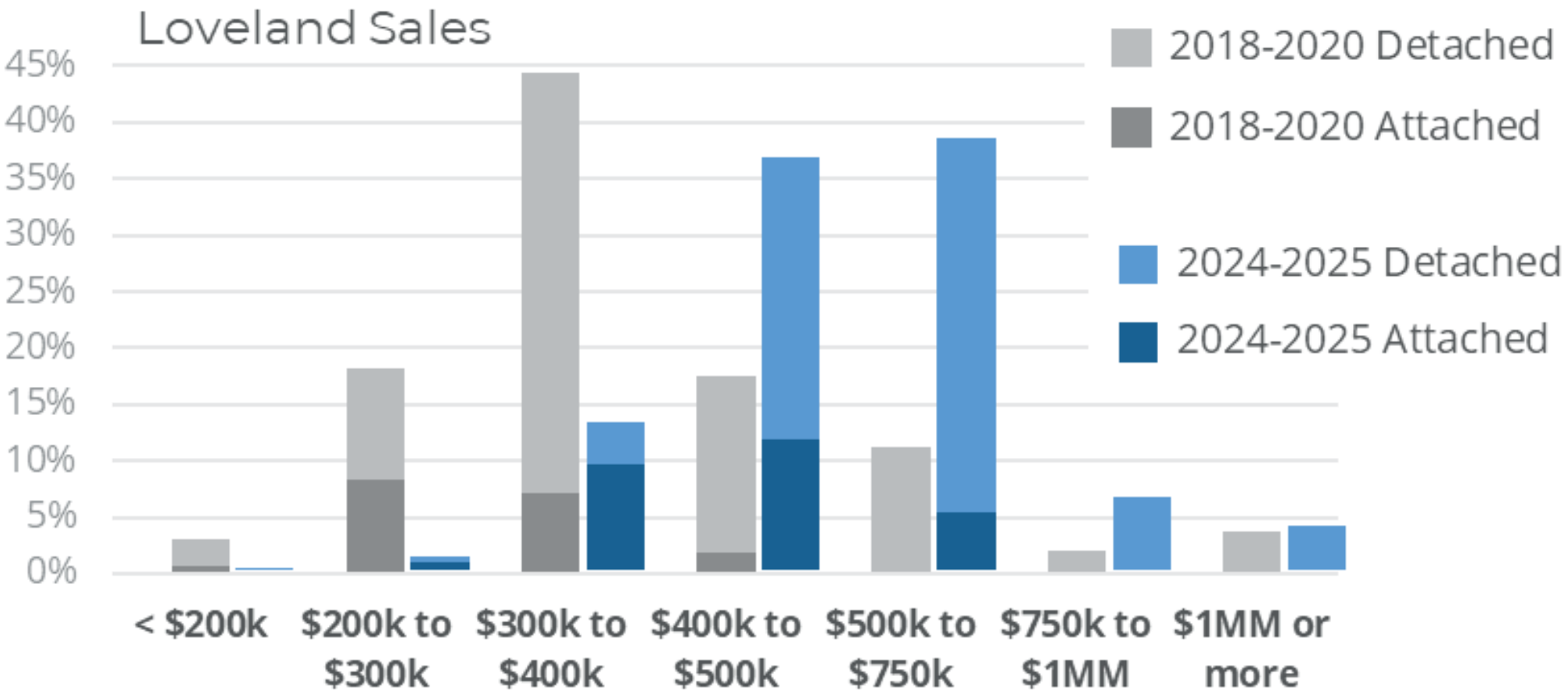
Rent Distribution, 2010, 2018 and 2023 | Source: ACS and Root Policy Research

Home Purchase Market:
Typical Sale Price vs Affordable Home Price by AMI



Typical Sale Price vs. Affordable Price Source: Assessor, HUD, and Root Policy Research

Home Purchase Market:
Sales Distribution by Price and Type, 2018/20 and 2024/25

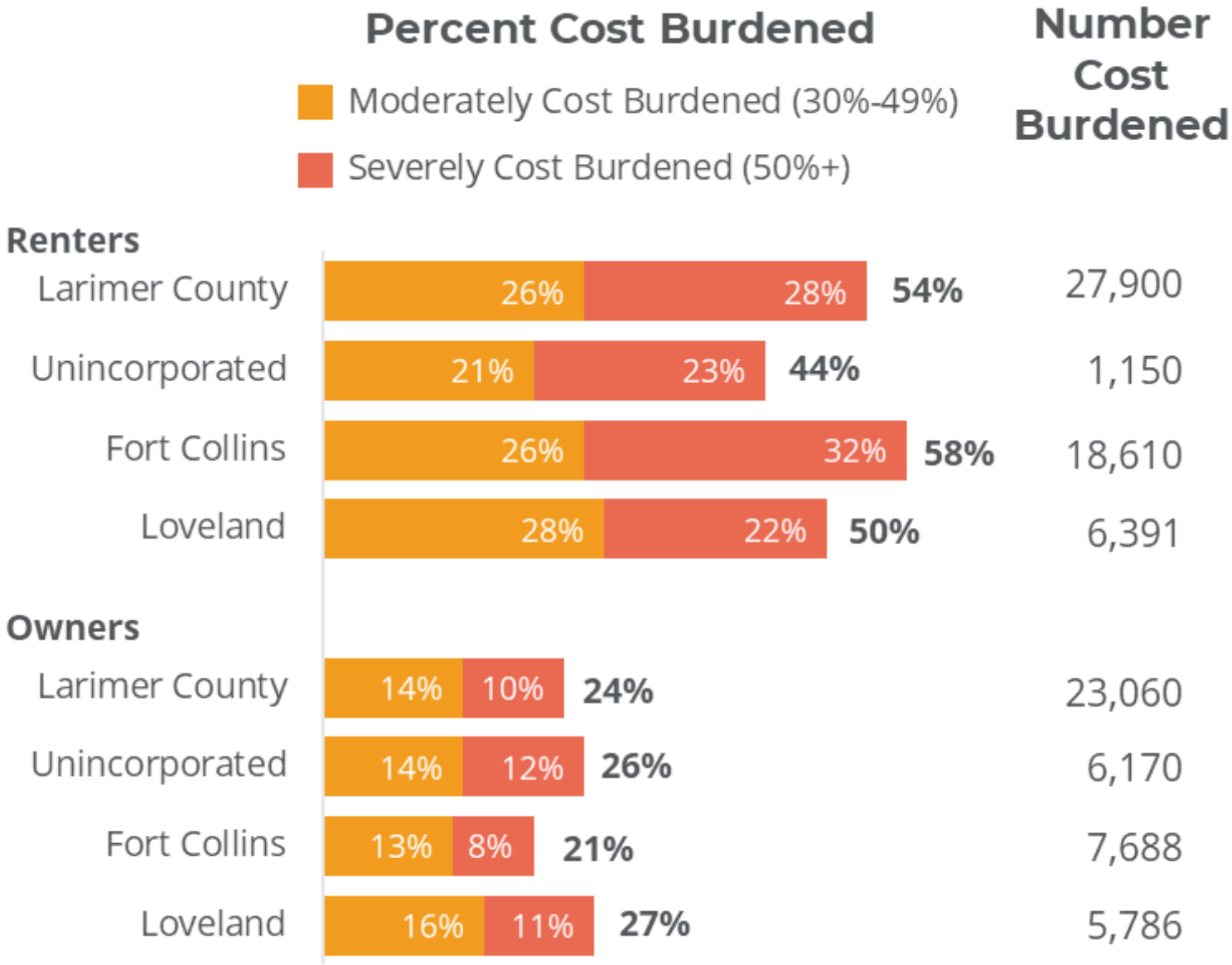


Home Sales by Price and Type | source: Assessor, HUD, and Root Policy Research

Housing Stability

In Larimer County:

- 51,000 cost burdened households
- 24,000 severely cost burdened
- Nearly 7,000 people experienced homelessness (2024).



Cost Burden, 2023 | source: ACS and Root Policy Research

Housing Needs

Affordability Gaps and Production Needs in Loveland

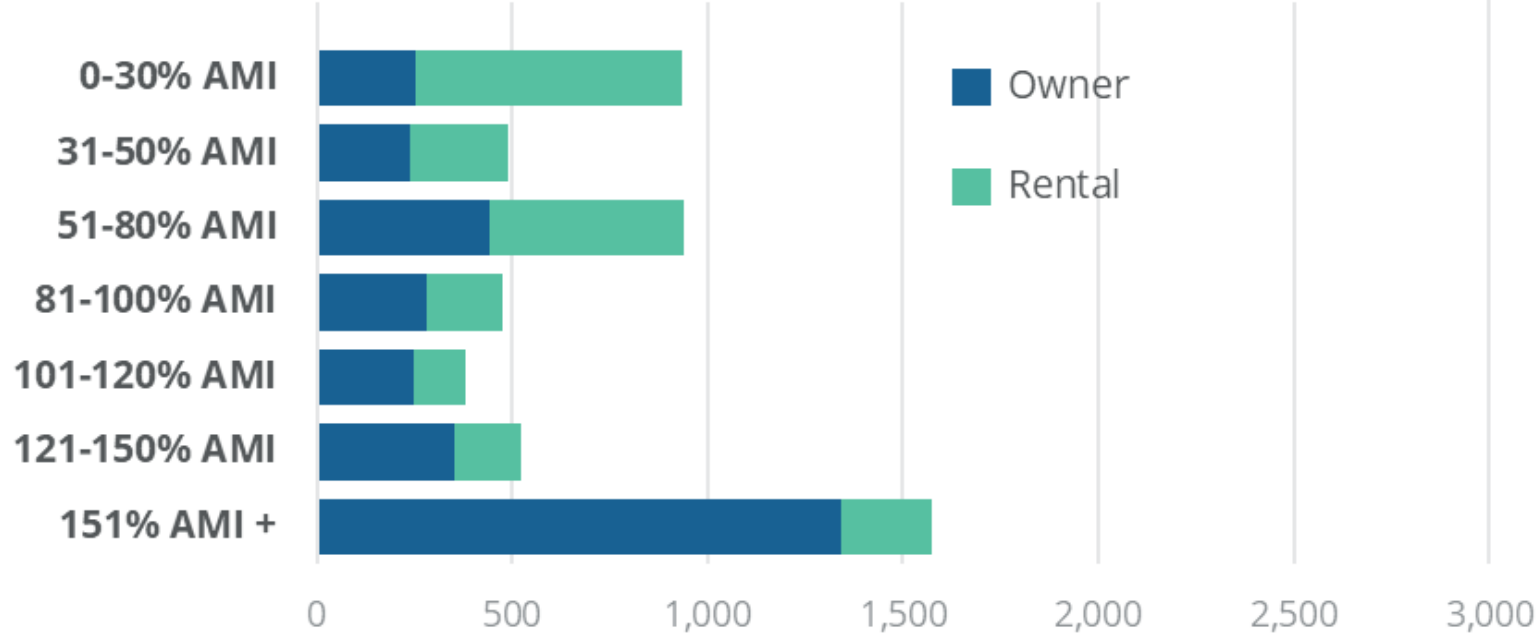
Current Affordability Gaps (mismatch in supply and demand)

Affordability gaps can be addressed through new units at needed price-points and/or subsidies of existing units.



Production Needs by 2035 (Catch-up + Keep-up): 5,321 units

New units needed to alleviate overcrowding, soften vacancy rates, and keep up with projected household and job growth through 2035.

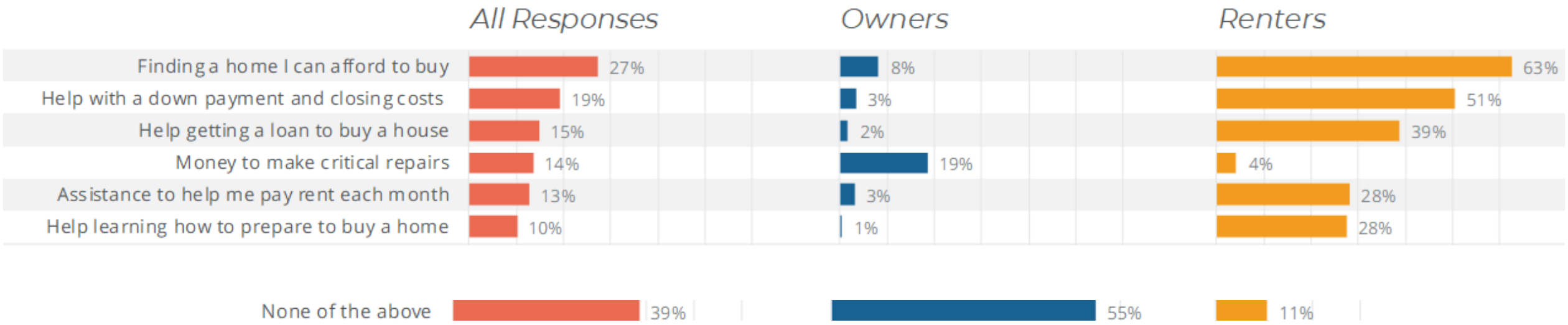


Engagement Opportunities

- **Community meetings** (Fort Collins, Loveland, Red Feather)
- **Stakeholder focus groups and interviews (**developers, economic development officials, service providers)
- **Employer survey** (43 respondents)
- **Resident focus groups** (mobile home communities, people experiencing homelessness, older adults, and families receiving rental/utility assistance)
- **Resident Survey** (1,146 respondents)

Housing Stability:

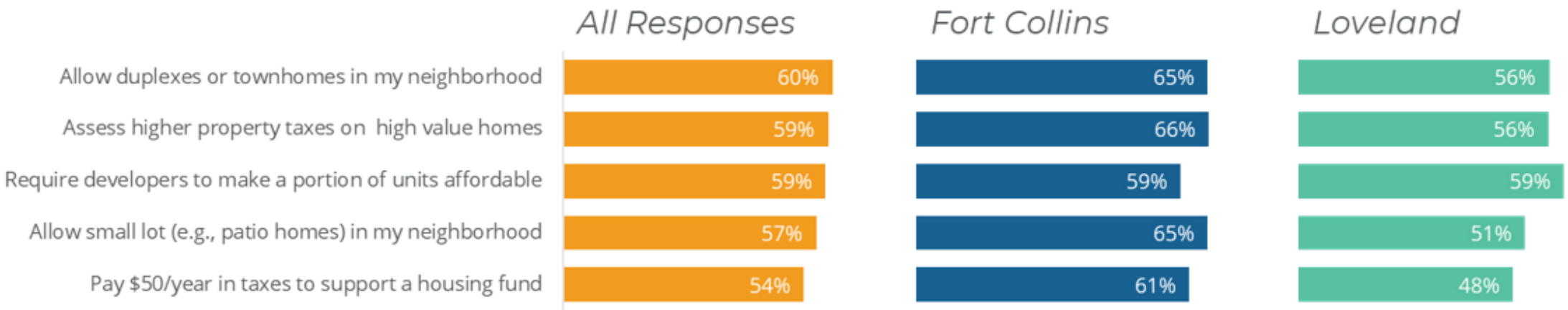
What would make you feel more secure in your current housing situation?



IMPORTANCE RATINGS OF VARIOUS HOUSING TYPES



AFFORDABILITY TRADEOFFS



Recommended Actions

1. Continue regional collaboration and public-private partnerships.
2. Consider funding source options.
3. Allocate publicly owned land to affordable/mixed income development.
4. Preserve existing housing (serving low and moderate income households).
5. Implement land use and zoning modifications (to unlock supply and improve housing diversity).
6. Refine or expand development incentives for affordable housing.
7. Assist and stabilize existing households through program support.

City of Loveland

Council Questions

City of Loveland

Thank You!

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EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

INTRODUCTION

Larimer County, Loveland, and Fort Collins partnered to conduct this Regional Housing Needs Assessment (HNA) to determine the region's greatest housing needs and better understand challenges faced by residents in finding and keeping stable housing.

The HNA will be followed by jurisdictional Housing Action Plans (HAP) that identify strategies related to housing affordability, stability, and future growth. Not only will the HNA and future HAPs help the County, Loveland, and Fort Collins better serve their communities, but completion also unlocks funding preferences from the State.

Report Organization:

I. Demographic Trends
II. Economic Trends
III. Housing Inventory
IV. Housing Market Trends
V. Housing Problems and Displacement Risk
VI. Community Engagement Summary
VII. Community Survey Analysis
VIII. Current and Projected Housing Needs
IX. Resources, Barriers, and Recommendations

Report prepared by Root Policy Research (www.rootpolicy.com) for Larimer County, the City of Loveland, and the City of Fort Collins. Current draft: February 25, 2026.

DEFINING AFFORDABILITY AND AMI

The most common definition of housing affordability is linked to industry standards, which consider housing affordable when housing costs—rent or mortgage payment plus taxes and utilities—consumes 30% or less of a household's gross income. Households paying more than 30% are "cost burdened" and have less money to spend on other essentials like healthcare, education, groceries, and transportation—adversely affecting their well-being, limiting economic growth potential, and constraining local spending.

The HNA uses both household income ranges and "Area Median Income (AMI)." AMI is a measure of income based on the median, or middle income household. Housing programs base program eligibility on income limits that are represented as percentages of AMI (published by HUD by region and household size).

Figure ES-1. Larimer County HUD Income Limits, 2025

	Persons in Family				
	1	2	3	4	5
30% AMI	$26,850	$30,650	$34,500	$38,300	$41,400
50% AMI	$44,700	$51,050	$57,450	$63,800	$68,950
80% AMI	$71,500	$81,700	$91,900	$102,100	$110,300
100% AMI	$89,400	$102,100	$114,900	$127,600	$137,900
120% AMI	$107,280	$122,520	$137,880	$153,120	$165,480

Source: HUD Income Limits and Root Policy Research.

EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

WHY WORK TO ADDRESS HOUSING NEEDS?

A balanced housing stock accommodates a full "life cycle community"—where there are affordable housing options for residents of all stages of life from young adults to centenarians—which in turn supports the local economy and contributes to Larimer County's culture and community.

- Research shows that a constrained housing market negatively impacts economic growth while stable and affordable housing is central to the health of individuals, families, and communities.
- Households living in stable housing are more likely to spend their incomes in the local economy through direct spending on goods and services.
- Housing investments that allow workers to live near their place of employment can reduce the impacts of traffic and commuting, and attract new businesses by increasing recruitment, productivity, and retention of talent.
- Affordable housing is key to providing high quality public services as many essential workers (e.g., first responders, medical professionals, and teachers) often leave communities that do not have an adequate supply of housing in their price range.
- Affordable housing also plays a key role in preventing and resolving homelessness.
- Generational wealth from affordable homeownership is a major contributor to positive outcomes for children and youth. As housing and equity are passed down, young adults have the option to remain in their community and have families of their own.
- Housing investments and stable housing environments bolster local revenue, increase job readiness, help renters transition to homeownership, lower public costs of eviction and foreclosure, and increase the economic and educational opportunities for children.



EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

DEMOGRAPHIC & ECONOMIC TRENDS

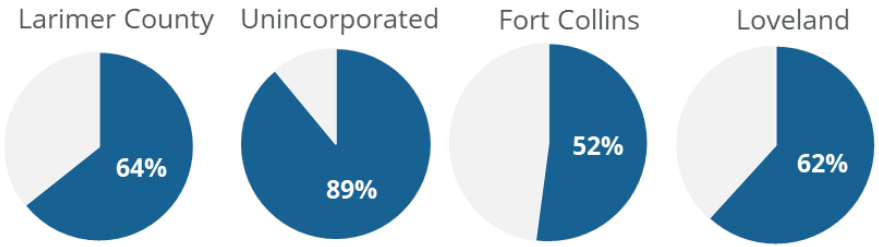
Forecasted growth, aging population, and rising incomes but declining rates of homeownership for income levels that have historically been entry-level buyers (households with incomes between $50,000 and $100,000).

Population: Larimer County's population has experienced steady growth most of the last decade, with continued growth anticipated through 2025, though neighboring Weld County is expected to grow at an even faster rate and surpass Larimer County's population in 2026.

Similar to national and state trends, the county's population is aging, and forecasts show continued growth in the senior (over 65) demographic, which can impact both housing preferences and future service and accessibility needs.

Homeownership rates in Larimer County, and in Fort Collins and Loveland, declined slightly since 2010, similar to statewide trends, with the most dramatic declines among households earning between $50,000 and $100,000—historically a common range for first-time buyers. Declines in homeownership can be a positive trend when it reflects an increase in needed rental development. However, it can also reflect barriers to accessing homeownership.

Figure ES-2. Homeownership Rates, 2023

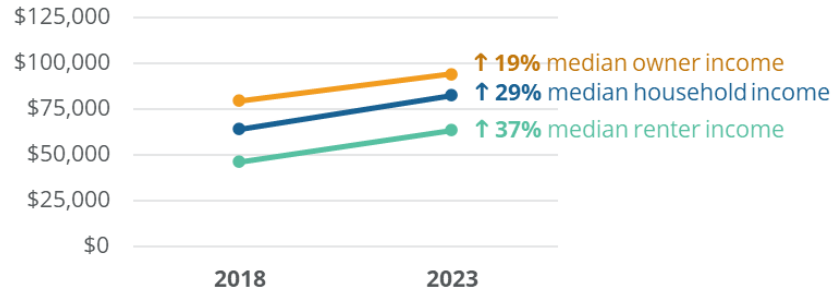


Source: 2023 5-yr ACS and Root Policy Research.

Income and poverty. The median income in Loveland is $82,592, similar to Fort Collins ($83,598), but lower than the county overall ($91,000). Over the past five years, the median household income rose 29%—exceeding inflation (21%) but lagging the rise in home prices and rents. Income gains were stronger elsewhere in the county, but still failed to keep pace with rising home prices. Loveland's median renter income rose 37%, which reflects income gains for some renters coupled with an influx of higher income renters and existing renters remaining in a rental unit rather than purchasing a home even as they reach income levels that historically reflect first-time buyers.

Poverty in Larimer County overall is moderate (11%); Loveland has lower poverty (8%), though certain groups experience disproportionately high poverty: some racial/ethnic groups, residents aged 18-24, residents with disabilities, and single mother households.

Figure ES-3. Median Income by Tenure, Loveland



Source: 2018 and 2023 5-yr ACS and Root Policy Research.

EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

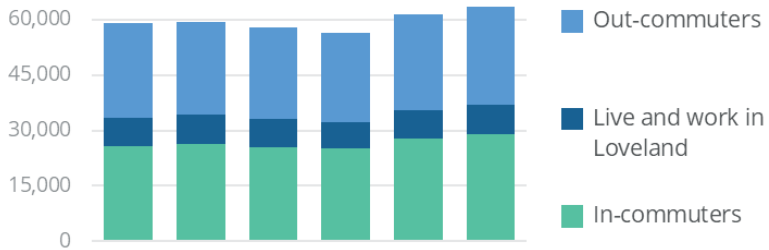
Jobs and wages. Job growth outpaced housing production during the 2010s, though that trend has started reversing and over the next 10 years (2025-2035), production is expected to increase faster than jobs (according to the Colorado demographer, DOLA SDO).

The average wage across industries increased 30% from 2018 to 2023, exceeding national inflation (21%). Even so, wage gains were insufficient to keep up with housing prices in Larimer County—rents rose 37% and home prices 56%.

Commuting. Loveland has high levels of both in- and out-commuting: 79% of Loveland jobs are filled by in-commuters (just 21% of jobs are filled by Loveland residents); and 77% of all working residents commute to jobs outside of Loveland. In-commuters to Loveland are most likely to come from Weld County, Boulder County, or Fort Collins. Out-commuters most commonly have jobs in Fort Collins, Weld County, Boulder County, or Denver.

The COVID-19 pandemic increased the share of workers working from home across the country and Loveland was no exception—7% of workers in 2018 worked from home compared to 16% in 2023.

Figure ES-4. Inflow/Outflow of Loveland Workers

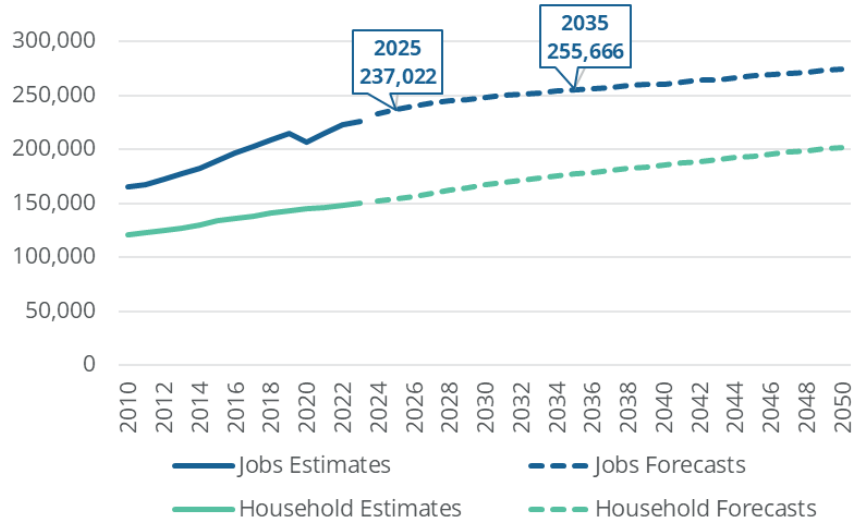


Source: LEHD and Root Policy Research.

Projected growth. Growth projections have a significant impact on the types (and volume) of housing construction needed over the next 10-15 years to maintain market health and commuting ratios.

Larimer County employment is projected to grow by 16% through 2050 and the number of households is expected to increase by 31%. DOLA's growth projections are not available by City.

Figure ES-5. Job and Household Forecasts,2023-2050



Source: DOLA and Root Policy Research.

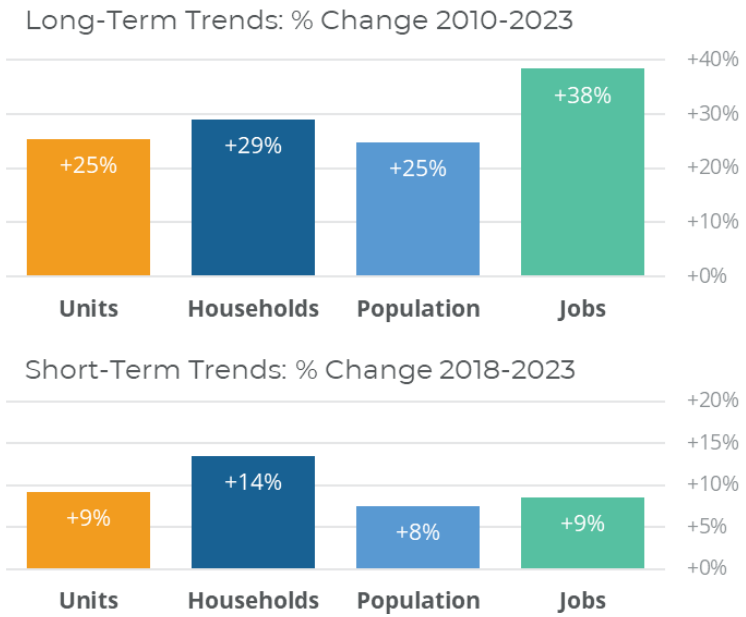
EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

HOUSING STOCK & MARKET TRENDS

Housing production is keeping pace with population and job growth (after a period of undersupply). Steep price and rent increases—even with some softening in the last 2 years—outpace wages and inflation and lead to losses in naturally occurring affordable housing.

Housing production and type: The rate of housing unit production in a regional housing market plays a key role in both regional and local affordability: when growth cannot accommodate regional demand, prices rise. Long-term trends in the county (2010-2023) show economic growth outpacing housing production, but more recent trends (2018-2023) indicate housing production is on pace with job growth though still lagging growth in households.

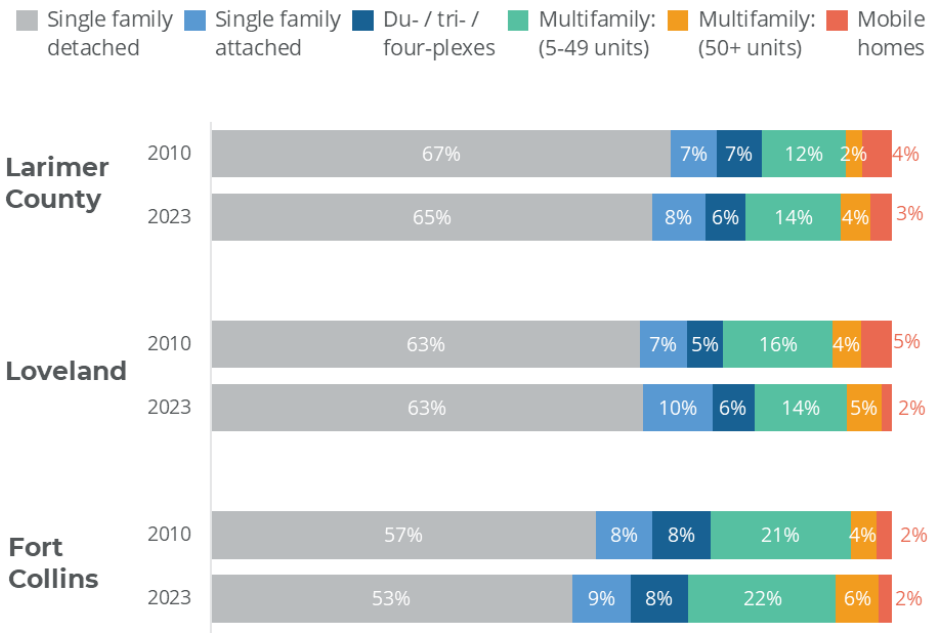
Figure ES-6. Percent Change in Housing Units vs. Households, Population, and Jobs, Larimer County



Source: 2010, 2018 and 2023 5-yr ACS, DOLA and Root Policy Research.

The way in which a community grows also affects affordability—some housing types are less costly to construct creating more natural affordability and/or serving different market segments. Housing stock composition in Loveland shifted slightly since 2010 as "missing middle" housing types (townhomes, duplexes, triplexes) increased as a proportion of the overall stock (from 12% to 16%). Single family detached remains the most common housing type (63%).

Figure ES-7. Units in Structure, 2010 and 2023



Source: 2010, 2018 and 2023 5-yr ACS, DOLA and Root Policy Research.

EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

Rental market. Between 2018 and 2023, median rent in Loveland increased dramatically (41%) as existing rental units shifted into higher price points and new products were delivered near the top of the market. Rent growth plateaued over the past 2 years with relatively little change in median rents between 2023 and 2025.

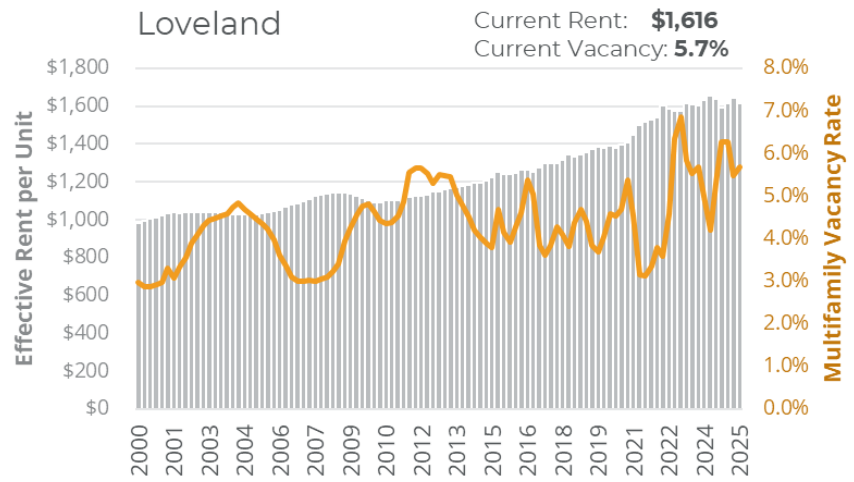
Market dynamics tied to this recent softening of rents go back to the multifamily production slowdown during COVID: multifamily production slowed and vacancy rates dropped, driving sharp increases in rents between 2020 and 2023. As the market stabilized, vacancy rates started to rise and rents moderated.

Even so, current rental vacancy rates are still below 6% (rates below 10% signal a tight rental market). Forecast models suggest that rents will start rising again in 2026 but predict just a 7% increase in median rents over the next 5 years (to $1,725 in 2030).

Rent increases occurred across market segments, resulting in a significant loss of naturally affordable rental stock. Figure ES-9 shows changes in the distribution of rent in Loveland; the distribution includes income-restricted units and reflects the reduced rents of housing choice voucher holders.

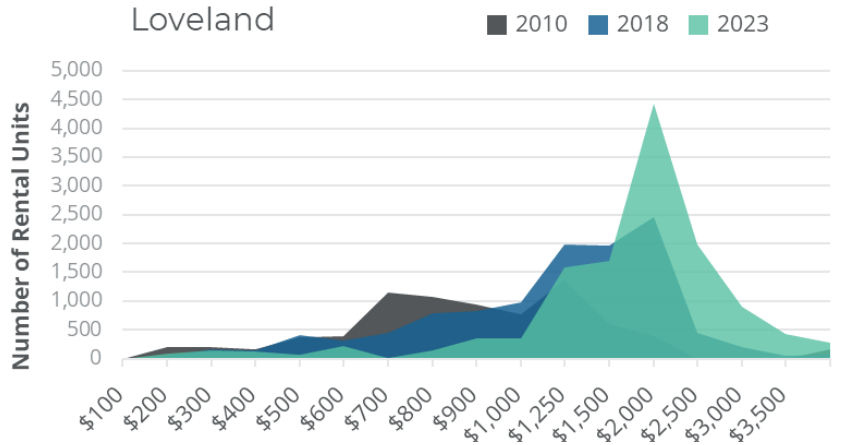
In Loveland, 68% of rental units were priced below $1,000 per month in 2010. This dropped to 36% in 2018, then to just 12% by 2023. The proportion of rentals priced below $1,500 was nearly cut in half between 2018 and 2023 (from 72% down to 37%).

Figure ES-8. Multifamily Rent and Vacancy Trends, 2000-25



Source: Costar and Root Policy Research

Figure ES-9. Rent Distribution, 2010-2023



Source: 2010, 2018 and 2023 ACS and Root Policy Research.

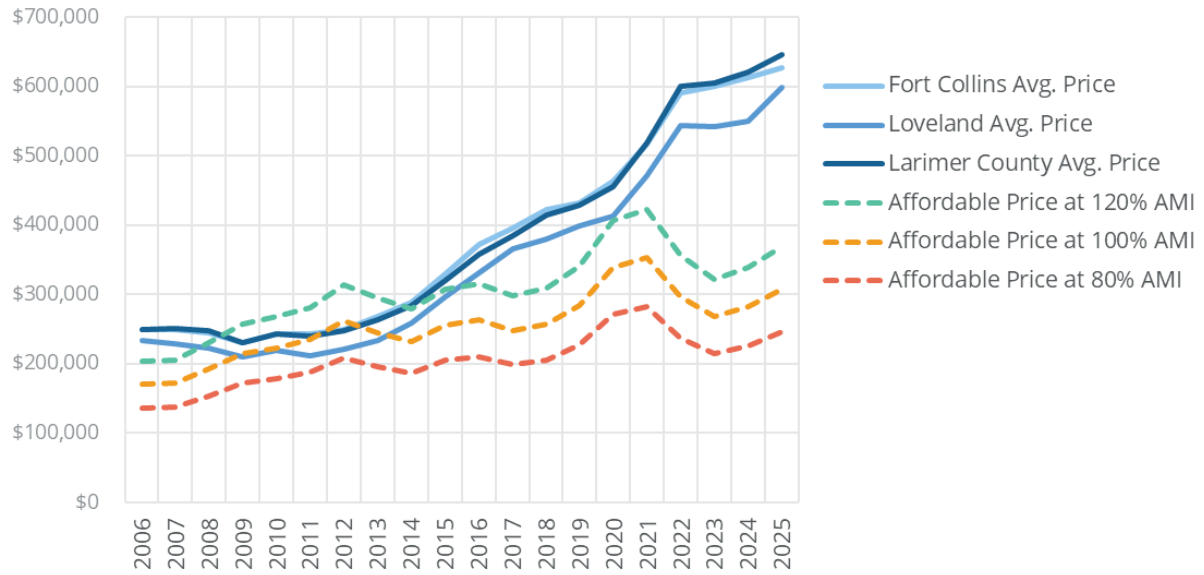
EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

Home purchase market. Typical home prices in Loveland have historically been similar to the statewide average (and about 10% lower than the countywide average). Following a decade of steep increases, prices have moderated in the last couple of years; however, purchase affordability remains a challenge due to relatively high interest rates and lagging income gains. Figure ES-10 tracks the affordable home price for households earning 80%, 100%, and 120% of AMI alongside the typical home prices in the County, Fort Collins, and Loveland. Affordable price accounts for changes in both income and mortgage interest rates.

Since 2022, prices have continued to rise despite higher interest rates that compressed affordability. Since that time, the gap between an affordable price and the actual price is nearly a $300,000 difference (for 100% AMI).

As shown in Figure ES-11, between 2020 and 2025, the biggest price shift was a loss of homes priced between $300,000 and $400,000 (and an increase in homes priced $400,000 or more). Similar trends were evident in Larimer County overall and in Fort Collins.

Figure ES-10. Typical Sale Price vs. Affordable Home Price by AMI, 2006-2025



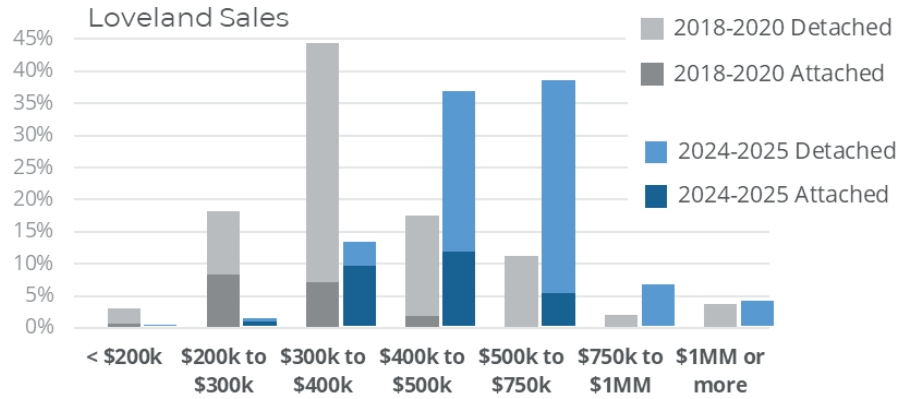
Note: Assumes a 30-year mortgage with a 10% down payment, 30% of monthly payment is used for property taxes, utilities, and insurance.

Source: HUD AMI, Larimer County Assessor, BLS, Freddie Mac (rates), and Root Policy Research.

Figure ES-11. Home Sales by Price and Type, 2018-2025 Q2

Note:
Excludes mobile home sales.

Source:
Larimer County Assessor and Root Policy Research.



EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

HOUSING AFFORDABILITY AND NEEDS

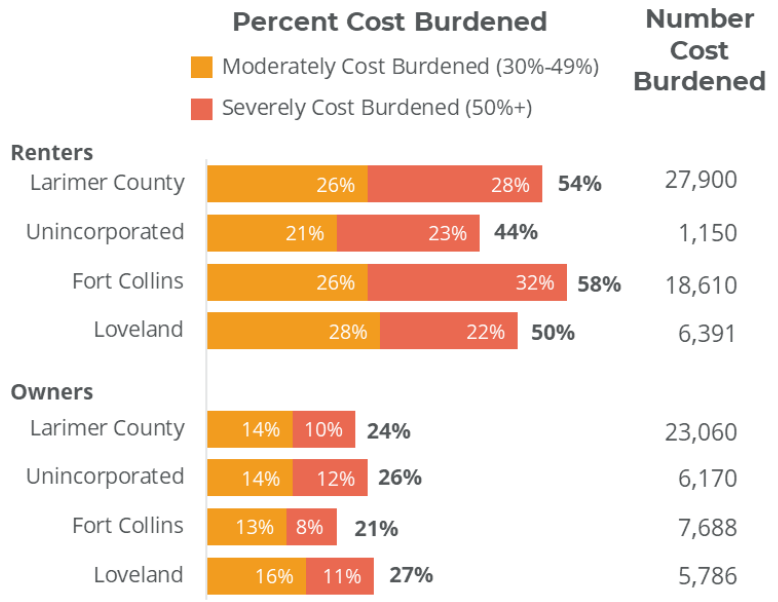
Changes in affordability, mismatches in supply and demand, and cost burden.

Homelessness. The Regional Homelessness Strategy Across Larimer County, drafted in 2025, provides an in-depth look at homelessness and housing instability across the county. According to that report, 6,816 people experienced homelessness in Larimer County in 2024 (HMIS data and doubled-up households). The 2025 point in time (PIT) Count identified 581 people experiencing homelessness on a single night, about one-third of whom were unsheltered.

Cost burden. Half of Loveland's renters pay more than 30% of their gross income in housing costs and are considered "cost burdened" compared to one in four owners. Since 2010, cost burden has shifted more heavily into moderate and even higher income brackets in the County overall as well as within Loveland and Fort Collins.

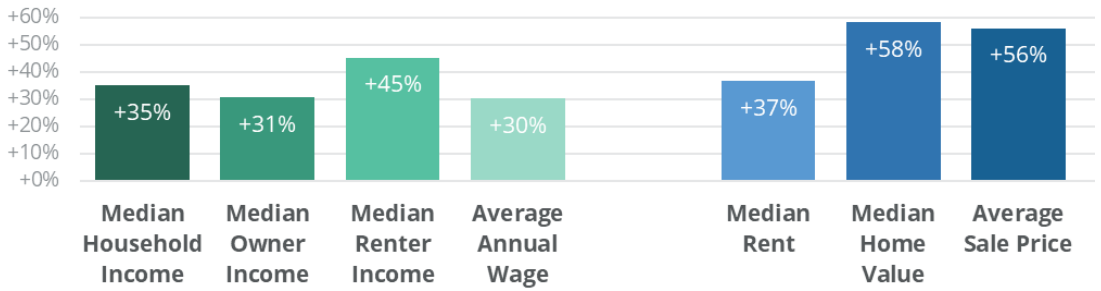
Changes in affordability. At the median, the rise in home prices regionwide exceeded income and wage gains over the past five years. Median renter incomes rose at a slightly higher rate than median rents; however there remains a substantial affordability gap for many renters (as evidenced by their high rate of cost burden and the housing needs discussed on the following page).

Figure ES-12. Cost Burden by Tenure, 2023



Source:
2023 5-year ACS, and Root Policy Research.

Figure ES-13.
Percent Change in Income vs. Rent / Home Prices, Larimer County, 2018-23



Source: 2023 5-year ACS, and Root Policy Research

EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

Affordability Gaps—mismatches in supply and demand by price-point: The affordability gaps analysis shows that affordability needs in Loveland are concentrated below 30% AMI in the rental market (but extend up to 60% AMI); and below 120% AMI in the for-sale market (but extend up to 150% AMI). In other words, current demand outweighs the existing supply of affordable, available units at these price points.

As shown in Figure ES-14, there is an affordability shortage of nearly 3,000 units for renters earning <30% AMI (even accounting for income-restricted rental units).

Figure ES-14. Rental Affordability Gap, Larimer County, 2023



Source: 2023 ACS and Root Policy Research.

The incomes of would-be buyers are also misaligned with available units for sale: 39% of renters earn between 50% and 120% AMI—a range typical of first-time homebuyers. However, only 9% of homes sold in 2024-25 were affordable to them.

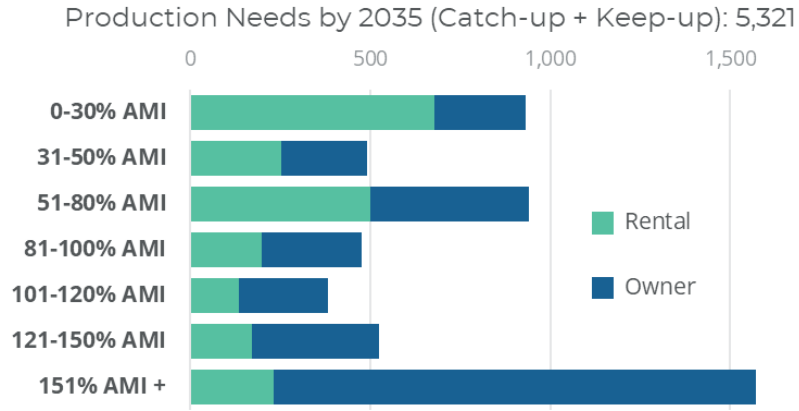
Affordability gaps can be addressed through creation of new units at needed price-points and/or through subsidies of existing units.

Production Needs—current ("Catch-Up") and future ("Keep-Up") housing need: New units needed to ensure housing availability and stability for Loveland households—distinct from the units or subsidies needed to make housing affordable to current households—include:

- **Catch-up needs:** Loveland needs **748 new units** to alleviate overcrowding and soften vacancy rates for current residents.
- **Keep-up needs**: Loveland needs to add **4,573 units** in the next 10 years to keep up with projected population and job growth.

Figure ES-15 shows the total production needs (catch-up and keep-up needs combined), by income and tenure for Loveland. While market rate development may produce ownership units above 150% AMI and rental units above 80% AMI, public assistance is needed to deliver ownership units below 150% AMI and rental units below 80% AMI.

Figure ES-15. Production Needs by 2035 by Tenure and AMI



EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

COMMUNITY PERSPECTIVES

Resident and employer surveys, resident focus groups, community meetings, and stakeholder interviews and focus groups.

Resident survey. Nearly 1,200 people participated in the Larimer County Resident Housing Survey with a demographic profile broadly representative of the county (by tenure, income and race). Key findings from the resident survey include:

Current housing situation

- Affordability is a primary driver of housing choice; Safety, bedrooms, and housing quality were secondary considerations.
- Precariously housed respondents (those living with friends or family but not on the lease) reported the highest rates of poor or fair housing conditions (38%), followed by single parents (35%), and mobile home occupants (25%).
- Nineteen percent of respondents with a disability or a household member with a disability reported that their home does not meet accessibility needs. The most commonly needed features were ramps and bathroom grab bars.

Housing stability and displacement

- Respondents identified resources that would help them feel more secure in their current housing, most commonly: finding an affordable home to buy; help with a down payment; help getting a loan; money to make critical repairs; and rental assistance.
- Sixteen percent of respondents said they had to move when they didn't want to within the past five years, most often due to rent increases. Displacement rates were highest among renters, single parents with children, and precariously housed.

Future housing choice

- Nearly half of survey respondents (47%) plan to stay in their current home as long as possible; 43% wanted to move within the next three years (though about half of those are concerned they won't be able move due to affordability concerns); and 9% said they want to stay in their current home but are worried they won't be able to do so (most commonly due to concerns about housing costs, health, and keeping up with home maintenance).
- Among renters who want to buy, top barriers to homeownership are inability to afford a down payment followed by affording mortgage payments and fees, and inability to afford homes near work or preferred schools. A majority of renters expressed interest in deed restricted homeownership programs as a potential solution.

Housing solutions and policy input

- Respondents rated "housing affordable to public service and retail workers", "housing affordable to residents on a fixed income (like social security)," and "starter homes." as the most important housing types to local housing supply.
- Survey respondents were very open to "light density" housing products in their neighborhoods, including duplexes, townhomes, and accessory dwelling units (ADUs). There was also relatively strong support for 3-story apartment buildings, with the caveat that they are located at bus stops or major roads.

EXECUTIVE SUMMARY FOR LOVELAND:
LARIMER COUNTY REGIONAL HOUSING NEEDS ASSESSMENT

- To increase affordability in their communities, 60% of respondents said they would support allowing duplexes or townhomes in their neighborhood, and 59% supported higher property taxes on high-value homes.

Figure ES-16. Trade-Offs to Make Housing More Affordable



Note: n = 839.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

Tailored outreach in the form of focus groups was conducted with resident groups facing unique housing challenges, included residents living in mountain/rural communities, members of the Agricultural Advisory Board, mobile home communities, people experiencing homelessness, older adults, and families receiving assistance to better understand the barriers these groups face when accessing housing and community resources in the region. Detailed findings from these groups are discussed in Section VI.

Employer survey respondents overwhelmingly agreed that housing cost and availability "places a significant burden on employees, adding to their financial burdens and overall stress" (91% agreed); and adds commute time (82% agreed). Top priorities among employers were a larger supply of affordable rental housing and starter homes priced below $300,000 to serve their employees.

Stakeholder perspectives. Stakeholder observations highlighted common challenges across Northern Colorado communities, while detailing how unique geography, governance, and local economies shape the experience of housing instability in Larimer County. Several themes emerged:

- Housing affordability remains the most pressing challenge across Larimer County, with both rental and homeownership opportunities out of reach for low- to moderate-income residents.
- Certain populations face disproportionate housing barriers, including seniors on fixed incomes, families seeking larger affordable units, individuals needing temporary or emergency housing, and service industry employees. Seasonal employment and income volatility add to these challenges, particularly in mountain communities like Estes Park.

EXECUTIVE SUMMARY FOR LOVELAND:
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- A mismatch between existing housing supply and local needs persists across the region. Stakeholders noted shortages of deeply affordable and smaller units (one bedroom or studios), accessible senior housing, transitional or temporary housing options, and smaller for-sale homes for first time buyers.
- Barriers to new development include high construction costs, financing costs, limited developable land, community opposition, infrastructure constraints, and zoning barriers.
- Gaps in services affect residents with the greatest housing needs. Stakeholders pointed to limited emergency shelter beds, lack of temporary housing options with wrap-around services, transportation challenges (especially in rural and mountain areas), and difficulty accessing programs in rural areas.
- Stakeholders suggested targeted solutions, including expanding rental and utility assistance, aligning programs with identified needs, improving service access in rural areas, and continuing to support local collaborative networks that have been effective in meeting residents' needs.

RECOMMENDATIONS

The recommendations below help set the stage for future Housing Action Plans. Specific actions and approaches will differ by community.

Recommendations are designed to achieve an integrated approach that leverages key partners and financial assets (both land and funds) to create housing that serves current and future residents, preserves existing affordability; and assist low-income households:

1. Continue regional collaboration and public-private partnerships.
2. Consider funding source options.
3. Allocate publicly owned land to affordable/mixed income development.
4. Preserve existing housing (serving low and moderate income households).
5. Implement land use and zoning modifications (to unlock supply and improve housing diversity).
6. Refine or expand development incentives for affordable housing.
7. Assist and stabilize existing households through program support.

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Larimer County

Regional Housing Needs Assessment

DRAFT

PREPARED FOR

Larimer County
City of Fort Collins
City of Loveland

DRAFT REPORT

February 25, 2026

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INTRODUCTION

Larimer County, Loveland, and Fort Collins partnered to conduct this Regional Housing Needs Assessment (HNA) to determine the region's greatest housing needs and better understand challenges faced by residents in finding and keeping stable housing.

The HNA will be followed by jurisdictional Housing Action Plans (HAP) that identify strategies related to housing affordability, stability, and future growth. Not only will the HNA and future HAPs help the County, Loveland, and Fort Collins better serve their communities, but completion also unlocks funding preferences from the State.

Special thanks to:

- Larimer County staff, City of Loveland staff, and City of Fort Collins staff who guided the HNA project, provided background documents and local data, promoted community input opportunities, and offered thoughtful comments, suggestions and revisions on drafts.
- The Colorado Department of Local Affairs for the Strong Communities Grant that funded the development of the HNA.
- The residents and in-commuters who shared their experiences and perspectives by participating in community meetings, focus groups, and surveys, as well as to the business leaders, service providers, developers, and other stakeholders who made time for interviews, focus groups, and surveys—and shared resident engagement opportunities through their networks.
- Local officials, County Commissioners, and City Councilors, who will use the HNA and forthcoming HAPs to continue improving their communities.

WHAT IS A HOUSING NEEDS ASSESSMENT?

EXCERPT FROM COLORADO STATE GUIDANCE ON HNAS[1]

A Housing Needs Assessment (HNA) identifies the type and amount of housing needed in a community or region to ensure current and future resident and employee households at all income levels have access to quality housing that they can afford. As a result, an HNA does more than estimate the number of housing units needed to accommodate projected population or job growth. An HNA evaluates demographic trends, economic characteristics, housing unit inventory, housing market conditions, development opportunities and constraints, and existing housing programs and services, combined with input from stakeholders and residents, to identify where the market is providing suitable housing and where it is not. The HNA uses this information to estimate how much additional housing is needed to address current housing shortfalls and keep up with future growth. The objective is to estimate the housing needed to ensure quality housing is available and affordable for resident and employee households at all income levels and at different life stages to sustain community and economic health and vibrancy.

It is important to understand that an HNA is an informational tool. While the state of Colorado requires each local government to complete an HNA, the state does not require jurisdictions to build a certain number of housing units or produce a certain type of affordable housing. Rather, completed HNAs are to be used for state agency planning, select grant programs, and regions and local governments to develop housing action plans tailored to the unique constraints, resources, and capacity of a community or region.

[1] https://drive.google.com/file/d/1Q9-tcf1Yey6GGzvbwMROtrNYLjVG9-QY/view

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By identifying the current housing challenges and future housing needs in a community, an HNA serves many purposes, such as:

- ***Informing Housing Policy and Programs:*** *An HNA guides local governments, housing service organizations, and other partners in crafting policies, programs, and partnerships to address housing shortages and affordability challenges.*
- ***Planning for Change:*** *HNAs help communities plan for evolving demographic and economic conditions by estimating how many housing units will be needed as households, housing markets, and employment levels change.*
- ***Accessing Funding:*** *HNAs can be used to inform applications for state or federal housing grants and financing. This includes Colorado's State Affordable Housing Fund (or Proposition 123).*
- ***Increasing Affordability and Housing Stability:*** *By identifying the housing needs of households at different income levels, local governments can create programs to improve the availability of housing that is secure and affordable for residents.*
- ***Sustaining Community and Economic Vibrancy:*** *HNAs identify the housing needs of resident and employee households at all life stages, helping jurisdictions develop housing strategies that support local businesses, economic development, and a generally diverse and thriving community.*
- ***Educating and Building Support:*** *HNAs can be used to educate community members and leaders on housing problems, telling the data-driven "housing story" and providing robust information for decision-making, which is necessary to build program support within communities and address housing needs.*

HNA STRUCTURE

The HNA is organized by the following sections, following the general structure recommended by state guidance on HNA components:

I. **Demographic trends** evaluates demographic changes, which drive housing demand.

II. **Economic Trends** analyzes jobs, wages, and commuting to show whether housing meets workforce needs.

III. **Housing Inventory** evaluates existing housing stock by type.

IV. **Housing Market Trends** assesses how market factors like rents, home prices, and supply impact housing affordability.

V. **Housing Problems and Displacement Risk** provides data on cost burden, overcrowding, homelessness, and housing instability, including displacement risk indicators.

VI. **Community Engagement Summary** shares input from residents and stakeholders on housing challenges and solutions.

VII. **Community Survey Analysis** provides a detailed analysis of the 2025 Larimer County Resident Housing Survey.

VIII. **Current and Projected Housing Needs** ties together data from previous sections to estimate current and future housing needs across all income levels.

IX. **Barriers, Opportunities, and Recommendations** discusses development challenges, identifies available resources to support housing programs, and offers recommended strategies to address needs and improve affordability.

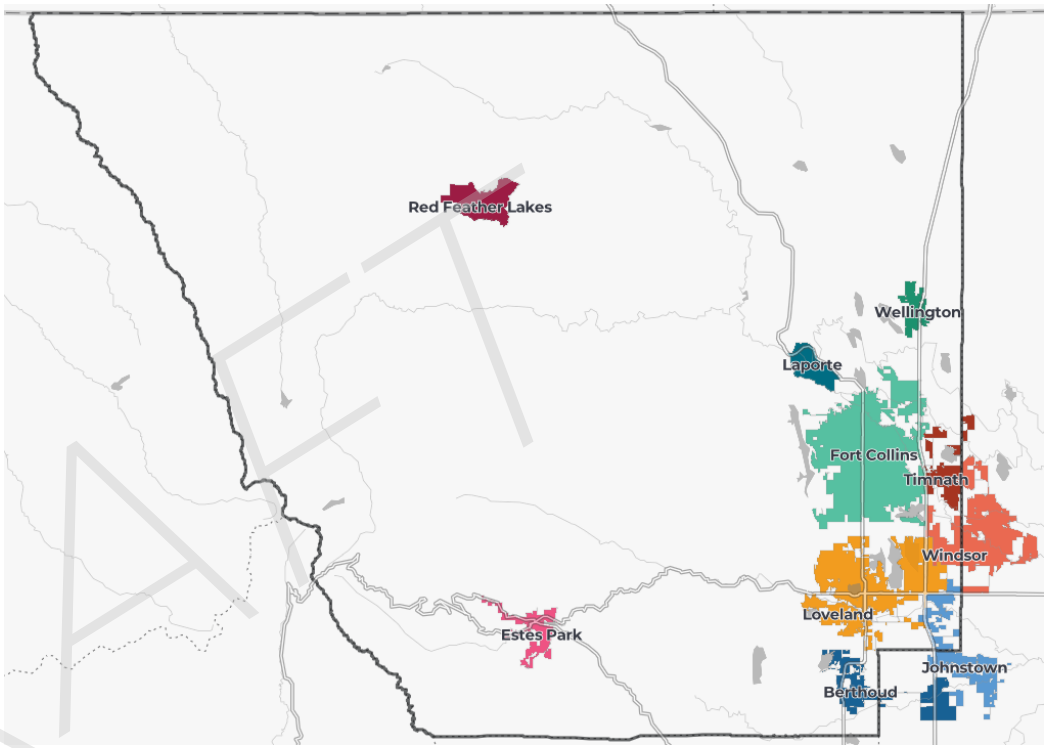
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INTRODUCTION

METHODOLOGICAL NOTES

Geographic areas. The following jurisdictions are part of a regional partnership to conduct the HNA: Larimer County; the City of Loveland; and the City of Fort Collins. The report includes data for each participating jurisdiction. Where possible, data for unincorporated areas of Larimer County are specified. Geographic terms are defined below:

- **Larimer County**—data identified as "Larimer County" refer to the entire County, inclusive of both incorporated and unincorporated areas.
- **Incorporated areas**—Fort Collins and Loveland collectively account for nearly 70% of the county's population but the county also encompasses other incorporated areas: Estes Park, Timnath, and Wellington, as well as portions of Berthoud, Johnstown, and Windsor.
- **"Unincorporated Areas"** reflect the balance of the county, including Red Feather Lakes and Laporte, which are "Census Designated Places" but are not incorporated.



Data sources. The data used for the needs assessment come from a variety of sources. In all cases, the data represent the latest, most readily available data to describe the housing market at the time the report was drafted. Key data sources include:

- American Community Survey (ACS) estimates from the United States Census Bureau;
- Colorado State Demography Office (SDO);
- Larimer County Assessor;
- Various market sources including Zillow Research and CoStar Group;
- United States Bureau of Labor Statistics (BLS);
- Longitudinal Employer-Household Dynamics (LEHD);
- Other local data sources on homelessness and affordable housing inventory.

It is important to note that data contain a margin of error—meaning the actual market data could be larger or smaller than the estimate. Margin of error risk is greater in small geographies. Given this, the data in this report should be interpreted as suggesting a likely number or magnitude of change rather than a definitive number or percentage, especially in smaller jurisdictions.

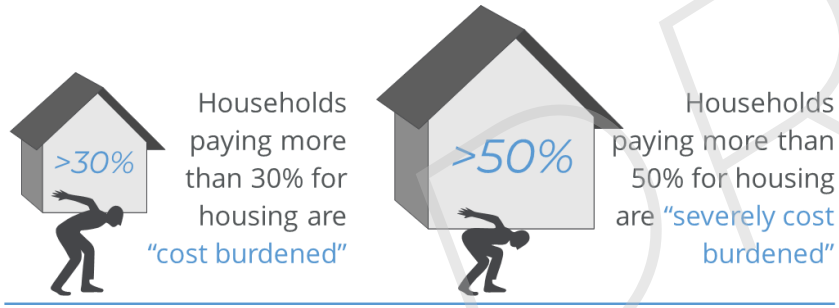
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INTRODUCTION

Defining and measuring affordability. The most common definition of housing affordability is linked to industry standards. The federal government considers housing as affordable when the housing payment—the rent or mortgage payment plus taxes and utilities—consumes 30% or less of a household's gross income. Households paying more than 30% are "cost burdened." Households experiencing cost burden have less money to spend on other essentials like healthcare, education, groceries, and transportation—adversely affecting their household well-being, limiting their economic growth potential, and constraining local spending.

Federal definition of affordability

1) Housing costs are "affordable" if they do not exceed 30% of household's gross monthly income
2) "Costs" include basic utilities, mortgage insurance, HOA fees, and property taxes



Income and AMI. The HNA analysis uses both household income ranges and "Area Median Income (AMI)." AMI is a measure of income based on the median, or middle income household. Housing programs base program eligibility on income limits that are represented as percentages of AMI. HUD publishes current-year income limits based on an internal calculation that estimates AMIs by household size and region. The income limits and AMIs that apply to Larimer County and its jurisdictions (for 2025) are shown below.

	Persons in Family				
	1	2	3	4	5
30% AMI	$26,850	$30,650	$34,500	$38,300	$41,400
50% AMI	$44,700	$51,050	$57,450	$63,800	$68,950
80% AMI	$71,500	$81,700	$91,900	$102,100	$110,300
100% AMI	$89,400	$102,100	$114,900	$127,600	$137,900
120% AMI	$107,280	$122,520	$137,880	$153,120	$165,480

Source: HUD Income Limits and Root Policy Research.

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INTRODUCTION

WHY WORK TO ADDRESS HOUSING NEEDS?

A balanced housing stock accommodates a full "life cycle community"—where there are affordable housing options for residents of all stages of life from young adults to centenarians—which in turn supports the local economy and contributes to Larimer County's culture and community.

- Research shows that a constrained housing market negatively impacts economic growth while stable and affordable housing is central to the health of individuals, families, and communities.
- Households living in stable housing are more likely to spend their incomes in the local economy through direct spending on goods and services.
- Housing investments that allow workers to live near their place of employment can reduce the impacts of traffic and commuting, and attract new businesses by increasing recruitment of talent, productivity, and retention of talent.
- Affordable housing (both naturally occurring affordable housing and income restricted Affordable housing) is key to providing high quality public services as many essential workers (e.g., first responders, medical professionals, and teachers) often leave communities that do not have an adequate supply of housing in their price range.
- Affordable housing, particularly income-restricted and/or publicly assisted housing, also plays a key role in preventing and resolving homelessness.
- Generational wealth from affordable homeownership is a major contributor to positive outcomes for children and youth. As housing and equity are passed down, young adults have the option to remain in their community and have families of their own.
- Housing investments and stable housing environments bolster local revenue, increase job readiness, help renters transition to homeownership, lower public costs of eviction and foreclosure, and increase the economic and educational opportunities for children.



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SECTION I. DEMOGRAPHIC TRENDS

The Demographic Trends section sets the foundation for understanding population and household characteristics, household income, and changes over time. These factors directly influence the demand for housing and the types and prices of housing needed in Larimer County, Loveland, and Fort Collins.

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SECTION I. DEMOGRAPHIC TRENDS

POPULATION

Larimer County is home to about 364,000 residents. Nearly half (47%) live in Fort Collins, 21% live in Loveland, 14% live in other incorporated areas, and 18% live in unincorporated Larimer County. The county overall has added about 25,000 residents since 2018, a population increase of 8%. Growth is concentrated in incorporated areas, particularly those along the I-25 corridor. Figure I-1 shows the Larimer County population by municipality along with changes in population between 2010 and 2023.

Figure I-1. Population Trends by Community, 2010 to 2023

Source:

2010, 2018, and 2023 5-year ACS, and Root Policy Research.

Jurisdiction	Population			% of County			Pop. Change 2018-2023		Population Change 2018-23 Charted (#)
	2010	2018	2023	2010	2018	2023	Num.	Pct.	-1,000 1,000 3,000 5,000 7,000
Larimer County	**291,162**	**338,161**	**363,561**	**100%**	**100%**	**100%**	**25,400**	**8%**	
Unincorporated Areas	66,123	67,235	66,517	23%	20%	18%	-718	-1%	
Laporte	2,426	2,411	2,123	1%	1%	1%	-288	-12%	
Red Feather Lakes	202	443	347	0%	0%	0%	-96	-22%	
Other Unincorporated	63,495	64,381	64,047	22%	19%	18%	-334	-1%	
Incorporated Areas	225,039	270,926	297,044	77%	80%	82%	26,118	10%	
Fort Collins	140,082	162,511	169,705	48%	48%	47%	7,194	4%	
Loveland	64,105	75,395	77,350	22%	22%	21%	1,955	3%	
Wellington	5,648	8,571	11,538	2%	3%	3%	2,967	35%	
Timnath	447	2,922	8,007	0%	1%	2%	5,085	174%	
Estes Park	5,820	6,297	5,879	2%	2%	2%	-418	-7%	
Berthoud (Larimer portion only)	5,023	6,471	11,420	2%	2%	3%	4,949	76%	
Windsor (Larimer portion only)	3,816	6,718	8,215	1%	2%	2%	1,497	22%	
Johnstown (Larimer portion only)	98	2,041	4,930	0%	1%	1%	2,889	142%	

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SECTION I. DEMOGRAPHIC TRENDS

Forecasted growth. Population forecasts from the State Demographer indicate continued steady growth through 2050 and a slight increase in Larimer County's share of the total state population. In other words, the county is anticipated to grow faster than the state overall (27% increase 2025-2050 in Larimer compared to 24% statewide).

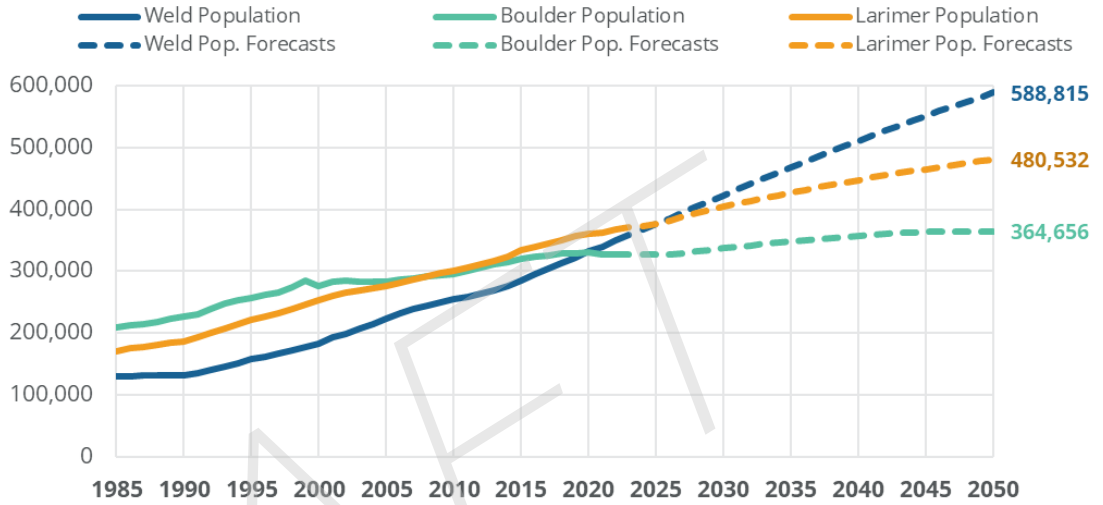
Neighboring Weld County is expected to grow at an even faster rate and is expected to surpass Larimer County's total population in 2026.

Figure I-2 shows population trends and forecasts through 2050; Weld County and Boulder County are included for comparison.

Age. In line with state and national trends, Larimer County is aging: Figure I-3 shows a substantial increase in the population over 65—by number and proportion—and forecasts show a continuation of that trend through 2050.

Age trends are an important indicator of future housing needs as it can be a driver of both housing preferences (size, location, etc.) as well as accessibility needs (residents over 65 significantly more likely to have a mobility difficulty).

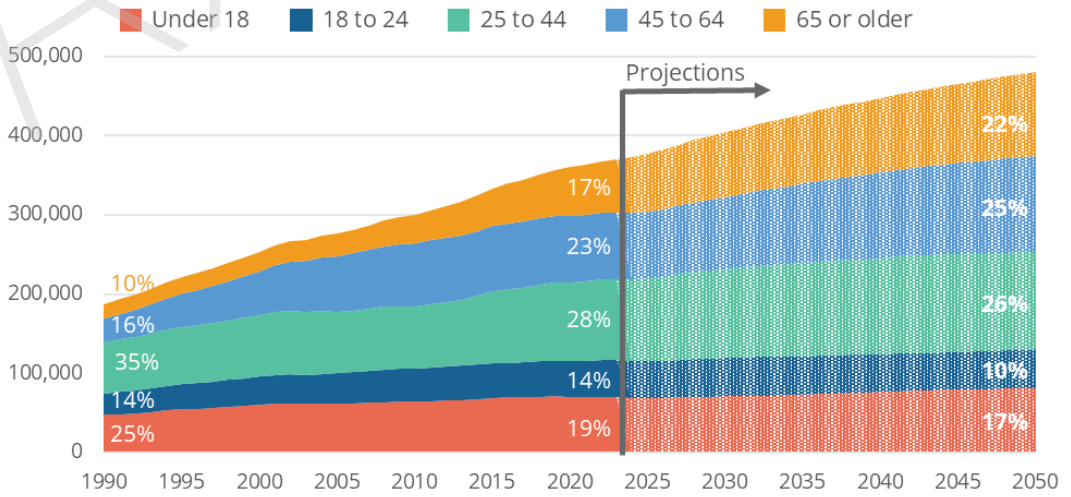
Figure I-2. Population Growth and Forecasts, Larimer County, 1985-2050



Note: Additional detail on forecast methodology available at https://demography.dola.colorado.gov/population

Source: Colorado Department of Local Affairs and Root Policy Research.

Figure I-3. Population by Age, Larimer County, 1990-2050



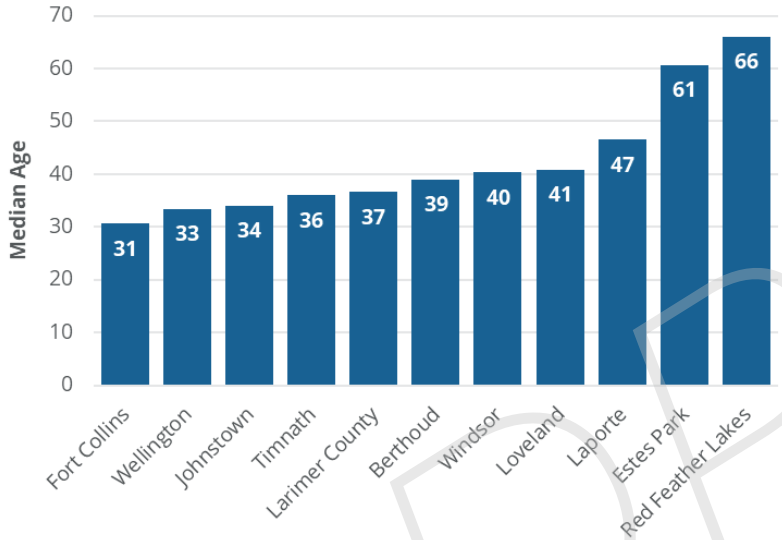
Source: Colorado Department of Local Affairs and Root Policy Research.

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SECTION I. DEMOGRAPHIC TRENDS

Age varies widely among communities within the County, as indicated by the median ages of each community shown in Figure I-4. Red Feather Lakes and Estes Park are notably older (median age over 60), while Fort Collins and Wellington have the youngest median age (31 and 33, respectively)—driven by college residents in Fort Collins and by the presence of families with children in Wellington.

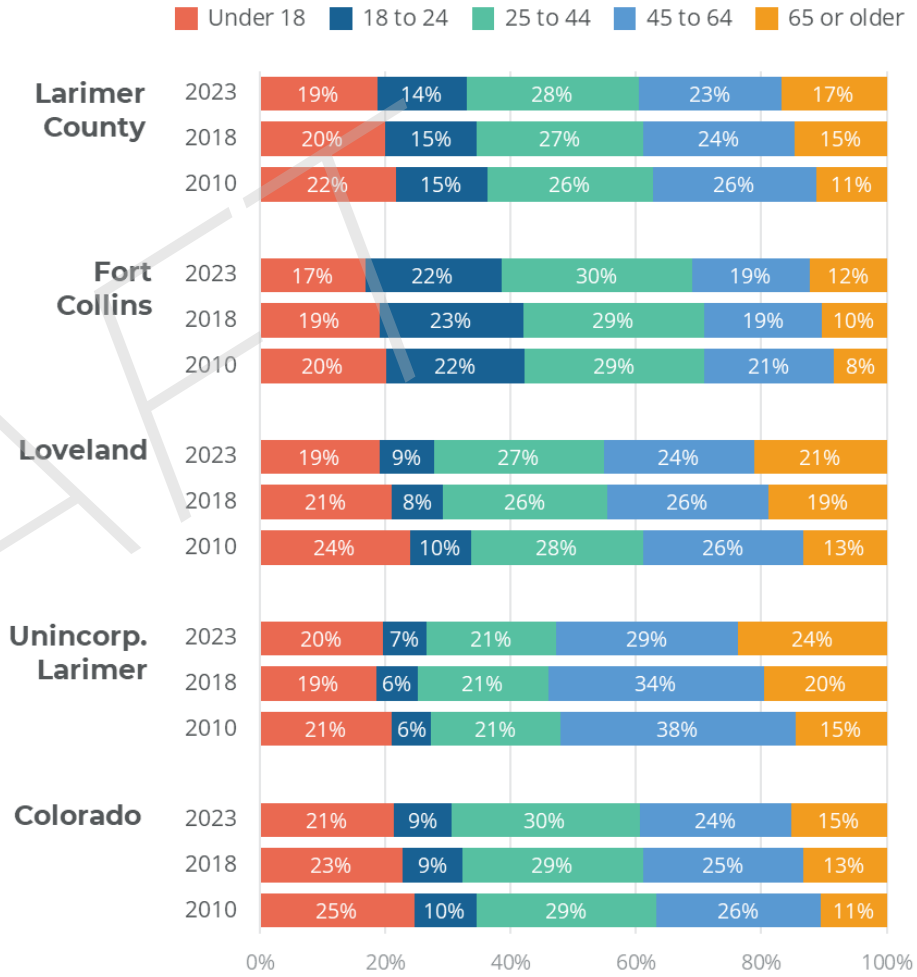
Figure I-4. Median Age by Community, 2023



Source: 2023 5-yr ACS and Root Policy Research.

Compared to Colorado, Larimer County has a higher proportion of 18-24 years olds (driven by Colorado State University students in Fort Collins) as well as a higher proportion of older adults (highest in unincorporated areas). Fort Collins and Loveland both show proportional declines in children under 18 as a percentage of total population. See Figure I-5 for details.

Figure I-5.
Age Distribution by Community, 2010, 2018, 2023



Source: 2010, 2018, 2023 5-yr ACS and Root Policy Research.

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SECTION I. DEMOGRAPHIC TRENDS

Race/ethnicity. Overall, Larimer County residents predominantly identify as non-Hispanic White (80%). Thirteen percent identify as Hispanic, 2% as Asian, 1% as Black or African American and 4% as other or multiple races.

- The racial and ethnic distribution is similar in unincorporated areas but reflects a somewhat higher proportion of non-Hispanic White residents (84%) offset by a lower proportion of minority residents.
- Loveland reflects a similar composition to the county overall, but with a slightly higher Hispanic population (15%).
- Fort Collins has a slightly lower proportion of non-Hispanic white residents (78%) and Hispanic residents (12%) but a slightly higher proportion of Asian residents relative to the county.

Figure I-6.
Racial/Ethnic Distribution by Community, 2023

	Larimer County	Fort Collins	Loveland	Unincorp. Larimer
Total Population	**363,561**	**169,705**	**77,350**	**66,517**
Non-Hispanic White	80%	78%	80%	84%
Hispanic	13%	12%	15%	12%
Two or more races	4%	4%	3%	3%
Asian	2%	3%	1%	0%
Black/African American	1%	1%	1%	1%
Other race	1%	1%	1%	1%

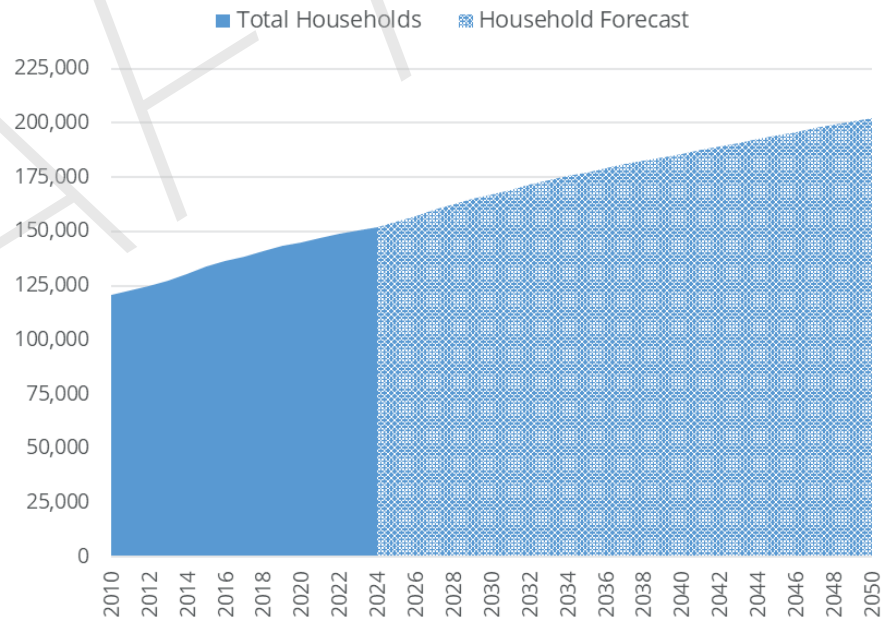
Notes; All race categories reflect non-Hispanic identification.

Source: 2023 5-yr ACS and Root Policy Research.

HOUSEHOLDS

As of 2023, Larimer County's 364,000 residents were living in 151,571 households (average household size of 2.4 people per household). State demographer projections expect a 15% increase in households over the next 10 years and continued steady growth through 2050. Projected growth is similar to recent historical growth.

Figure I-7.
Total Households and Projections, 2010-2050



Source: Colorado Department of Local Affairs and Root Policy Research.

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SECTION I. DEMOGRAPHIC TRENDS

Figure I-8 shows population trends across communities in Larimer County. Similar to population growth, household growth is concentrated in incorporated areas. The highest numerical growth occurred in Fort Collins, which added about 18,000 households between 2018 and 2023. The largest percentage change was in Timnath and the Larimer portion of Johnstown—both communities more than tripled their households between 2018 and 2023.

Figure I-8. Household Trends by Community, 2010 to 2023

Source:

2010, 2018, and 2023 5-year ACS, and Root Policy Research.

Jurisdiction	Households			% of County			HH. Change 2018-2023		HH Change 2018-2023 Charted (#)
	2010	2018	2023	2010	2018	2023	Num.	Pct.	-1,000 1,000 3,000 5,000 7,000
Larimer County	**117,415**	**133,527**	**151,571**	**100%**	**100%**	**100%**	**18,044**	**14%**	
Unincorporated Areas	26,794	26,839	26,654	23%	20%	18%	-185	-1%	
Laporte	1,139	1,056	1,053	1%	1%	1%	-3	0%	
Red Feather Lakes	104	240	192	0%	0%	0%	-48	-20%	
Other Unincorporated	25,551	25,543	25,409	22%	19%	17%	-134	-1%	
Incorporated Areas	90,621	106,688	124,917	77%	80%	82%	18,229	17%	
Fort Collins	55,889	62,796	70,782	48%	47%	47%	7,986	13%	
Loveland	26,488	31,285	34,475	23%	23%	23%	3,190	10%	
Wellington	2,040	2,820	4,018	2%	2%	3%	1,198	42%	
Timnath	165	881	2,658	0%	1%	2%	1,777	202%	
Estes Park	2,830	3,210	3,025	2%	2%	2%	-185	-6%	
Berthoud (Larimer portion only)	1,947	2,564	4,431	2%	2%	3%	1,867	73%	
Windsor (Larimer portion only)	1,219	2,411	3,353	1%	2%	2%	942	39%	
Johnstown (Larimer portion only)	43	721	2,175	0%	1%	1%	1,454	202%	

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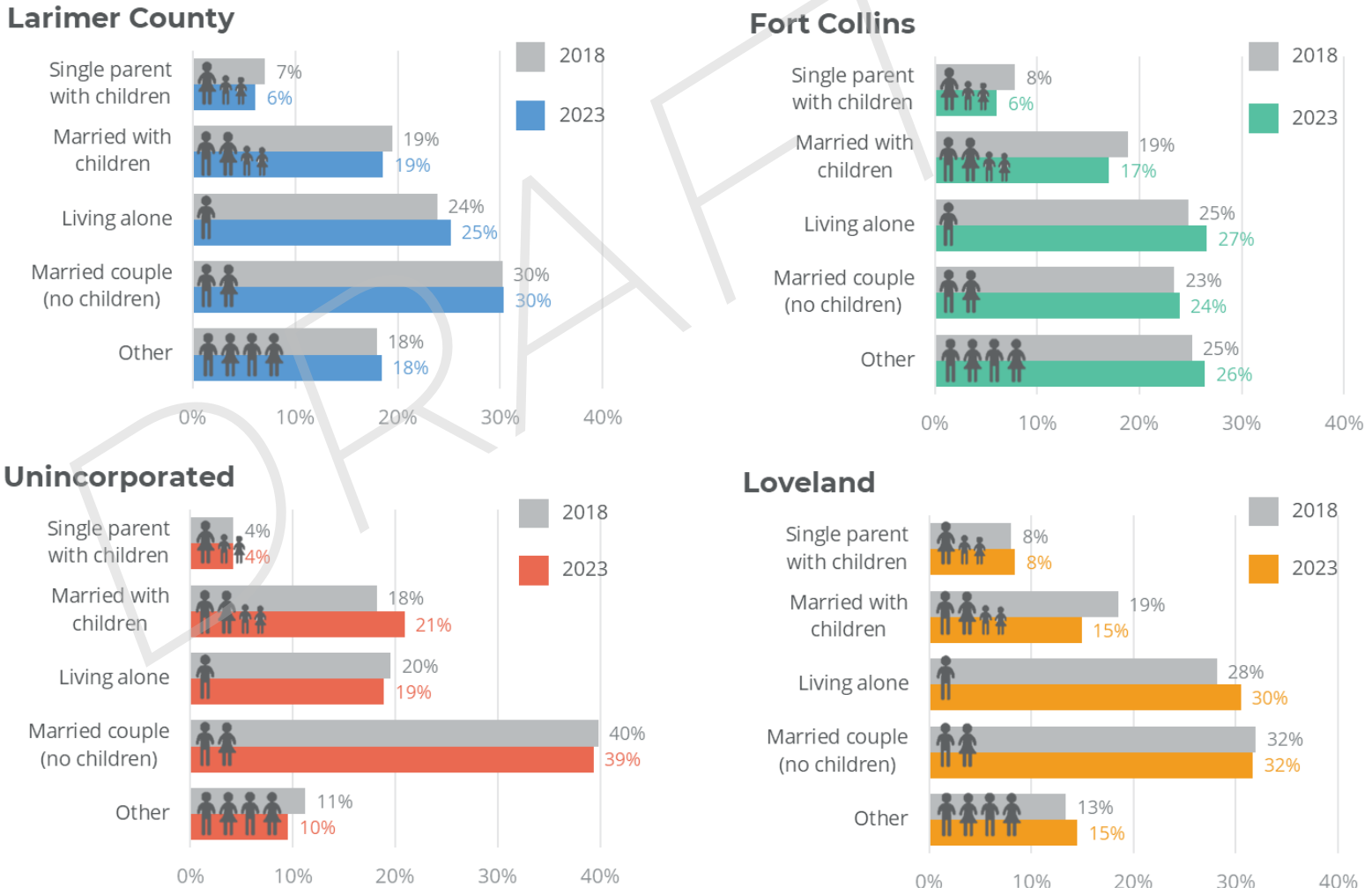
SECTION I. DEMOGRAPHIC TRENDS

Household type. The most common household type in both the county overall and in unincorporated areas is married couples without children (this includes empty-nesters, whose children no longer live at home). Loveland's household distribution also has a high proportion of married couples without children but a nearly equivalent proportion of householders living alone. Fort Collins is impacted more than other communities by roommate ("other") households, which is similar to its proportion of single person households and married couples with no children. The proportion of households with children declined in Larimer County overall, Fort Collins and Loveland, but increased in unincorporated areas. Figure I-9 shows the number of households by type in both 2018 and 2023 for Larimer County, unincorporated areas, Fort Collins and Loveland.

Figure I-9. Household Type, 2018 and 2023

Source:

2018, and 2023 5-year ACS, and Root Policy Research.



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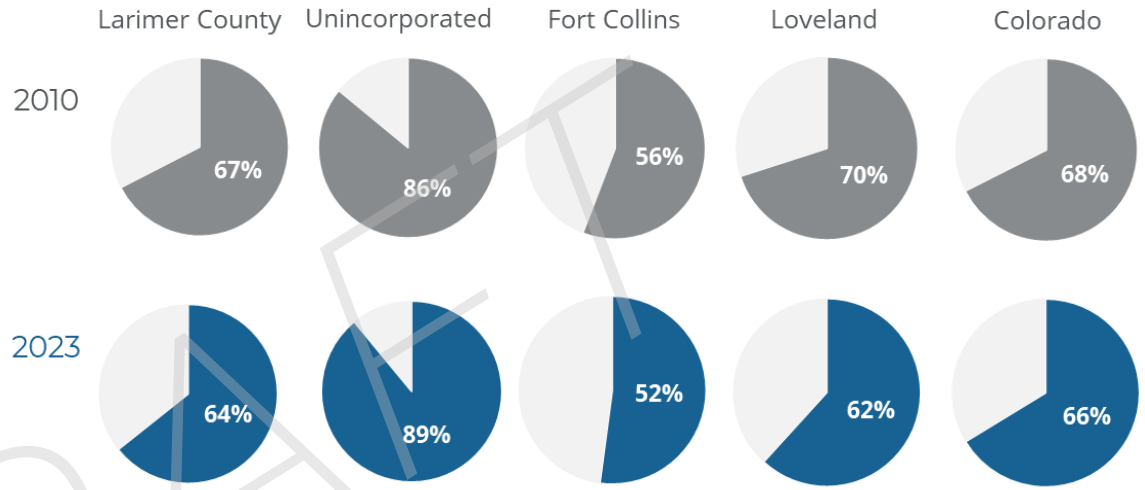
SECTION I. DEMOGRAPHIC TRENDS

Tenure. The current ownership rate in Larimer County is 64%--meaning 64% of households are owner-occupied and the remainder, 36%, are renter-occupied. As shown in Figure I-10, the ownership rate in Larimer County (and in Fort Collins and Loveland) has declined slightly since 2010, similar to statewide trends.

Declines in homeownership can be a positive event when it reflects an increase in needed rental development. However, it can also reflect barriers to accessing homeownership.

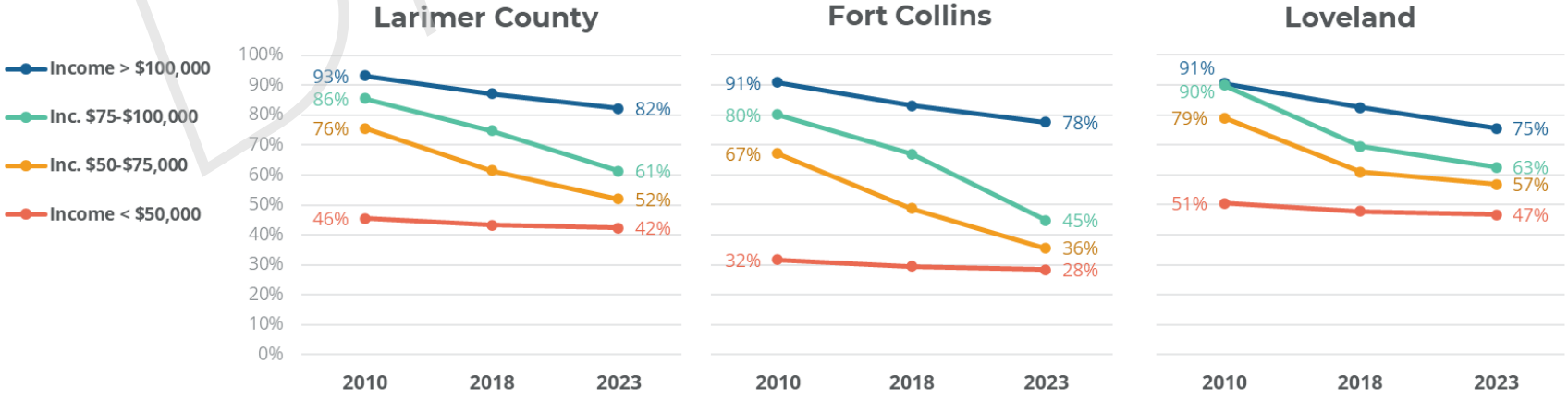
Figure I-11 shows homeownership trends by income and shows that the largest declines in ownership were among households earning between $50,000 and $100,000—historically a common range for first-time buyers. (Note that the stable rate of ownership among households with income <$50,000, likely reflects older householders with lower retirement incomes but high home equity).

Figure I-10.
Homeownership Rate, 2010 and 2023



Source: 2010 and 2023 5-year ACS, and Root Policy Research.

Figure I-11.
Homeownership Rate by Household Income 2023



Source:
2023 5-year ACS, and Root Policy Research.

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SECTION I. DEMOGRAPHIC TRENDS

HOUSEHOLD INCOME & POVERTY

Household income. The median income in Larimer County is $91,364, similar to the statewide median of $92,470. Loveland and Fort Collins have similar, but lower medians at $82,600 and $83,600, respectively. Timnath has the highest median income among other Larimer communities. Figures I-12 shows median income by tenure for Larimer County and Communities.

In all communities, renter households have a lower median income than owner households, though that gap narrowed slightly over the past 5 years as the median renter income rose faster than the median income for owners (see Figure I-13 on the following page).

Countywide, the median income for owners rose 31% between 2018 and 2023, while the median renter income rose 45%—both outpacing inflation, which was 21% over the same period (according to the Consumer Price Index). However, as will be discussed in subsequent sections, income gains were not sufficient to keep up with housing price and rent increases.

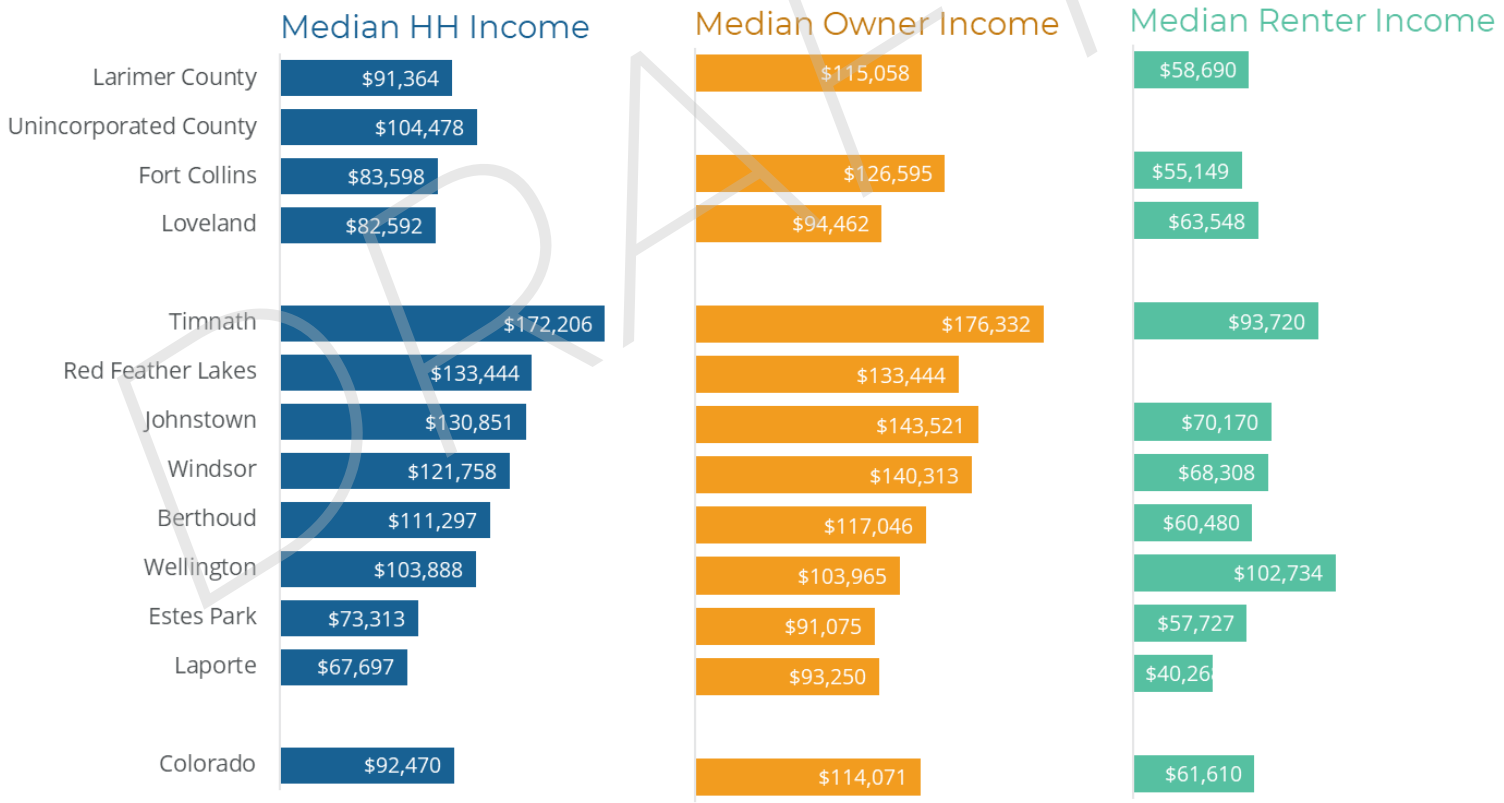
Figure I-12. Median Income by Tenure, Larimer County and Communities, 2023

Note:

The ACS data on median income reflects the median regardless of household size. The average household size in Larimer County is 2.25 (2.41 for owners and 1.98 for renters).

Source:

2023 5-year ACS, and Root Policy Research.

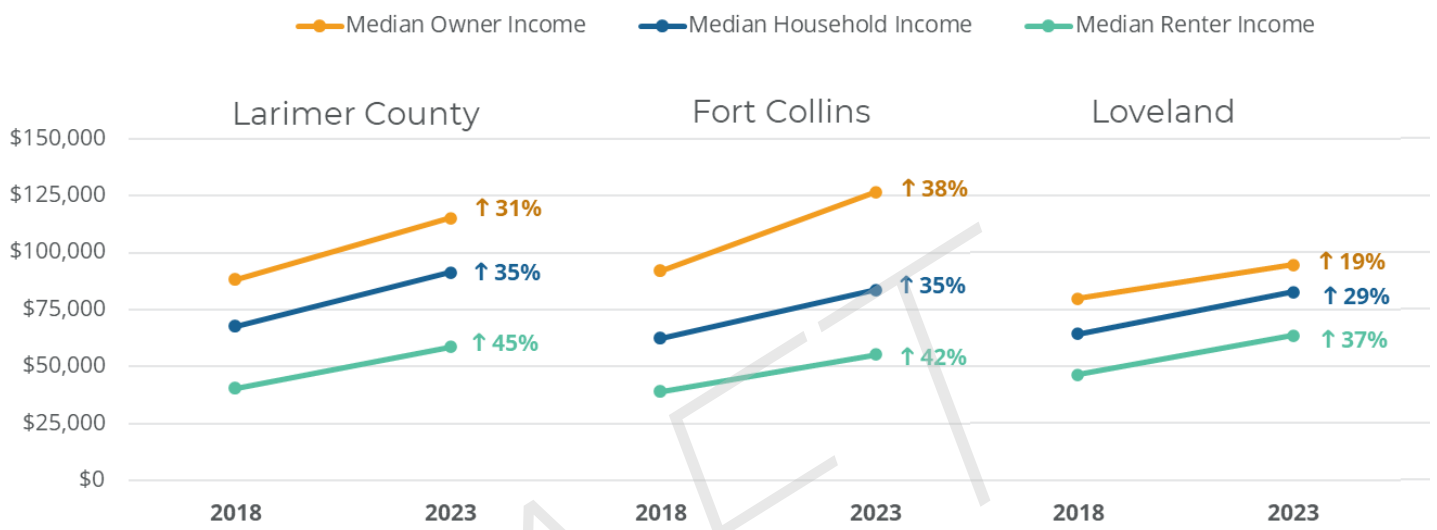


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SECTION I. DEMOGRAPHIC TRENDS

Figure I-13.
Median Income Trends by Tenure, 2010 and 2023

Source:
2010 and 2023 5-year ACS, and Root Policy Research.



HUD Area Median Income. The data presented in the previous figures reflect ACS data on household income, as reported by households responding to the Census Bureau's annual survey. Housing programs, however, rely on income limits published by the U.S. Department of Housing and Urban Development (HUD) that are represented as percentages of the Area Median Income (commonly abbreviated as "HUD AMI" or simply "AMI").

HUD publishes current-year income limits based on an internal calculation that estimates AMIs by household size and region. All communities within Larimer County use the same AMIs for program eligibility. Figure I-14 shows the income limits and AMIs that apply to Larimer County and its jurisdictions in 2025.

Figure I-14.
2025 HUD AMI for Larimer County and its Communities

	Persons in Family				
	1	2	3	4	5
30% AMI	$26,850	$30,650	$34,500	$38,300	$41,400
50% AMI	$44,700	$51,050	$57,450	$63,800	$68,950
80% AMI	$71,500	$81,700	$91,900	$102,100	$110,300
100% AMI	$89,400	$102,100	$114,900	$127,600	$137,900
120% AMI	$107,280	$122,520	$137,880	$153,120	$165,480

Source: HUD Income Limits and Root Policy Research.

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SECTION I. DEMOGRAPHIC TRENDS

Figure I-15 estimates the number of households that fall into each AMI category (using 2023 ACS data matched with the 2023 HUD AMI) in Larimer County and in unincorporated areas. Half of Larimer County households and 43% of unincorporated households fall below the HUD median income (100% AMI). Among renters, 72% countywide and 68% in unincorporated areas fall below 100% AMI.

Figure I-15. Larimer County (and Unincorporated) Households by HUD AMI Levels

	Number of Houesholds			Percent of HH		
Household Income	**Renter**	**Owners**	**Total**	**Renter**	**Owners**	**Total**
Larimer County	59,053	102,411	161,464	100%	100%	100%
Less than 30% AMI	12,952	8,112	21,063	22%	8%	13%
30% to 50% AMI	8,080	7,525	15,605	14%	7%	10%
50% to 80% AMI	15,760	14,293	30,054	27%	14%	19%
80% to 100% AMI	5,958	9,083	15,041	10%	9%	9%
100% to 120% AMI	4,042	7,972	12,015	7%	8%	7%
120% AMI +	12,261	55,426	67,686	21%	54%	42%
Unincorporated	2,934	23,720	26,654	100%	100%	100%
Less than 30% AMI	546	1,929	2,475	19%	8%	9%
30% to 50% AMI	488	2,045	2,533	17%	9%	10%
50% to 80% AMI	717	3,288	4,004	24%	14%	15%
80% to 100% AMI	256	2,307	2,563	9%	10%	10%
100% to 120% AMI	224	2,009	2,234	8%	8%	8%
120% AMI +	703	12,142	12,845	24%	51%	48%

Note: Root Policy Research estimate based on 2023 ACS data and 2023 income limits
Source: HUD Income Limits and Root Policy Research.

Data for Fort Collins and Loveland are shown in subsequent figures. Note that because the median is based on countywide thresholds, the distributions above and below median in communities *within* the county (i.e., Loveland and Fort Collins) won't reflect a mathematical 50% above/below median. In Fort Collins, 57% of all households and 75% of renter households are below 100% AMI. In Loveland, 52% of all households and 69% of renter households are below 100% AMI.

Figure I-16. Fort Collins Households by HUD AMI Levels

	Number of Houesholds			Percent of HH		
Household Income	**Renter**	**Owners**	**Total**	**Renter**	**Owners**	**Total**
Fort Collins	36,654	38,160	74,814	100%	100%	100%
Less than 30% AMI	8,400	2,589	10,989	23%	7%	15%
30% to 50% AMI	5,649	2,258	7,907	15%	6%	11%
50% to 80% AMI	10,383	6,419	16,803	28%	17%	22%
80% to 100% AMI	3,174	4,009	7,183	9%	11%	10%
100% to 120% AMI	2,020	2,998	5,019	6%	8%	7%
120% AMI +	7,026	19,886	26,913	19%	52%	36%

Note: Root Policy Research estimate based on 2023 ACS data and 2023 income limits.
Source: HUD Income Limits and Root Policy Research.

Figure I-17. Loveland Households by HUD AMI Levels

	Number of Houesholds			Percent of HH		
Household Income	**Renter**	**Owners**	**Total**	**Renter**	**Owners**	**Total**
Loveland	12,342	22,309	34,651	100%	100%	100%
Less than 30% AMI	3,612	2,034	5,646	29%	9%	16%
30% to 50% AMI	1,127	2,067	3,193	9%	9%	9%
50% to 80% AMI	2,433	3,237	5,670	20%	15%	16%
80% to 100% AMI	1,386	1,966	3,352	11%	9%	10%
100% to 120% AMI	1,047	1,830	2,877	8%	8%	8%
120% AMI +	2,737	11,176	13,913	22%	50%	40%

Note: Root Policy Research estimate based on 2023 ACS data and 2023 income limits
Source: HUD Income Limits and Root Policy Research.

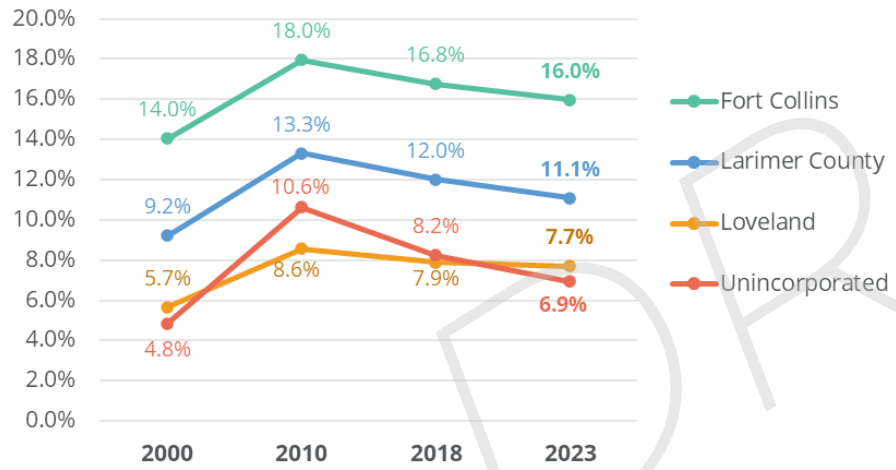
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SECTION I. DEMOGRAPHIC TRENDS

Poverty. Poverty trends in Larimer County, Fort Collins, and Loveland are shown in Figure I-18. Across the time studied, poverty was highest in Fort Collins (driven primarily by the college-aged population). Current poverty rates are 16% in Fort Collins, 11% in Larimer County overall, 8% in Loveland, and 7% in unincorporated areas.

Poverty rates increased with the Great Recession, represented in the figure by 2010 estimates. Poverty rates gradually decreased in the late 2010s and early 2020s though they remain higher than 2000 levels.

Figure I-18.
Individual Poverty Rate, 2000 - 2023



Source: 2000 Decennial Census; 2010, 2018, and 2023 5-year ACS; and Root Policy Research.

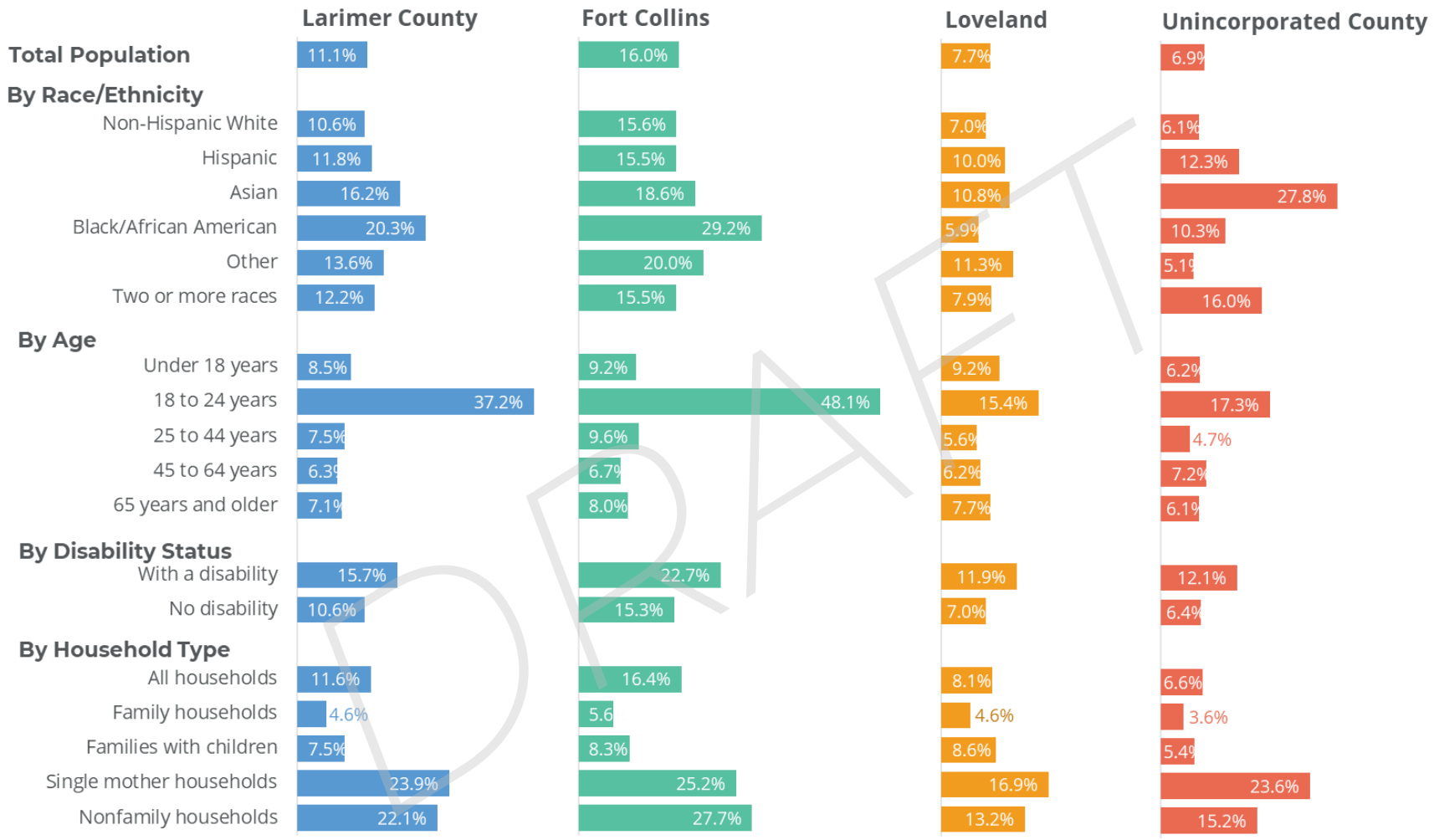
Figure I-19 (on the following page) presents poverty rates in Larimer County by demographic characteristics. Key findings are outlined here. Some racial/ethnic groups, college-aged residents, residents with disabilities, and single mother households all experience disproportionately high poverty rates.

- Among racial/ethnic groups, Black/African American residents have the highest poverty rates, except in Loveland where racial/ethnic poverty disparities are less pronounced. It should be noted that some racial/ethnic groups presented in the figure are fairly small, particularly in Loveland and Unincorporated areas so results should be interpreted with caution.
- College-aged residents have the highest poverty rate in all jurisdictions. Countywide and in Loveland, children have the next highest poverty rate (8.5% in Larimer and 9.2% in Loveland).
- About 16% of individuals with disabilities are living in poverty in Larimer County, compared to 11% of residents without disabilities. Disparities are similar in Fort Collins, Loveland, and unincorporated areas.
- Single mothers are three times more likely than other families with children to live in poverty in Larimer County and Fort Collins (and twice as likely in Loveland).

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SECTION I. DEMOGRAPHIC TRENDS

Figure I-19. Poverty Rate by Demographic Characteristics



Source: 5-year ACS estimates and Root Policy Research.

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SECTION II. ECONOMIC TRENDS

The Economic Trends section provides context related to jobs, wages, employment rates, and commuting patterns to show whether housing is meeting the needs of the workforce.

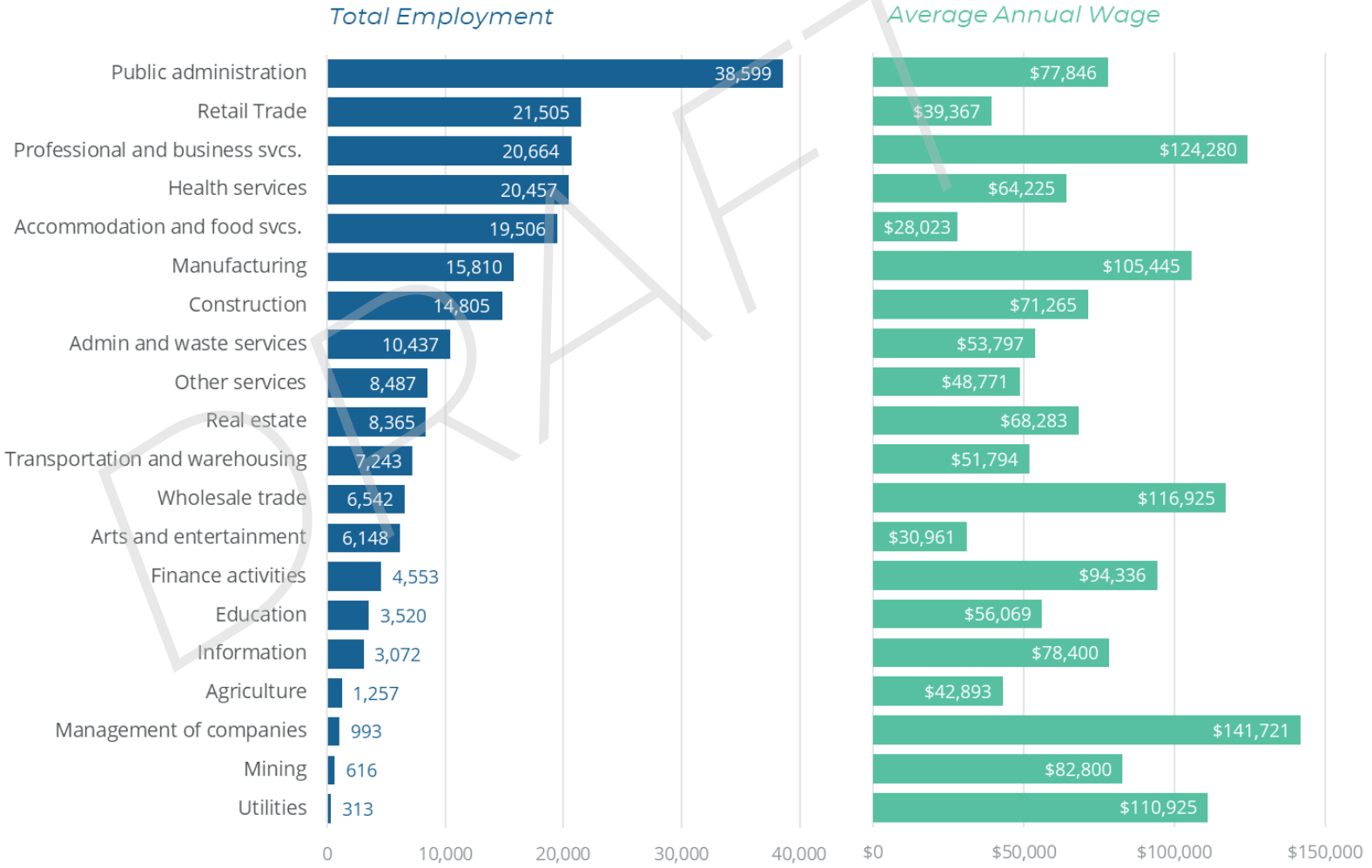
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SECTION II. ECONOMIC TRENDS

JOBS & INDUSTRIES

According to jobs data from the Colorado State Demography Office (SDO), Public Administration (i.e., federal, state, and local government) is the largest industry in the county, followed by retail, professional services, healthcare, and hospitality (accommodation and food services). It is important to note that the SDO office classifies higher education (i.e., Colorado State University) as public administration. Average wages range widely among the top industries with professional services ranking among the highest paying industries and retail and hospitality averaging among the lowest.

Figure II-1. Employment and Wages, Larimer County, 2023



Note:

SDO data include higher education in the government, or public administration sector.

Source:

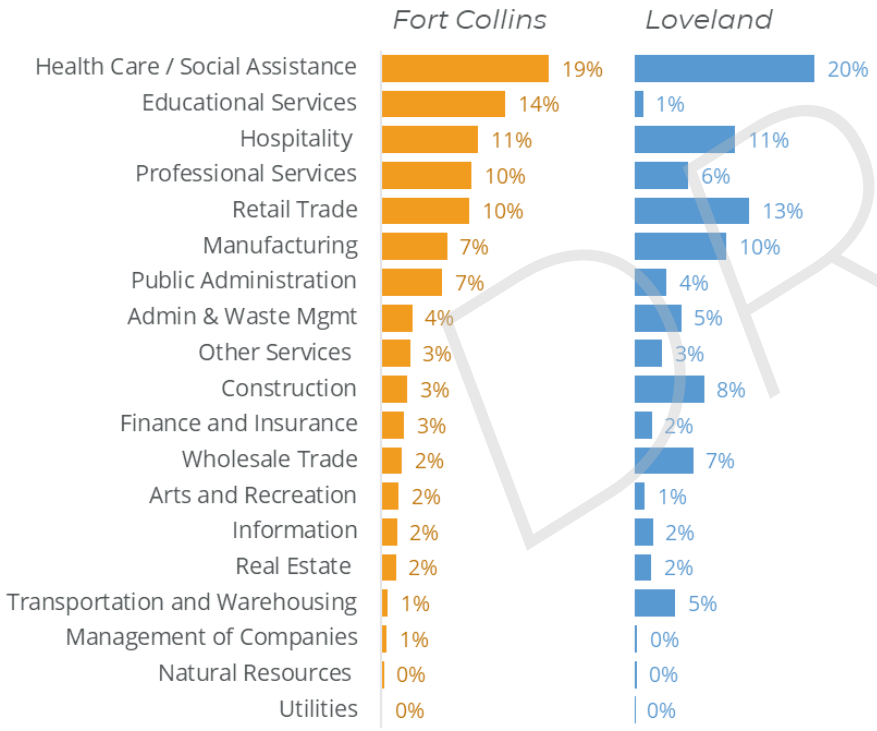
Total employment from DOLA State Demography Office (SDO); average annual wage from BLS QCEW; data analysis by Root Policy Research.

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SECTION II. ECONOMIC TRENDS

SDO does not provide job county by jurisdiction but job estimates from the Longitudinal Employer-Household Dynamics (LEHD), suggest that just over half of the county's jobs (55%) are located in Fort Collins and about a quarter (24%) are located in Loveland. Figure II-2 shows the industry distribution of Fort Collins and Loveland jobs based on LEHD data. Note that LEHD data classify CSU jobs under "education" rather than public administration (differs from the county data presented in Figures II-1 and II-4). The largest industries in Fort Collins in health care, education, and hospitality. In Loveland, the largest industries are health care, retail, and hospitality.

Figure II-2.
Industry Distribution, Fort Collins and Loveland, 2023



Sources: LEHD data on "All Jobs," and Root Policy Research.

Job and wage trends. Figure II-3 below compares job growth to population and household growth in Larimer County between 2010 and 2023. Job growth rapidly outpaced household growth between 2010 and 2018. In subsequent years, 2018-2023, job growth was slower, though still positive. Overall, between 2010 and 2023, the number of jobs in Larimer County increased by 38% while households increased by 29% (and population increased 25%).

Figure II-3.
Growth Comparison: Jobs, People, and Households, 2010-2023

	Jobs	Population	Households
Estimate			
2010	153,816	291,162	117,415
2018	196,194	338,161	133,527
2023	212,956	363,561	151,571
Percent Change			
2010-2018	28%	16%	14%
2018-2023	9%	8%	14%
2010-2023	38%	25%	29%

Source:
DOLA and Root Policy Research.

Figure II-4 on the following page shows job and wage trends by industry (2010, 2018, and 2023). The service sector is growing faster than the goods producing sector—and its wages increased more (34% over 5 years compared to 19%).

The highest growth industries by number of jobs were public administration, professional services, and transportation and warehousing. The highest percentage changes were transportation and warehousing, wholesale trade, and professional services.

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SECTION II. ECONOMIC TRENDS

Figure II-4. Job and Wage Trends by Industry, Larimer County, 2010-2023

Job Sector	Total Employment			Employment Growth 2018-2023		Average Annual Wages			Wage Growth 2018-2023	
	2010	2018	2023	# Change	% Change	2010	2018	2023	$ Change	% Change
Total Jobs	**153,816**	**196,194**	**212,956**	**16,762**	**9%**	**$40,806**	**$51,796**	**$67,494**	**$26,688**	**30%**
Goods Producing	**22,960**	**31,532**	**32,488**	**956**	**3%**	**$60,637**	**$74,627**	**$89,118**	**$28,481**	**19%**
Agriculture	874	1,201	1,257	56	5%	$28,302	$35,685	$42,893	$14,591	20%
Mining	525	700	616	-84	-12%	$46,061	$68,063	$82,800	$36,739	22%
Construction	10,385	14,632	14,805	173	1%	$44,940	$56,610	$71,265	$26,326	26%
Manufacturing	11,176	14,999	15,810	811	5%	$73,722	$91,188	$105,445	$31,723	16%
Service Providing	**130,815**	**164,633**	**180,404**	**15,771**	**10%**	**$37,353**	**$47,256**	**$63,382**	**$26,029**	**34%**
Utilities	252	276	313	37	13%	$68,556	$90,260	$110,925	$42,369	23%
Wholesale trade	3,324	5,250	6,542	1,292	25%	$53,071	$78,642	$116,925	$63,854	49%
Retail Trade	18,769	22,053	21,505	-548	-2%	$23,680	$29,326	$39,367	$15,687	34%
Transportation and warehousing	2,558	4,594	7,243	2,649	58%	$38,963	$46,039	$51,794	$12,831	13%
Information	2,952	3,524	3,072	-452	-13%	$48,722	$54,439	$78,400	$29,678	44%
Finance activities	4,072	4,577	4,553	-24	-1%	$50,967	$73,695	$94,336	$43,369	28%
Real estate	5,858	7,950	8,365	415	5%	$31,620	$51,003	$68,283	$36,663	34%
Professional and business services	13,987	16,977	20,664	3,687	22%	$69,407	$88,814	$124,280	$54,873	40%
Management of companies/enterprise	508	891	993	102	11%	$84,847	$182,121	$141,721	$56,874	-22%
Administrative and waste services	9,828	11,020	10,437	-583	-5%	$28,906	$38,561	$53,797	$24,891	40%
Education	1,872	3,054	3,520	466	15%	$39,091	$45,941	$56,069	$16,978	22%
Health services	18,262	18,463	20,457	1,994	11%	$42,583	$49,782	$64,225	$21,642	29%
Arts and entertainment	3,665	5,117	6,148	1,031	20%	$22,855	$26,035	$30,961	$8,106	19%
Accommodation and food services	14,533	19,601	19,506	-95	0%	$14,665	$20,516	$28,023	$13,358	37%
Other services, except public admin.	6,609	7,535	8,487	952	13%	$28,061	$36,474	$48,771	$20,710	34%
Public administration	23,766	33,751	38,599	4,848	14%	$55,219	$64,937	$77,846	$22,627	20%

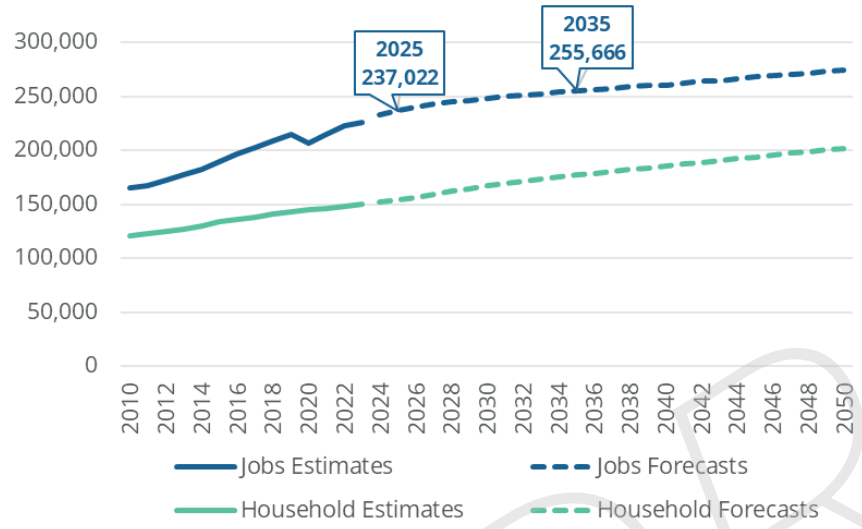
Source: DOLA SDO (employment), QCEW (wages) and Root Policy Research.

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SECTION II. ECONOMIC TRENDS

Job projections. Forecasts from DOLA SDO indicate continued job growth in the county, with an expected total employment of 255,666 by 2035 (16% increase over 2025). Over the next 10 years, households are expected to increase faster than jobs.

Figure II-5. Job and Household Forecasts,2023-2050



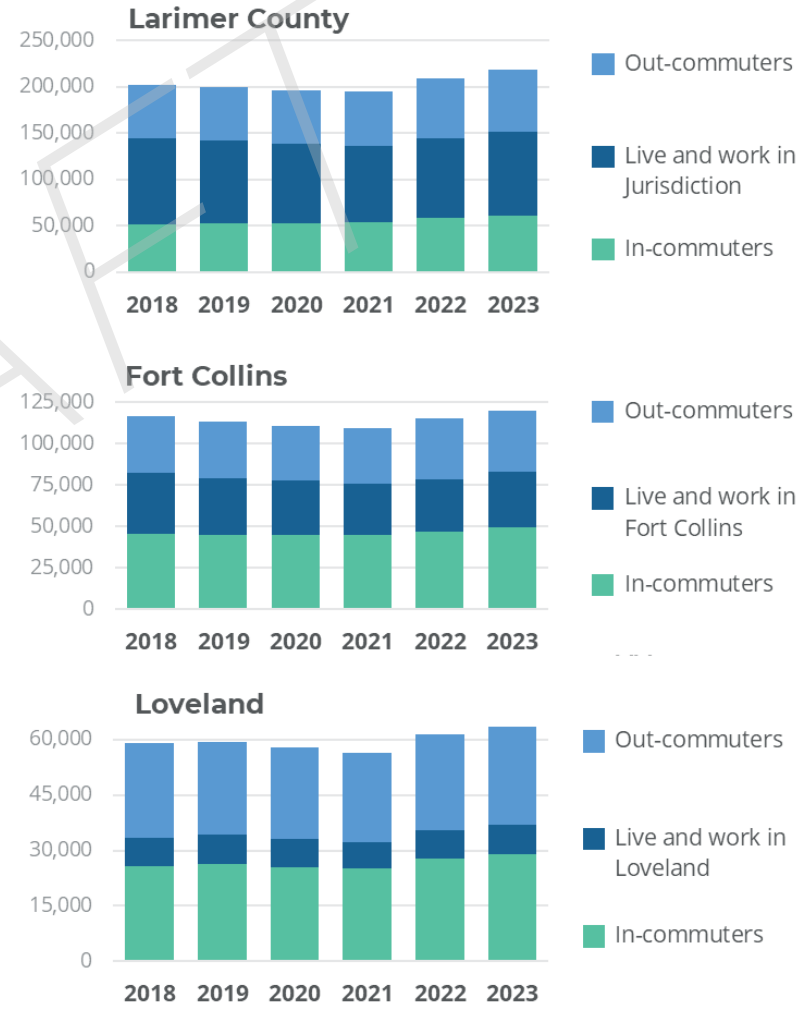
Source: DOLA and Root Policy Research.

COMMUTE PATTERNS

About 60% of primary jobs located in Larimer County are filled by county residents; the remaining 40% of primary jobs are filled by in-commuters. The proportion of in-commuters has increased gradually over time (from 36% in 2018). The proportion of residents who commute to jobs outside the county has also increased (from 39% in 2018 to 43% in 2023). Figure II-6 shows inflow and outflow of workers to and from Larimer County.

In Fort Collins, about 60% of jobs in the city are filled by in-commuters and in Loveland, the proportion is even higher (79%). Out-commuting is also common in Fort Collins (53% of working residents commute to jobs outside the city) and in Loveland (77% of working residents commute to jobs outside the city).

Figure II-6. Inflow/Outflow of Workers, 2018-2023



Source: LEHD and Root Policy Research.

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SECTION II. ECONOMIC TRENDS

Commuting origins/destinations. At the county level, most in-commuters are coming from Weld County, followed by Boulder County. Out commuting follows a similar pattern, with most workers that leave Larimer County for their job, heading to Weld, Boulder, or Denver counties.

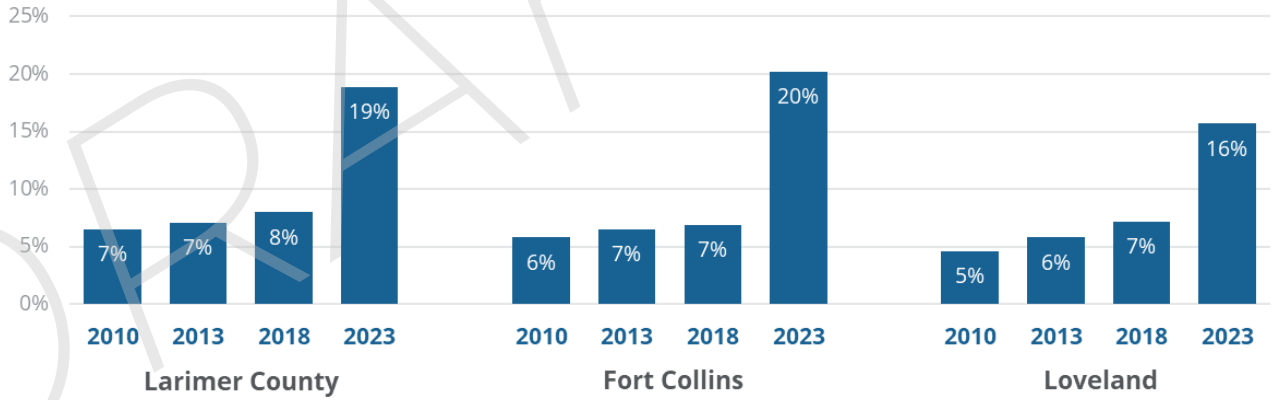
In Fort Collins, in-commuters are most likely to live in Loveland, Windsor or Greeley. Most out-commuters have jobs in Loveland, Denver or Greeley.

In Loveland, in-commuters are most likely to live in Fort Collins, Greeley, or Windsor. Most out-commuters have jobs in Fort Collins, Denver, Greeley, or Longmont.

Work from home. The COVID-19 pandemic increased the share of workers working from home across the country—including in Larimer County, Fort Collins, and Loveland (as shown in Figure II-7).

According to ACS estimates, 8% of Larimer County's workers worked from home in 2018. Following the pandemic, in 2023, 19% of Larimer County's employed population worked from home. Trends are similar in Fort Collins (20% of workers work from home) and in Loveland (16% of workers work from home).

Figure II-7.
Share of Employed Population Working From Home, 2010, 2013, 2018, and 2023



Source:

2010, 2013, 2018, and 2023 and 5-year ACS and Root Policy Research.

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SECTION III. HOUSING INVENTORY

The section discusses characteristics of the county's current housing supply, including diversity of housing types, the age of housing, stock, and housing production trends. It also provides an overview of unique submarkets including manufactured housing, short-term rental market; and designated affordable housing inventory.

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SECTION III. HOUSING INVENTORY

HOUSING SUPPLY

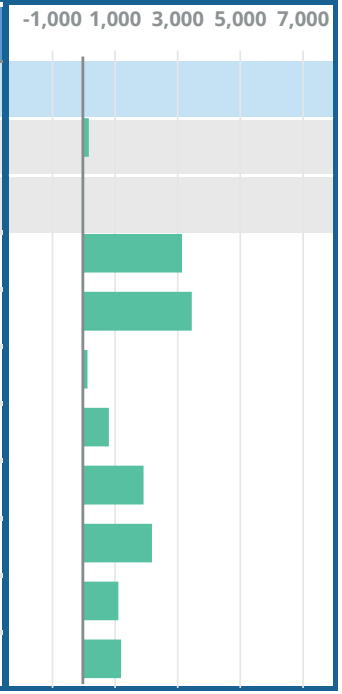
Larimer County has about 167,000 housing units, up 9% between 2018 and 2023. Long-term trends in the county (2010-2023) show economic growth outpacing housing production, but more recent trends (2018-2023) indicate housing production is on pace with job growth (9%), though still lagging growth in households (14%).

Figure III-1 shows the change in housing units since 2010, with a focus on changes since 2018. Smaller incorporated areas are growing rapidly (percentage basis) with Timnath more than doubling units over the past five years and the Larimer County portions of Berthoud and Johnstown growing by 67% and 65%, respectively.

Loveland growth (10%) was similar to the County overall (9%) while Fort Collins was lower (4%). Unincorporated areas had a net gain of 165 housing units (a near 0% change)—though this likely reflects some new construction offset by residential structure losses from the Cameron Peak Fire, which destroyed 192 homes/mobile homes[1].

Figure III-1. Housing Units by Community, 2010 to 2023

Jurisdiction	Housing Units			% of County			Unit Change 2018-2023		Unit Change 2018-23 Charted (#)
	2010	2018	2023	2010	2018	2023	Num.	Pct.	
Larimer County	**133,171**	**152,984**	**167,042**	**100%**	**100%**	**100%**	**14,058**	**9%**	
Unincorporated Areas	33,106	33,307	33,472	25%	22%	20%	165	0%	
Incorporated Areas	100,065	119,677	133,570	75%	78%	80%	13,893	12%	
Fort Collins	60,733	69,738	72,876	46%	46%	44%	3,138	4%	
Loveland	28,627	32,957	36,408	21%	22%	22%	3,451	10%	
Estes Park	4,113	4,335	4,458	3%	3%	3%	123	3%	
Wellington	2,281	3,625	4,429	2%	2%	3%	804	22%	
Timnath	243	1,524	3,430	0%	1%	2%	1,906	125%	
Berthoud (Larimer portion only)	2,064	3,268	5,447	2%	2%	3%	2,179	67%	
Windsor (Larimer portion only)	1,688	2,411	3,514	1%	2%	2%	1,103	46%	
Johnstown (Larimer portion only)	316	1,819	3,008	0%	1%	2%	1,189	65%	



Note:

DOLA housing unit counts do not include Census Designated Places in Unincorporated areas so data were unavailable for Laporte and Red Feather Lakes.

Source:

DOLA, and Root Policy Research.

[1] www.larimer.org/sites/default/files/assessors_office_cameron_peak_fire_report.pdf

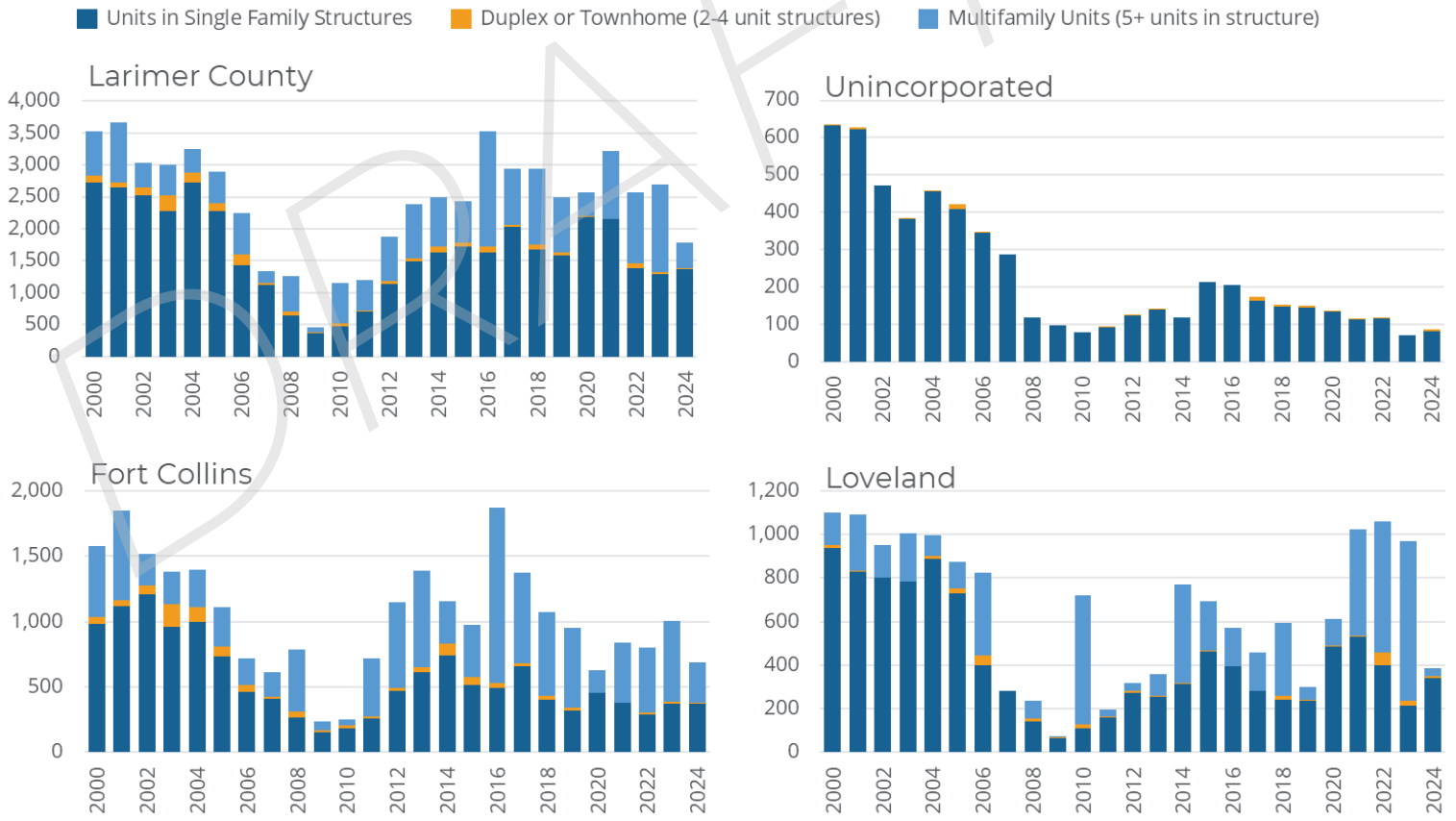
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SECTION III. HOUSING INVENTORY

Housing production. The rate of housing unit growth plays a key role in affordability: when growth cannot accommodate demand, prices rise. The way in which a community grows also affects affordability: Some housing types are less expensive to construct than creating natural price diversity. Residential development activity in Larimer, its unincorporated areas, Fort Collins, and Loveland is summarized in Figure III-2. The scale is adjusted on each figure to maximize visibility based on each jurisdiction's permit volume. Data reflect Census SOCDS data which may differ slightly from local sources, but offer consistent comparability across jurisdictions.

Permit activity in the County averaged about 2,600 per year from 2020 to 2024 with single family detached homes accounting for about 65% of units permitted. "Missing Middle" housing types such as duplexes and townhomes remain a very small proportion of total permits in all parts of the county. According to SOCDS data, Fort Collins permitted an average of 790 units per year (since 2020) 47% of which were single family detached. Loveland averaged 810 permitted units per year, with 49% of units detached, 3% in 2-4 unit structures, and 49% in multifamily structures. Future activity may be slower as permit activity dropped in 2024 (and local data indicates drops in 2025 as well), primarily due to higher interest rates which constrain development financing.

Figure III-2. Building Permits by Units in Structure, Larimer County, Loveland, and Fort Collins, 1980-2024



Note:

Note that SOCDS data may differ slightly from local permit reports but is used here for consistent comparison across communities

Source:

U.S. Census Building Permits Survey and Root Policy Research.

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SECTION III. HOUSING INVENTORY

HOUSING TYPE AND OCCUPANCY

This section summarizes the characteristics of Larimer County's housing stock, including housing type, age, and condition. It additionally provides an overview of the residents occupying housing in Larimer County by household characteristics.

Unit type. Households' housing needs and preferences change over time with fluctuations in household composition, income, employment, and age. A variety of housing types is ideal, regardless of the geographic area, to accommodate changing needs. Diversity in housing types is easier to achieve in faster growing, urban areas where density, volume building, and financial resources can be leveraged.

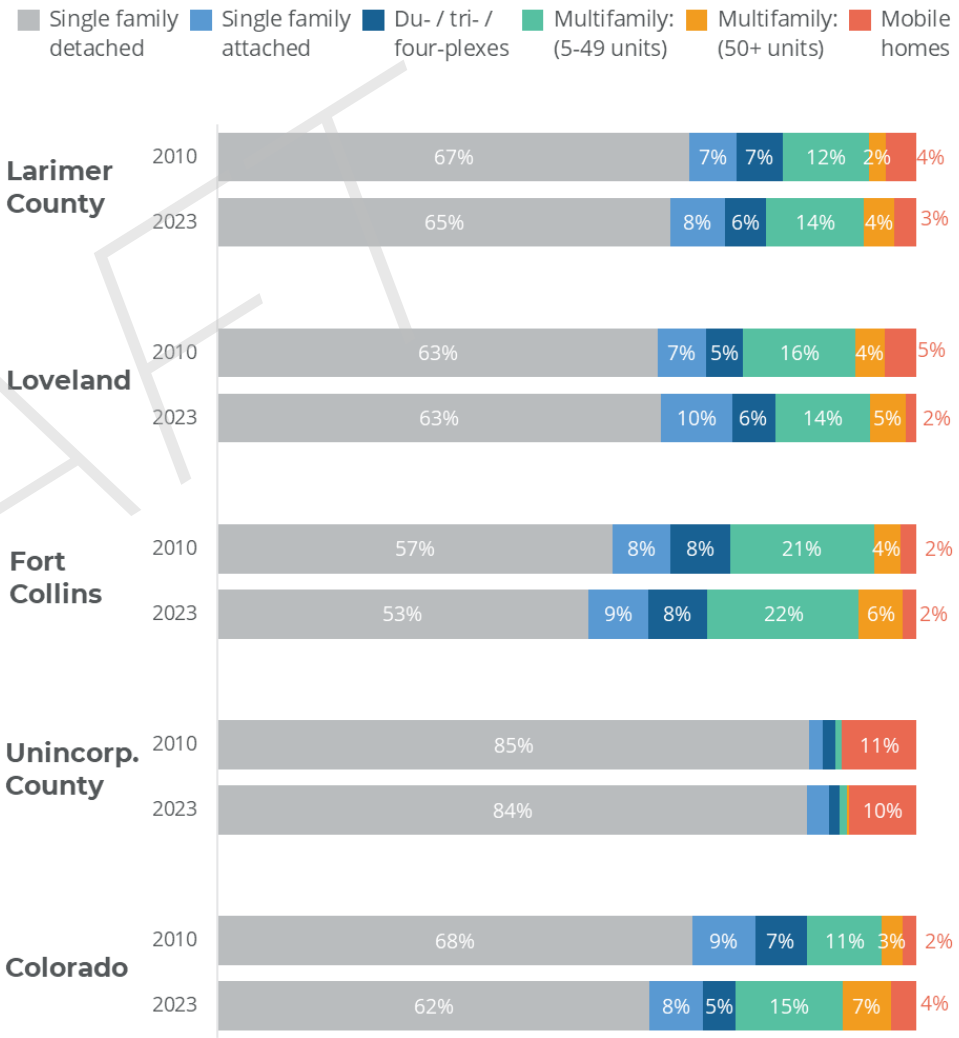
Despite an increase in multifamily permits (evident in the previous figure, III-2), single family detached homes remain the most common unit type in Larimer County, accounting for 65% of all units countywide and 84% of units in unincorporated areas (see Figure III-3).

Loveland has increased its share of homes that are small-structure attached (townhomes, duplexes, triplexes, quadplexes) since 2010 from 12% of units to 16% of units. These types of units tend to carry more affordability than single family detached but still offer ownership opportunities.

In Fort Collins, just over half of units are single family detached (53%), 28% are apartments or condos with 5 or more units, and 17% are small attached structures (e.g. townhomes, duplexes, triplexes, quadplexes).

Renters and owners tend to occupy different structure types with owners much more likely to live in single family detached units and renters more likely to live in attached housing products (see Figure III-4 on the following page).

Figure III-3. Units in Structure, 2010 and 2023



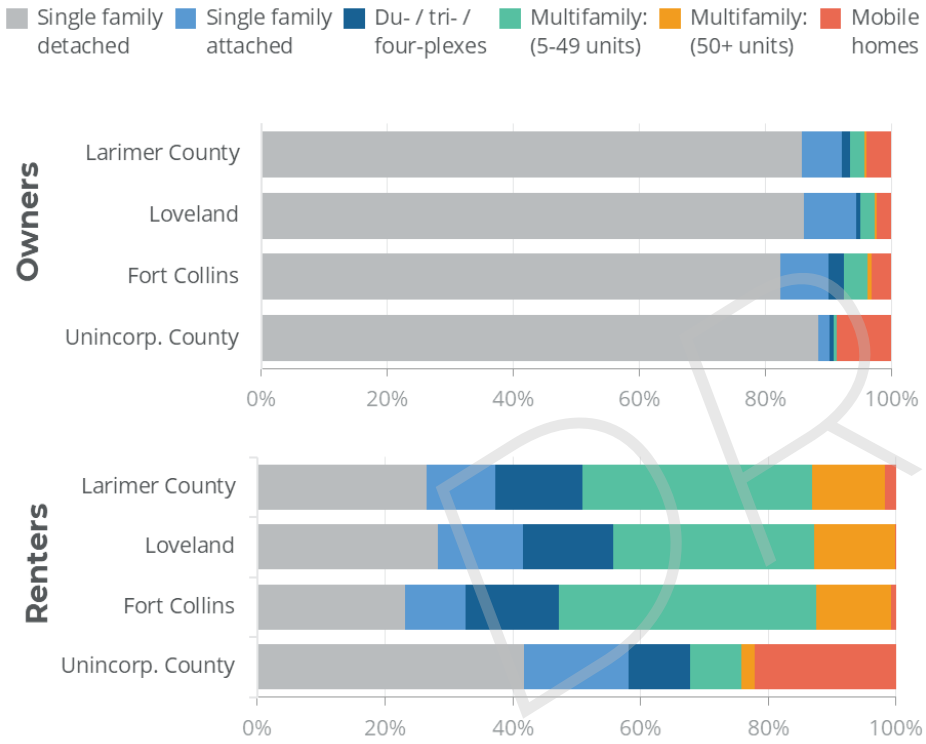
Source: 2010, 2018, and 2023 5-year ACS, and Root Policy Research.

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SECTION III. HOUSING INVENTORY

Renters living in unincorporated areas are less likely than renters in incorporated areas to live in traditional apartment buildings and large multifamily structures, due to the built environment of those areas. In Fort Collins and Loveland, close to three fourths of renters live in attached housing products.

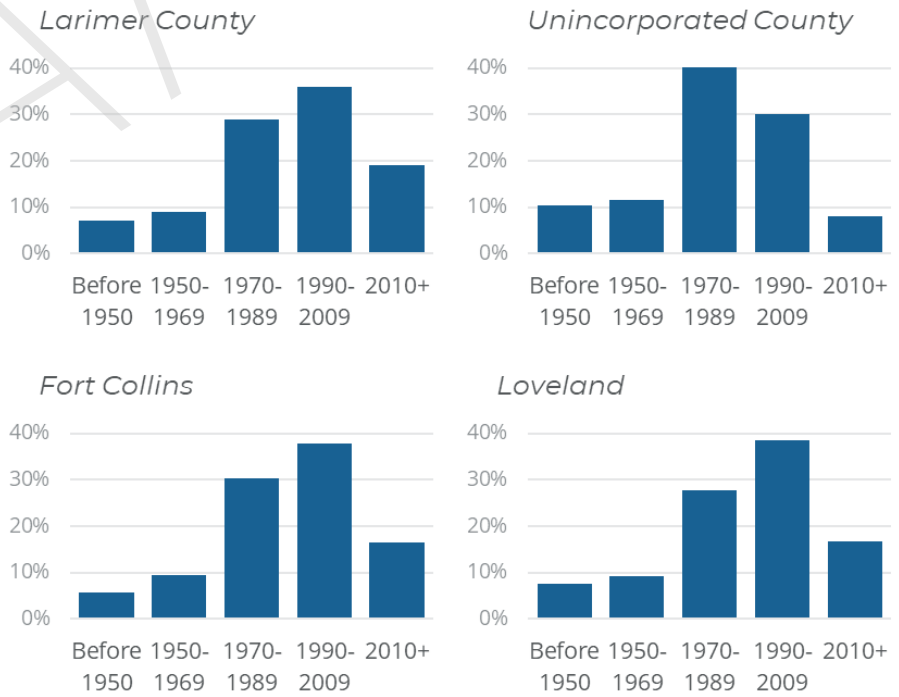
Figure III-4.
Units in Structure by Tenure, 2023



Source: 2023 5-year ACS, and Root Policy Research.

Age of housing stock. Larimer County homes were primarily built between 1970 and 2010. Unincorporated areas had the biggest construction boom during the 1970s and 80s, while urban areas of Fort Collins and Loveland have had more construction during the 1990s and 2000s. Very little housing stock countywide was built before 1950. While this means the overall stock isn't extremely old, the high proportion built in the 70s-90s is increasingly likely to need condition improvements. Homes built before 1980 also have a higher likelihood of lead exposure, which can lead to adverse health effects, as the use of lead in paint was not banned until 1978.

Figure III-5.
Distribution of Housing Stock by Year Built



Source: Colorado DOLA Department of Housing Mobile Home Registry.

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SECTION III. HOUSING INVENTORY

Housing condition. Units in poor condition are typically naturally affordable—and are oftentimes the only choice for low income households in very tight markets. Preserving and improving these units can be a critical part of housing strategies.

Data on the number of units in poor condition and needed improvements are difficult to obtain. ACS data estimate occupied housing units lacking complete kitchen facilities and units lacking plumbing facilities and can as such be used to identify units that are at-risk of demolition and loss. According to ACS data, 0.8% of occupied housing units in Larimer County lack complete kitchen facilities, while 0.3% of occupied units lack plumbing facilities. A single unit may be counted in each of these estimates if it lacks both plumbing and a complete kitchen.

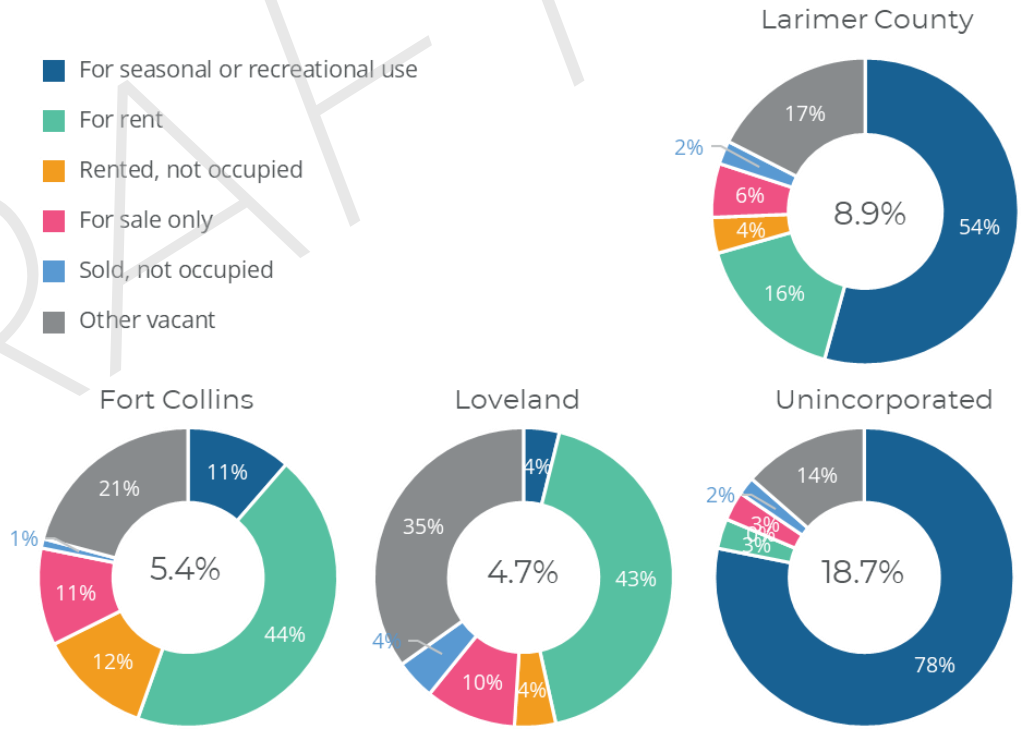
Vacancy. According to ACS data, 9% of county housing units are currently vacant. Vacancy rates are lower in Fort Collins (5.4%) and Loveland (4.7%), an indicator of very tight housing markets in these cities. Generally, housing economists consider vacancy rates between 5% and 10% to be stable market conditions—rates below that range signal constrained markets where prices are likely to increase more rapidly.

Figure III-6 shows the proportion of total housing units that are vacant (inside each doughnut chart) and the distribution of reasons for vacancy among those vacant units.

Vacancy rates in unincorporated areas are high (18.7%), but this largely reflects vacancies for seasonal, recreational, or occasional use.

In both Fort Collins and Loveland, the most common reason for vacancy is that units are for rent. This reflects a typical rate of churn on rentals as they transition to new occupants. Rental vacancy rates are discussed in more detail in a subsequent section on rental affordability and market trends (including 2025 vacancy data from Costar).

Figure III-6. Overall Vacancy Rates and Distribution of Reasons for Vacancy, 2023.



Source: 2023 5-yr ACS and Root Policy Research

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SECTION III. HOUSING INVENTORY

SPECIALTY SUBMARKETS

This section provides a deeper dive on unique housing types within Larimer County: manufactured/mobile homes; short-term rentals; and publicly assisted (income-restricted) housing.

Manufactured housing market. Manufactured homes (mobile homes)[2] are a form of naturally occurring affordable housing that allow lower income residents to become homeowners. Although this creates more housing opportunity for these households, manufactured homes that are located in "mobile home parks" or manufactured housing communities can also be an environment of uncertainty. In such cases, mobile home owners do not own the land underneath their home and pay a rent—around $1,100 per month[3]—for the lot. This subjects tenants to the volatility of the housing market that could make monthly payments unaffordable and is complicated by limitations on mobility—moving manufactured homes is often cost-prohibitive and in some cases illegal.

Increasing home and land values in Colorado also gives mobile home park owners a large incentive to sell, putting additional pressure on tenants who would need to relocate their homes. Many homeowners become displaced because they either cannot find somewhere to move their mobile home, or their home is too old to be relocated. Mobile home owners have increasingly limited options.

In response to concerns about rapidly increasing lot rents, mobile home owners across the country are increasingly interested in purchasing their mobile home parks as coops and/or in partnership with non-profits. Of the 45 registered mobile home parks in Larimer County; just one is not privately owned: Nueva Vida, a 68-home park in Fort Collins, is Larimer County's first (and currently only) non-profit owned community. The intent is to transfer ownership to residents in the future.[4]

Mobile home supply and cost. Assessor data identified 5,651 manufactured homes in Larimer County, a majority of which (91%) are located in mobile home parks. About 31% were built before 1976, which means they cannot be legally moved.

Figure III-7. Characteristics of Manufactured Homes

Source:

Larimer County Assessor, 2023 5-year ACS and Root Policy Research.

	Number	Percent
Number of Mobile Homes	**5,651**	**100%**
Location		
In mobile home parks	5,144	91%
On other parcels	507	9%
Year Built/Manufactured		
Before 1976	1,496	31%
1976 to 2000	3,025	44%
After 2000	1,130	25%
Median year built	*1988*	
Value and Cost		
Average value (excl. land)	$44,937	
Average gross rent, 2023	$1,051	

[2] Throughout this report the terms "mobile home" and manufactured home" are used interchangeably. Technically "mobile home" refers to homes built before 1976 and "manufactured housing" applies for units built after 1976. However, the terms are commonly used interchangeably, and we have followed that practice here.

[3] Lot rent data are scarce. This estimate is based on lot rent info disclosed in for sale listings in Larimer County. Based on listings from parks containing 54% of lots in the county, average lot rent is about $1,125 (but up to $1,350 in some communities).

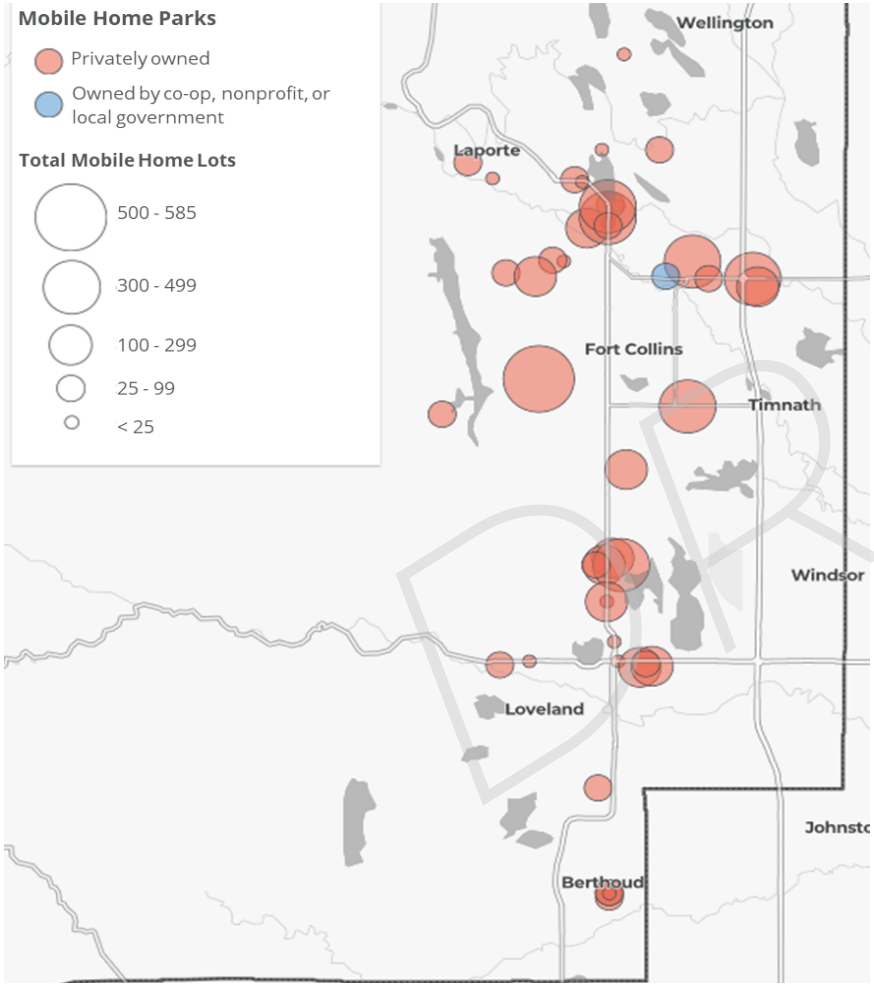
[4] https://mhpnetwork.org/nueva-vida-mobile-home-park/#:~:text=Nueva%20Vida%20Mobile%20Home%20Park%2C,with%20low%20levels%20of%20education.

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SECTION III. HOUSING INVENTORY

Mobile/manufactured home parks are clustered in the eastern portion of the county, in or adjacent to population centers (see Figure III-8). However, manufactured homes outside of parks are more common in mountain and rural areas of the county.

Figure III-8. Mobile Home Parks, Larimer County, 2025



Note: All registered mobile home parks in Larimer County are visible in the figure.

Source: Colorado DOLA Department of Housing Mobile Home Registry.

Population profile. Compared to other households in the county, mobile/manufactured home residents are substantially more likely to identify as Hispanic (30% of manufactured home residents compared to 9% of households overall and just 7% of stick-built single family home residents). They are also older (higher proportion over 65) and more likely to be single person households (35%). Figure III-9 compares characteristics of manufactured housing residents to those living in single family homes and Larimer County households overall.

Figure III-9. Characteristics of Manuf. Home Occupants

	All Households	Single Family Homes	Manufactured Homes
Tenure			
Owners	64%	82%	81%
Renters	36%	18%	19%
Age of Householder			
15 to 34	27%	17%	17%
35 to 64	48%	55%	52%
65 and over	25%	28%	31%
Race/Ethnicity			
Non-Hispanic White	85%	88%	66%
Hispanic	9%	7%	30%
Other racial minority	6%	5%	3%
Household Type			
Family household	60%	71%	59%
Non-family household	40%	29%	41%
Household Size			
1-person household	26%	19%	35%
2- or 3-person household	56%	59%	41%
4-or-more person household	19%	22%	24%

Source: Larimer County Assessor, 2023 5-year ACS and Root Policy Research.

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SECTION III. HOUSING INVENTORY

Short term rental market. This section provides a high-level overview of short-term rentals, typically defined as residential units rented less than 30 days at a time. Short-term rentals, or STRs, play a unique role within housing markets because they can provide economic benefits (to homeowners through rental revenue and local governments through sales tax/tourism revenue) but may disrupt the long-term rental market if they account for a substantial portion of the total housing stock (this is most common in tourist-driven economies such as mountain resort communities in Colorado). Figure III-10 summarizes Larimer County STRs by market area (defined by ZIP code) using data from airdna.com.

There are 2,883 homes listed as STRs in Larimer County ZIP codes[5] accounting for just 1.3% of the total housing stock in those ZIP codes.[6] STRs make up a much greater share of units (20%) in Estes Park ZIP codes. This compares to 44% of the housing stock in some of Colorado's other mountain resort counties—Eagle, Grand, Pitkin, Routt, and Summit.[7]

Approximately 35% of Larimer County STRs are part-time STRs, meaning they are available fewer than 180 nights per year. Some of these may be permanently occupied and rented occasionally, others may be rented consistently and otherwise vacant or used seasonally.

Figure III-10. Active Short Term Rentals by Market Area, Larimer County ZIP Codes, 2026

STR Market Area *(ZIP Codes)*	All Active STRs	Whole Home STRs	STRs as a % of Total Housing Units	Annual Availability (1-90 nights / 91-180 nights / 181-270 nights / 271-365 nights)
Longmont (80503, 80504)	272	215	0.7%	27% / 18% / 20% / 35%
Bellvue (80512, 80535)	45	45	1.9%	19% / 54% / 21% / 6%
Berthoud (80513)	29	23	0.4%	34% / 24% / 24% / 18%
Estes Park (80515, 80517)	1,473	1,414	20.0%	12% / 16% / 18% / 53%
Fort Collins (80521, 80524, 80525, 80526, 80528, 80547)	560	487	0.6%	19% / 18% / 17% / 45%
Johnstown (80534)	33	26	0.4%	35% / 20% / 15% / 31%
Red Feather Lakes (80536, 80545)	39	38	1.2%	21% / 19% / 18% / 42%
Loveland (80537, 80538)	275	239	0.7%	21% / 14% / 16% / 49%
Allenspark (80540)	59	50	2.3%	20% / 36% / 25% / 19%
Laporte (80549)	15	13	0.3%	19% / 15% / 26% / 41%
Windsor (80550)	83	69	0.5%	32% / 17% / 20% / 30%
Larimer County ZIP codes	**2,883**	**2,619**	**1.3%**	17% / 18% / 18% / 47%

Note:

AirDNA defines an "active" listing as one that has advertised on AirBNB and/or VRBO in the past 12 months (listings are de-duplicated across platforms).

Source:

AirDNA and Root Policy Research.

[5] AirDNA data are only available by ZIP codes, which does not perfectly align with jurisdictional boundaries.

[6] There is no commonly accepted threshold for when STRs disrupt a housing market; however, Root's experience in working with communities on STR regulations suggests that when STRS are less than 10% of a city's housing stock, market impacts are negligible. As such, we typically recommend jurisdictions track (or license) STRs to evaluate their presence in the market, paying relatively close attention to STRs once they constitute at least 5% of the total stock and consider additional policies/interventions at 10% of total stock.

[7] https://news.airbnb.com/wp-content/uploads/sites/4/2022/06/STR-Colorado-Impact-Study_Final_05.25.2022.pdf

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SECTION III. HOUSING INVENTORY

Affordable (publicly assisted) inventory. As the rental market has become more competitive, low income renters find it increasingly challenging to find affordable market rate units. Limited naturally occurring affordable housing contributes to the need for publicly assisted rental housing—housing that receives some type of public subsidy in exchange for occupant income restrictions.

The National Housing Preservation Database (NHPD) tracks federally assisted, designated affordable rental housing units. According to NHPD data and as shown in Figure III-11, there were 4,765 designated affordable rental housing units in Larimer County in 2025—accounting for about 3% of total housing stock or 9% of rental stock. Proportions are similar in Fort Collins (4% and 9%) and Loveland (4% and 11%).

As shown below, Low Income Housing Tax Credits (LIHTC) fund 88% of designated affordable rental units in the county (including LIHTC alone and LIHTC paired with a HUD subsidy).

There are also about 3,700 Housing Choice Vouchers (HCVs) in use in Larimer County, with which income-qualified recipients (earning 50% AMI or less) can find market-rate units that meet their needs. It should be noted that vouchers and units are not necessarily additive as vouchers can be used in subsidized units, creating overlapping subsidies to support extremely low income families.

In addition to the affordable rental stock, about 540 designated affordable owner-occupied homes have been created in the county through active non-profits and for-profit builders.

Figure III-11.
Federally Assisted Affordable Rental Units by Funding Source, Larimer County and Jurisdictions, 2025

	Larimer County	Fort Collins	Loveland	Estes Park	Berthoud
Affordable developments	69	42	19	6	2
Total Affordable Units	**4,765**	**3,086**	**1,424**	**208**	**47**
HUD program only	559	273	216	23	47
LIHTC only	1,531	913	562	56	0
LIHTC & HUD	2,675	1,900	646	129	0
Housing Choice Vouchers	**3,728**	**2,556**	**894**	**28**	**15**

Source: National Housing Preservation Database and Root Policy Research.

Cumulatively, 30% of federally assisted, designated affordable units (1,306 affordable units) in the county will see their affordability subsidies expire in the next 10 years. When subsidies expire, the owners of those properties are able to remove income and rent restrictions, making those building at risk of becoming market-rate (depending on ownership structure and preservation opportunities).

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SECTION IV. HOUSING MARKET TRENDS

This section assesses how market factors like rents, home prices, and inventory impact housing affordability. It begins with an overview of rental market dynamics followed by an analysis of home sales and owner-occupied home values. The section concludes with a discussion of market affordability—evaluating the rent/price trends in the context of incomes and wages.

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SECTION IV. MARKET TRENDS

RENTAL MARKET

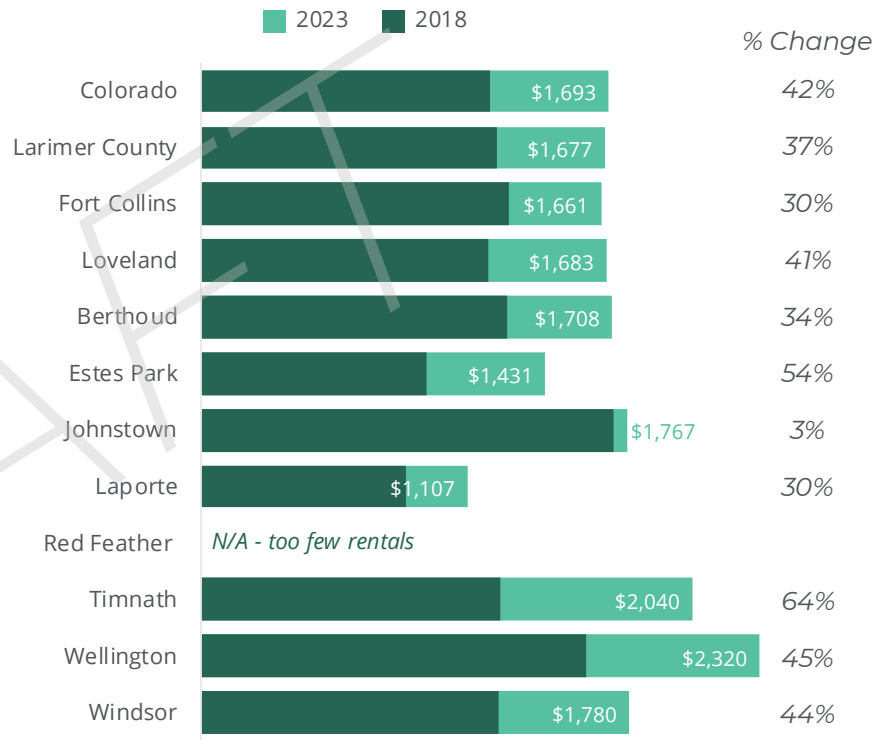
Between 2018 and 2023, median rent in Larimer County increased 37% (from $1,228 to $1,677, according to ACS data) as existing rental units shifted into higher price points and new products were delivered near the top of the market. From 2023 to 2025, rents were relatively flat, with current rent at $1,640 according to Costar data. Trends were similar in Loveland and Fort Collins though the rate of increase was higher than in Loveland (41% rise 2018-2023) than in Fort Collins (30% increase).

Figure IV-1, at right, shows changes in rent by community from 2018-2023 using ACS data, which reflect all rental units regardless of type—single family homes and multifamily apartments. (Costar data on multifamily rents through 2025 is discussed later in the section).

Rent increases are occurring across market segments, resulting in a significant loss of naturally affordable rental stock. Figure IV-2 (on the following page) shows changes in the distribution of rents by jurisdiction since 2010. The distribution includes income-restricted units and reflects the reduced rents of housing choice voucher holders.

- In Larimer County overall, 65% of rentals were priced below $1,000 per month in 2010. This dropped to 32% in 2018, then to just 13% in 2023. The proportion of rentals priced below $1,500 was cut in half between 2018 and 2023 (from 70% down to 38%).
- Similarly, shifts in the distribution of rent in unincorporated areas accelerated in the early 2010s, and by 2023, only 17% of rentals were still priced below $1,000 (compared to 48% in 2018).
- The rental distribution in Fort Collins shows similar upward trends. In 2010, 64% of rentals went for less than $1,000 per month. By 2018, there were half as many units in that price range (28%); and the proportion was cut in half again by 2023 (13%). Collectively only 39% of rentals are priced below $1,500 in 2023.
- In Loveland, despite notable increases in the total rental stock, naturally occurring affordable rentals declined substantively. As of 2023, just over one-third of rentals (37%) are less than $1,500 per month, compared to 72% in 2018 and 83% in 2010.

Figure IV-1.
Median Rent, Larimer County Communities, 2018 and 2023

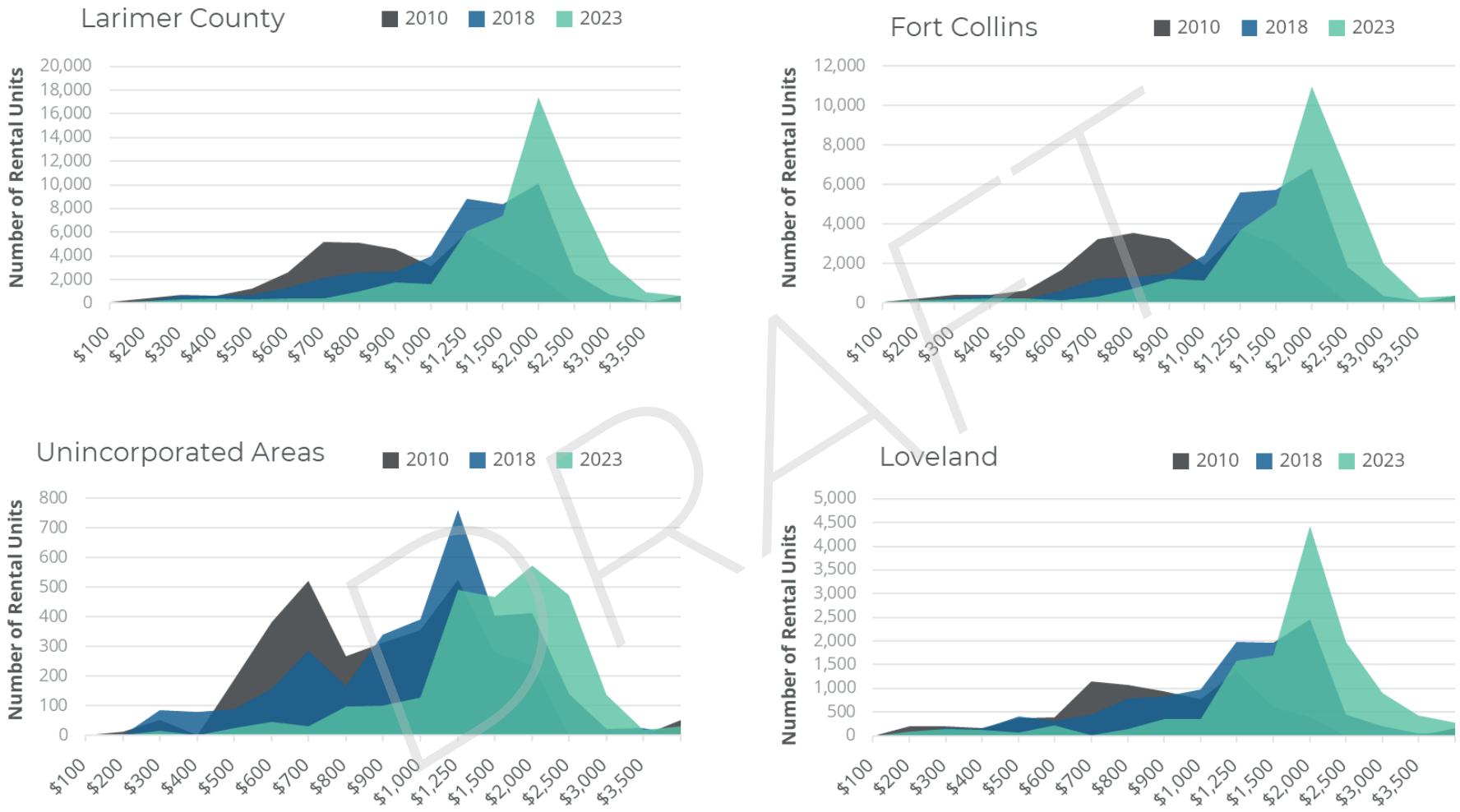


Source: 2018 and 2023 ACS and Root Policy Research.

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Figure IV-2.
Rent Distribution, Larimer County, Unincorporated Areas, Loveland, and Fort Collins, 2010 - 2023



Source: 2010, 2018 and 2023 ACS and Root Policy Research.

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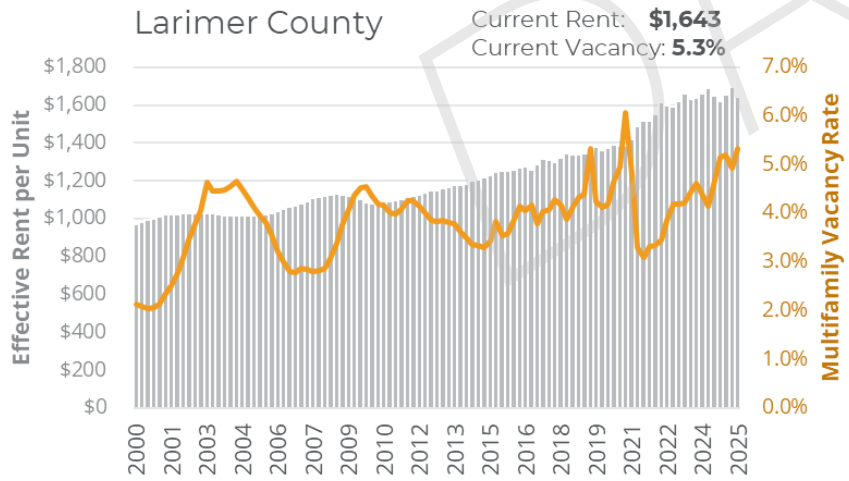
SECTION IV. MARKET TRENDS

The preceding rental data is based on ACS estimates and includes all rental units, regardless of unit type (single family and multifamily rentals). While ACS data are ideal for an overview of the full rental market; CoStar data, which focus exclusively on multifamily apartments, provide more recent data (through Q3 2025).

Figure IV-3 shows the CoStar effective rent for multifamily units in Larimer County, Loveland, and Fort Collins along with the rental vacancy rate for those units.

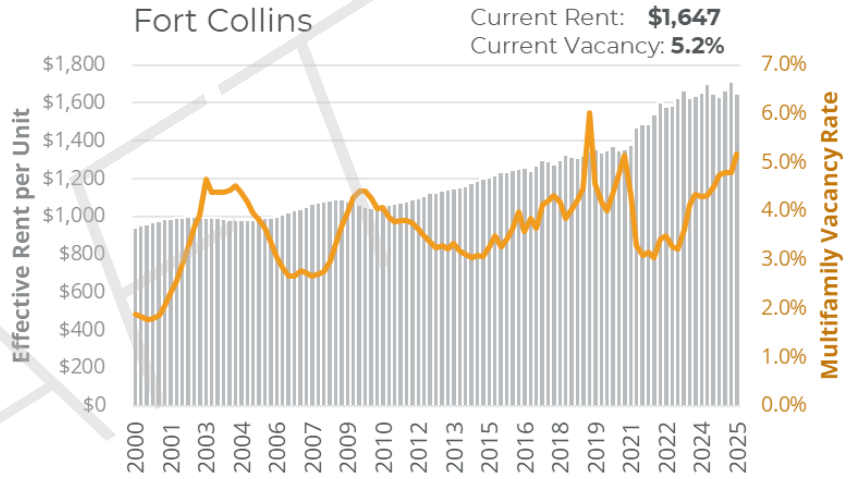
Rent growth plateaued over the past 2 years with relatively little change in median rents between 2023 and 2025. Market dynamics tied to this recent softening of rents go back to the multifamily production slowdown during COVID: multifamily production slowed and vacancy rates dropped, driving sharp increases in rents between 2020 and 2023. As the market stabilized, vacancy rates started to rise and rents moderated.

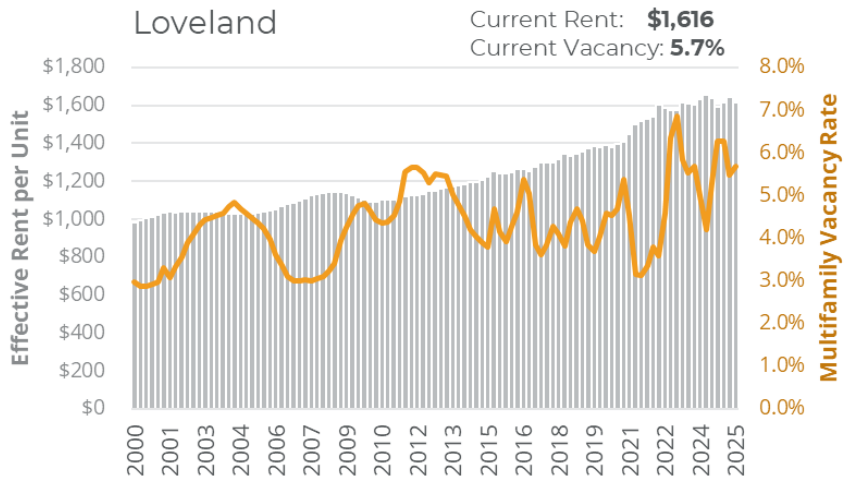
Figure IV-3. Multifamily Rent and Vacancy Trends, 2000-25



Even so, current rental vacancy rates are still below 6% (rates below 10% signal a tight rental market). Forecast models suggest that rents will start rising again in 2026 but only expect a 5%-7% increase in median rents over the next 5 years (to around $1,730 in 2030).

Figure IV-3 (continued)...





Source: Costar and Root Policy Research.

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SECTION IV. MARKET TRENDS

FOR-SALE MARKET

Typical home prices in Larimer County are about 10%-15% higher than the state average. Prices have moderated in the last couple of years following a decade of steep increases. Despite price moderation, purchase affordability remains a challenge due to relatively high interest rates and lagging income gains.

Figure IV-4 shows trends in the typical home price for Larimer County Communities from 2006 to 2025 based on Assessor sales data along with a comparison for income change over the same period. (Data for the sate reflect Zillow research data rather than Assessor data).

- Timnath and Estes Park have consistently higher home prices than Larimer County overall.
- Fort Collins prices are very similar to the county, while Loveland prices hover just below both Fort Collins and the county.
- Wellington and Red Feather have home prices below the county average but show similar rates of increase over the past decade.
- Median income growth has failed to keep pace with home value growth. Between 2018 and 2023, the typical home price rose 46% while the median income increased 24%.

Additional discussion of changes in affordability—prices relative to incomes—is discussed in the subsequent portion of this section (starting on page IV-6).

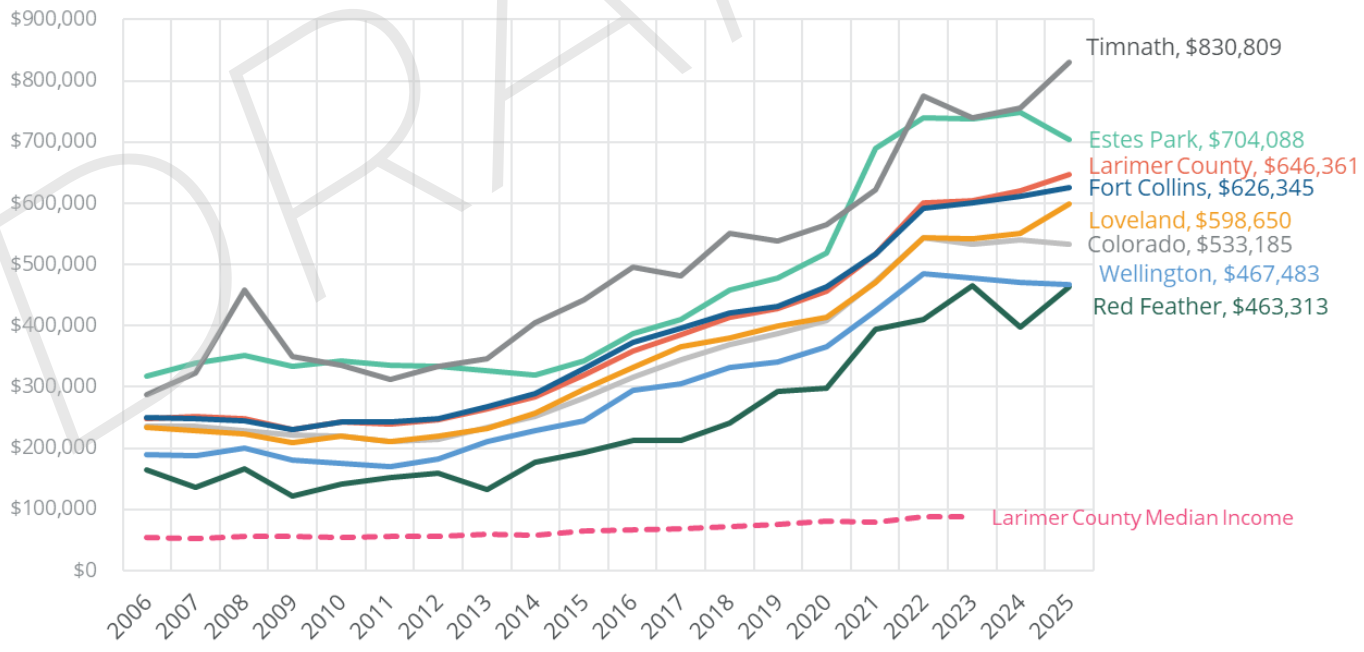
Figure IV-4. Typical Home Price Trends 2006–2025

Note:

Colorado data from Zillow Research, all Larimer County Communities from Assessor data; includes detached and attached homes. Income data only available through 2023.

Source:

Zillow Research, Larimer County Assessor, BLS, and Root Policy Research.



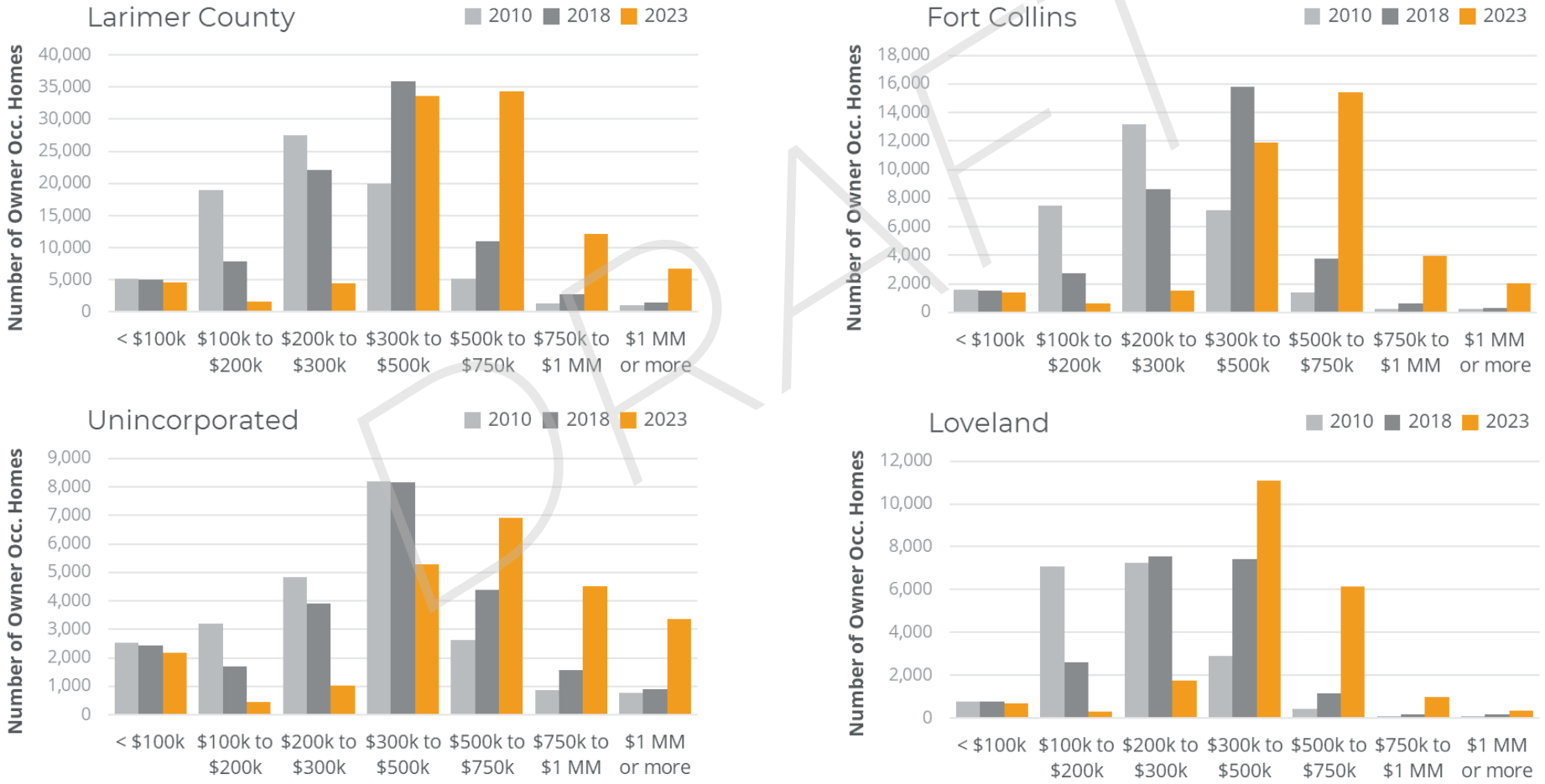
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SECTION IV. MARKET TRENDS

Home values. Figure IV-5 shows changes in the distribution of owner-occupied home values since 2010. Values reflect self-reported values of all owner-occupied housing stock, as reported in the ACS.

In 2010, two-thirds of owner-occupied homes in Larimer County were valued below $300,000. That share decreased to 41% in 2018 and then to just 11% by 2023. Across each jurisdiction evaluated, there were substantial increases in the proportion of homes priced over $500,000 offset by a significant decline in inventory priced below $300,000. This shift pushes first-time ownership out of reach for many potential buyers but also impacts existing owners through rising property taxes (based on higher valuations).

Figure IV-5. Home Value Distribution, 2010, 2018, and 2023.



Source: 2010, 2018, and 2023 5-year ACS and Root Policy Research

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SECTION IV. MARKET TRENDS

Home sales. While the previous figure focuses on self-reported home values of all owner-occupied homes, the subsequent analysis focuses only on homes that were sold and their final sale prices (using assessor data). The sales analysis illustrates the types and prices of homes that may be *available* to buyers in a given year.

Over a nearly two-year period between January 2024 and October 2025, about 9,000 homes were sold in Larimer County for an average sale price of $630,000. Twenty-seven percent of those were attached homes (townhomes, condos, duplexes). As shown in Figure IV-6, sales inventory peaked in 2021and dropped through 2023. 2024 inventory is similar to the late 2010s.

Figure IV-6.
Number of Sales by Year

Source:
Larimer County Assessor and Root Policy Research.

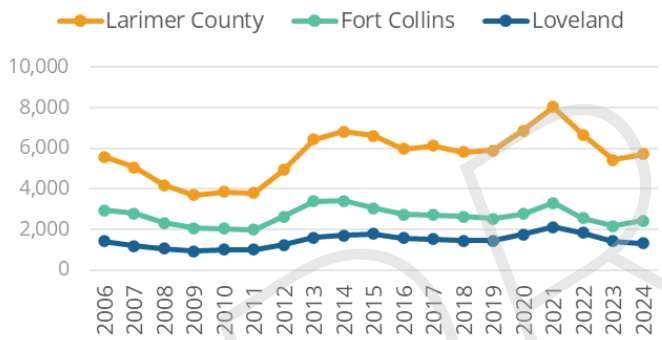
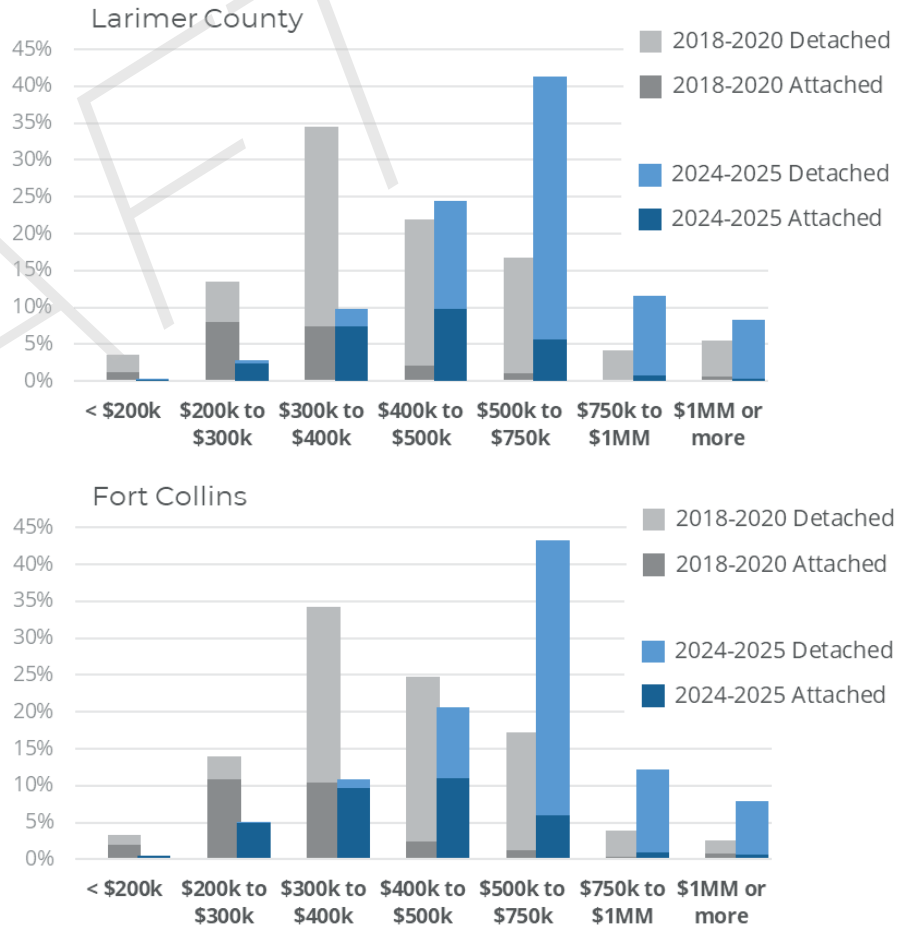


Figure IV-7 displays the distribution of sale prices in Larimer County comparing sales between Jan. 2018 and July 2020 (the same period analyzed in the previous Larimer County HNA) to sales between Jan 2024 and October 2025.[1] As illustrated the current market is primarily providing homes priced between $500,000 and $750,000, leaving a very limited supply of entry-level homes.

Between 2020 and 2025, the biggest price shift is a loss of homes priced between $200,000 and $400,000 (and an increase in homes priced $500,000 or more). Similar trends were evident in Fort Collins and Loveland though Loveland also had an increase in homes price between $400,000 and $500,000.

Figure IV-7.
Home Sales by Price and Type, 2018- 20 and 2024-25

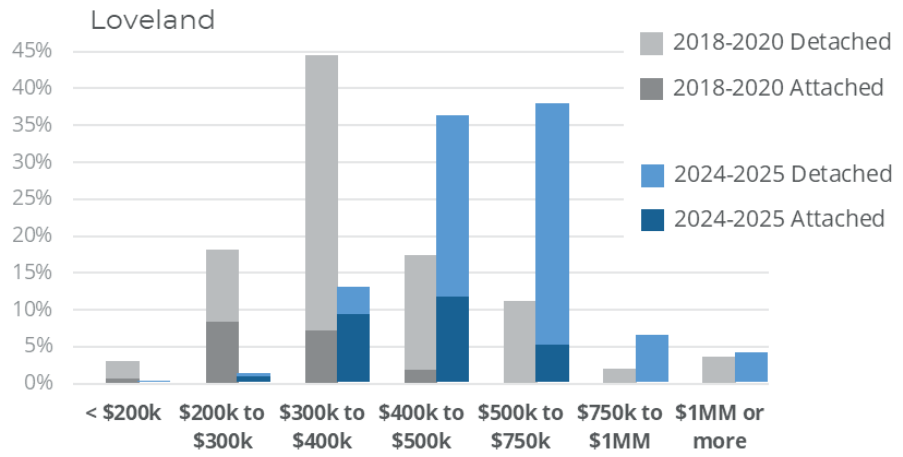


[1] Using multi-year sales periods offers a sufficient number of sales to conduct more detailed analysis by type and price-point.

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SECTION IV. MARKET TRENDS

Figure IV-7 (Continued)...



Note: Excludes mobile home sales. Location determined by postal address not jurisdictional boundaries.

Source: Larimer County Assessor and Root Policy Research.

Figure IV-8 shows average characteristics of both attached and detached homes sold in Larimer County, Fort Collins, and Loveland between Jan. 2024 and Oct. 2025. On average, attached units are smaller—but newer---and have a lower price than detached homes:

- Countywide, attached units constituted 27% of total sales (up from 20% in 2018-2020). The average price of an attached home is about $250,000 less than a detached home (for about 600 fewer sq. ft.).
- In Fort Collins, the price difference between attached and detached sales is about $275,000 (on average), with a 626 square foot differential. Attached sales were 32% of total sales in 2024/25.
- Loveland has the newest attached stock on average, but also a lower differential on sale prices: the average attached sale is about $175,000 lower than the average detached. In 2024/25, 27% of sales were attached housing products.

Figure IV-8.
Characteristics of Homes Sold, 2024-2025

	Attached Homes	Detached Homes	All Sales
Larimer County			
Num. of Sales	2,401	6,528	8,929
Sale Price	$452,971	$693,603	$629,686
Price per SF	$340	$362	$359
Square Footage	1,332	1,916	1,753
Bedrooms	2.50	3.50	3.23
Bathrooms	2.39	2.86	2.73
Year Built	2004	1997	1999
Fort Collins			
Num. of Sales	1,254	2,627	3,881
Sale Price	$430,878	$706,706	$617,545
Price per SF	$335	$369	$361
Square Footage	1,288	1,914	1,712
Bedrooms	2.44	3.60	3.23
Bathrooms	2.37	2.92	2.74
Year Built	1999	1991	1993
Loveland			
Num. of Sales	551	1,487	2,038
Sale Price	$433,970	$611,274	$567,544
Price per SF	$334	$354	$356
Square Footage	1,300	1,725	1,599
Bedrooms	2.50	3.43	3.18
Bathrooms	2.29	2.64	2.55
Year Built	2008	1990	1994

Note: Excludes mobile home sales. "Attached" includes condos, duplexes, triplexes, and townhomes. Location determined by postal address not jurisdictional boundaries.

Source: Larimer County Assessor and Root Policy Research.

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SECTION IV. MARKET TRENDS

CHANGES IN MARKET AFFORDABILITY

This section places rent and home price trends in the context of income trends and affordability for households and workers.

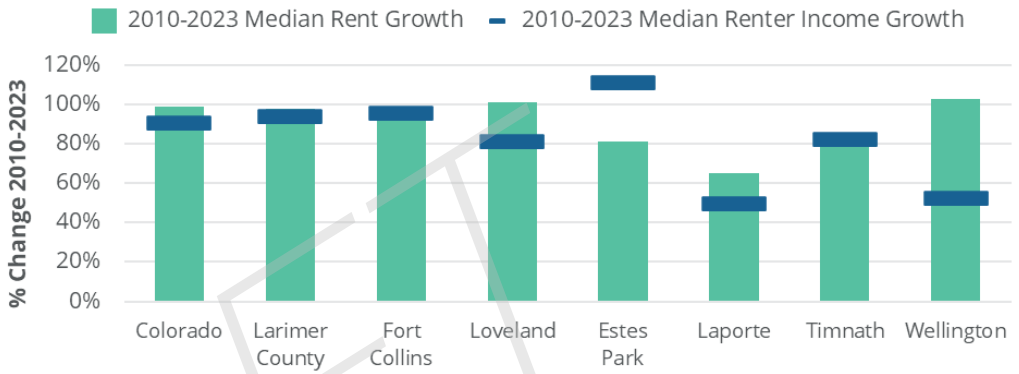
Rental affordability. Where increases in rental costs outpace increases in renter incomes, renting becomes less affordable. Figure IV-9 compares growth in median rent to growth in median renter incomes between 2010 and 2023 for Larimer County and its communities.

Countywide, renter incomes at the median were almost on pace with rising rental costs (incomes rose 94%; rents rose 98%). However, renters in Loveland, Laporte, and Wellington did not see parity in income and rent gains—and the market became less affordable to the typical renter.

It is also important to acknowledge that changes in median income do not always indicate rising incomes for all renters—a rising median income can also be a sign that high income renters are not entering homeownership (and thus staying in the renter pool), and/or that low income renters are leaving the area. A more comprehensive look at affordability needs across the income spectrum is included in Section IX: Current and Projected Housing Needs.

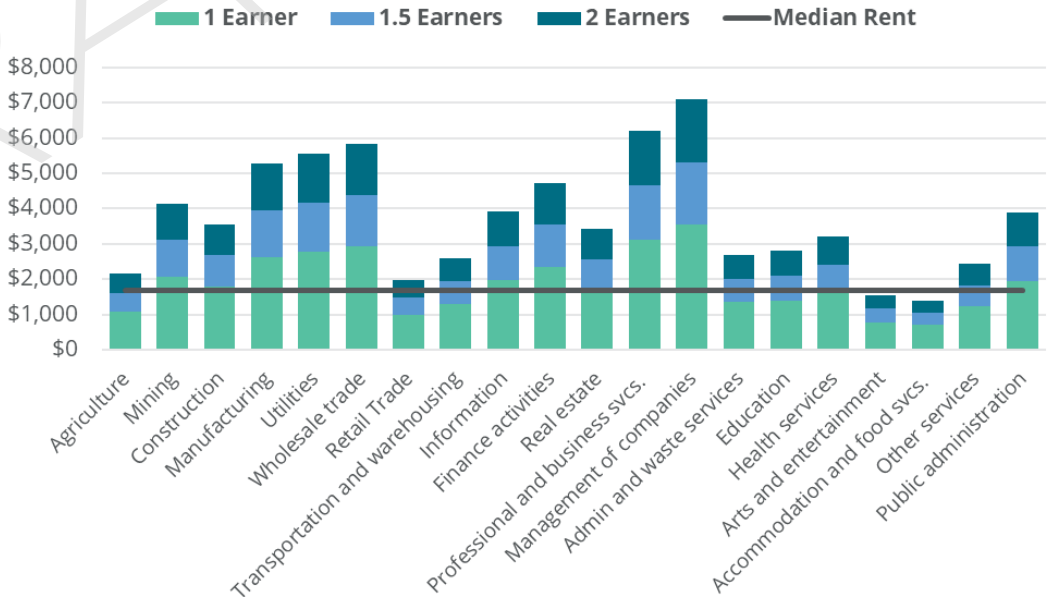
Figure IV-10 demonstrates rental affordability for Larimer County's workforce by comparing median rent with rental affordability thresholds for average annual wage earners in each industry. Only about half of all industries (11 of 20) have average wages sufficient to afford median rent with just one earner per household.

Figure IV-9. Rent vs. Renter Income Growth, 2010 to 2023



Source: 2010 and 2023 5-year and 5-year ACS estimates and Root Policy Research

Figure IV-10. Rental Affordability by Employment Industry and Number of Earners, Larimer County, 2023



Note: Affordability estimates assume households spend no more than 30% of income on housing.

Source: QCEW, 2023 5-yr ACS, and Root Policy Research.

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SECTION IV. MARKET TRENDS

Purchase affordability. In the home purchase market, income growth (and purchase affordability) has not kept pace with the rapid rise in home prices in Larimer County. This trend was exacerbated by higher mortgage interest rates in recent years, which lowers purchasing power.

Figure IV-11 tracks the affordable home price[2] for households earning 80%, 100%, and 120% of AMI alongside typical home prices in the county. Affordable home price accounts for both income changes and changes in mortgage interest rates.

- In 2006, the gap between what a 100% AMI household could afford and the typical sale price was $79,000 in Larimer County.
- Between 2009 and 2013, rising incomes coupled with a dip in prices made the market relatively affordable for 100% AMI households (purchase affordability was within $20,000 of the average sale price during that time—and affordability exceeded price in 2012).
- The gap widened again through 2019 followed by a brief period of historically low interest rates in 2020 and 2021 that created a temporary bump in purchasing power.
- Since 2022, prices have continued to rise despite higher interest rates that have compressed affordability. Since that time, the gap between what a 100% AMI household can afford and the typical sale price has remained over $300,000 in Larimer County.

Figure IV-11.
Typical Sale Price vs. Affordable Home Price for Households Earning 80%, 100%, and 120% AMI, 2006-2025

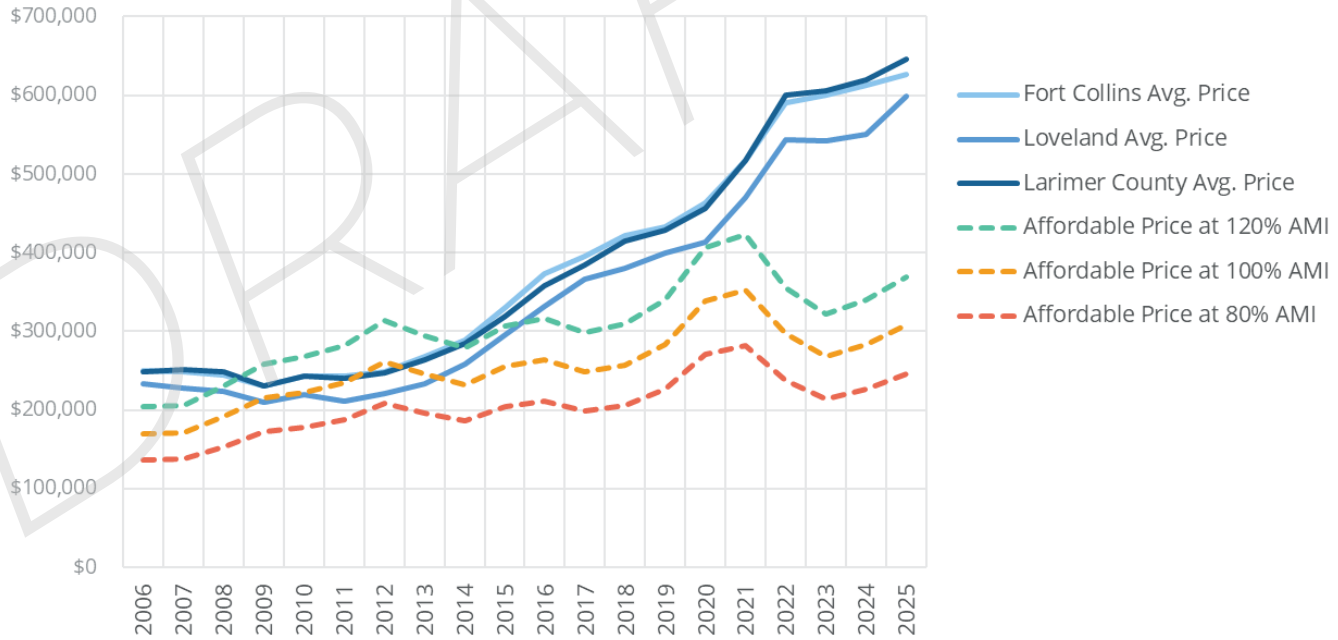
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Note:

Assumes a 30-year mortgage at the annual average mortgage rate with a 10% down payment, 30% of monthly payment is used for property taxes, utilities, and insurance.

Source:

HUD AMI, Larimer County Assessor, BLS, Freddie Mac annual average fixed mortgage rates, and Root Policy Research.



[2] Calculations are at 30% of income going to housing costs and assume a 30-year mortgage at the annual average mortgage rate with a 10% down payment, 30% of monthly payment is used for property taxes, utilities, and insurance.

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SECTION IV. MARKET TRENDS

Figure IV-12 shows home purchase affordability for Larimer County's workforce by comparing the county's average home sales price in 2023 ($605,183) with home price affordability thresholds for individuals earning the average annual wages of industries (2023 wages).

- Purchasing a median priced home is unaffordable to single-earner households in every industry in Larimer County.
- Management of Companies is the only industry with average wages high enough to afford a home with 1.5 earners—but this industry accounts for less than 1% of total employment.
- Average 2-earner households in 4 industries (Manufacturing, Utilities, Wholesale, and Professional Services)—can afford to purchase a median-priced home. These industries collectively account for 20% of jobs in the County.

Figure IV-12.
Home Purchase Affordability by Employment Industry and Number of Earners, Larimer County 2023

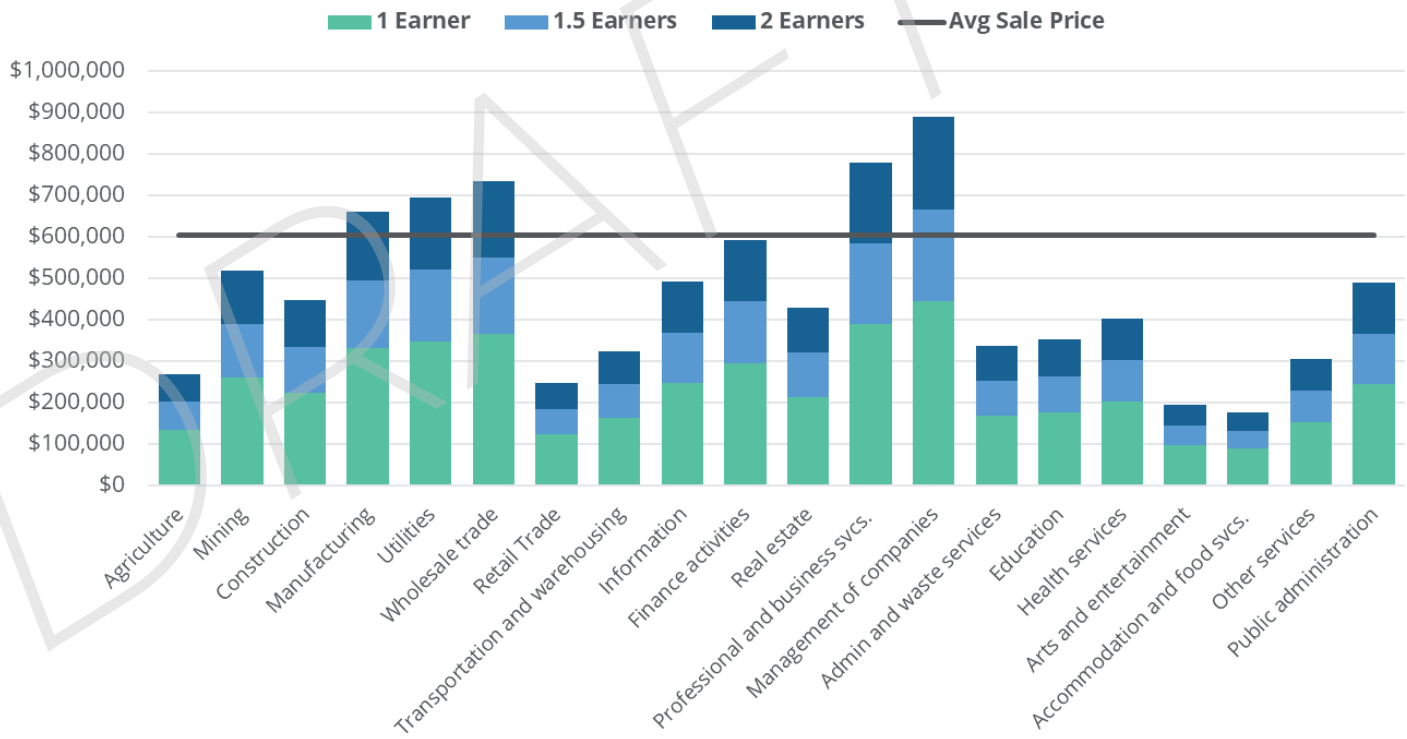
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Note:

Affordability estimates assume households spend no more than 30% of their income on housing. Maximum affordable price estimates assume a 30-year mortgage with 10% down, a 6.50% interest rate, and 30% of monthly payment to property taxes, utilities, and insurance.

Source:

QCEW, 2023 5-yr ACS, and Root Policy Research.



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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

This section provides data on cost burden, overcrowding, homelessness, and housing instability, including displacement risk indicators. Understanding a region's housing problems – cost burden, overcrowding, housing instability, and homelessness – informs optimal funding of housing programs that improve outcomes for residents, particularly those with low- to moderate-income or other vulnerabilities.

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

COST BURDEN

The federal government, and most housing programs, consider housing as affordable when the housing payment—the rent or mortgage payment, plus taxes and utilities—consumes 30% or less of a household's gross income. Households who pay more than 30% are "cost burdened." This standard is derived from historically typical mortgage lending requirements and is also applied to renters.

Households experiencing cost burden have less money to spend on other essentials like healthcare, education, groceries, and transportation—adversely affecting their household well-being, limiting their economic growth potential, and constraining local spending.

When households pay more than 50% of their incomes for housing costs they are considered "severely cost burdened." These households are typically most at risk of displacement and struggle to manage housing and other household costs.

Federal definition of affordability

1) Housing costs are "affordable" if they do not exceed 30% of household's gross monthly income
2) "Costs" include basic utilities, mortgage insurance, HOA fees, and property taxes



Households paying more than 30% for housing are "cost burdened"

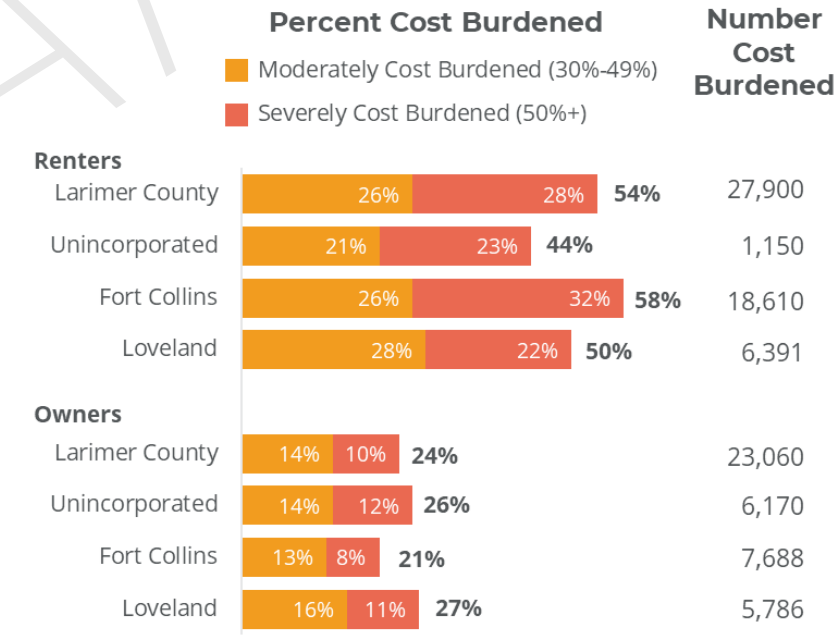


Households paying more than 50% for housing are "severely cost burdened"

Cost burden by tenure. Just over half (54%) of Larimer County's renter households (27,900 households) are cost burdened, spending 30% or more of their income on housing costs. Twenty-eight percent are severely cost burdened, putting them at risk of homelessness. A similar number of owner households are cost burdened—23,060 households, though this represents a lower proportion of owner households (24%).

Fort Collins houses a disproportionate share of cost burdened renters in the county (18,610 households) but cost-burdened owners are spread more evenly across Fort Collins, Loveland, and unincorporated areas.

Figure V-1. Cost Burden by Tenure and Jurisdiction, 2023



Source: 2023 5-year ACS, and Root Policy Research.

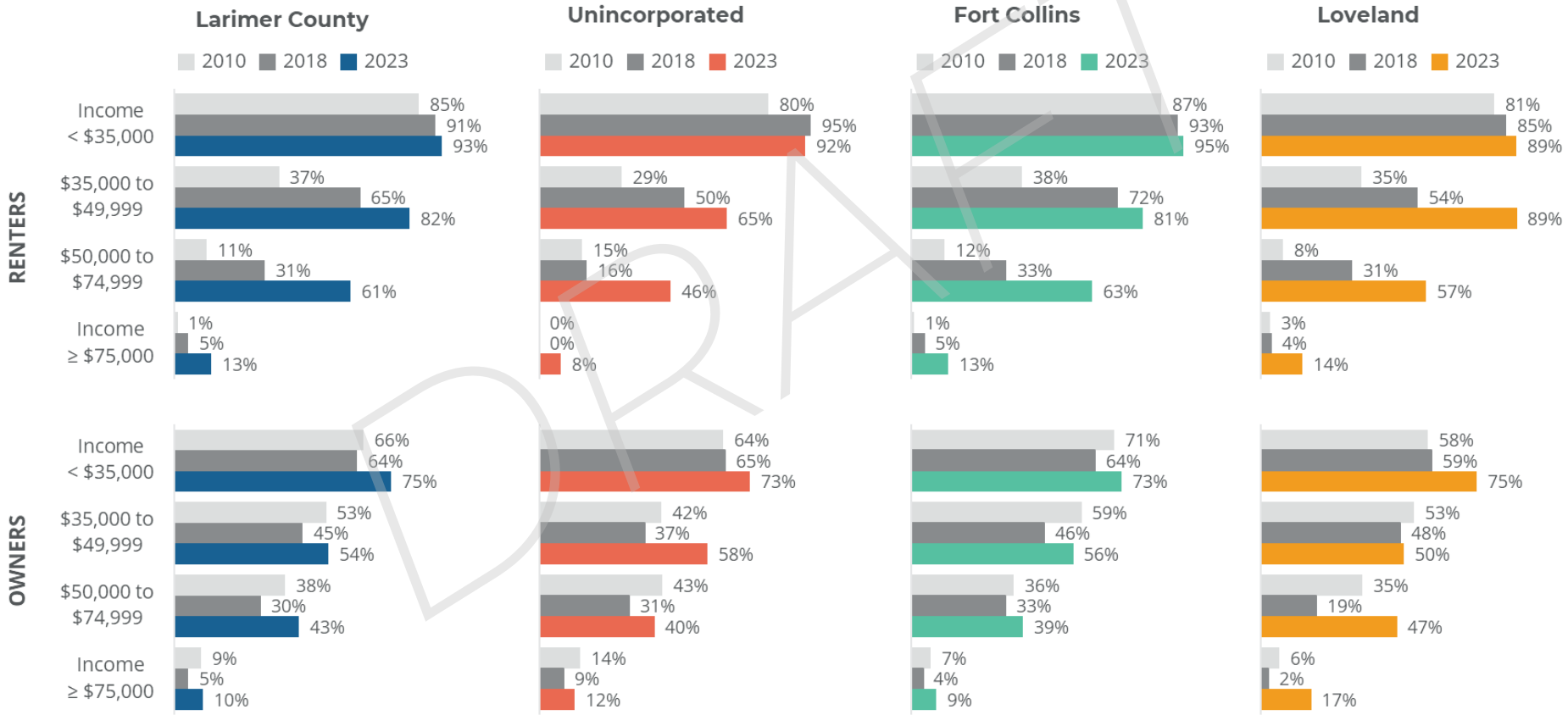
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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

Cost burden by income. Figure V-2 presents shifts in cost burden by income for owner and renter households in Larimer County, its unincorporated areas, Fort Collins, and Loveland from 2010 to 2023. Cost burden increased for owner and renter households in nearly every income bracket since 2010.

The most dramatic increases occurred for renter households earning between $35,000 and $75,000. Just in the last five years, cost burdened nearly doubled for renters earning $50,000 to $75,000 in each jurisdictions studied. The change in cost burden among owners has been more uniform across income ranges.

Figure V-2. Cost Burden by Tenure , Income, and Jurisdiction, 2010, 2018, and 2023



Source: 2010, 2018, and 2023 5-year ACS, and Root Policy Research.

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

OVERCROWDING

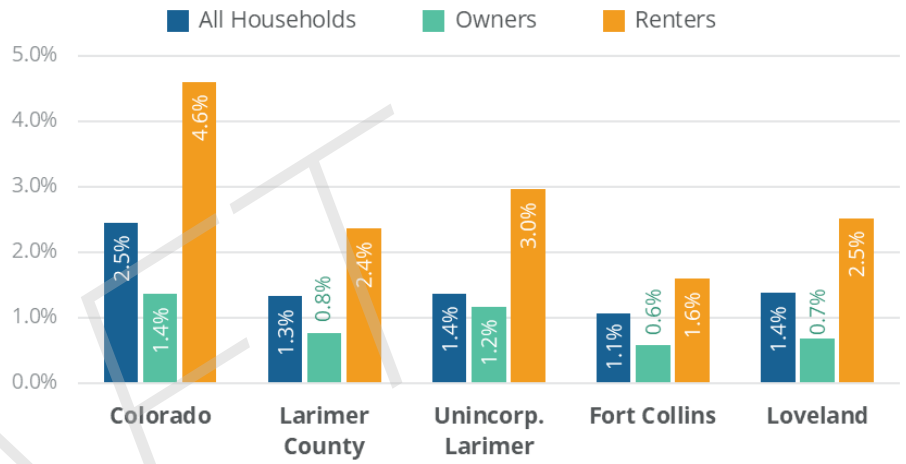
Households containing more than one person per room (note this measure is not per bedroom but per room) are considered "overcrowded" based on industry standards and HUD's definition of housing problems. Research shows that living in a crowded home can negatively affect academic performance, educational outcomes, behavioral health, and physical health—particularly for children.[1]

Overcrowding is typically tolerated in order to manage high housing costs and/or as a result of providing shelter to friends or family who are at risk of homelessness. These households are likely financially stressed and may struggle to manage unexpected emergency costs or absorb rent increases, making them vulnerable to displacement.

- In Larimer County, 1.3% or 2,017 households are overcrowded.
- In the unincorporated county, 1.4% or 365 households are overcrowded.
- In Fort Collins, 1.1% or 755 households are overcrowded.
- In Loveland, 1.4% or 476 households are overcrowded.

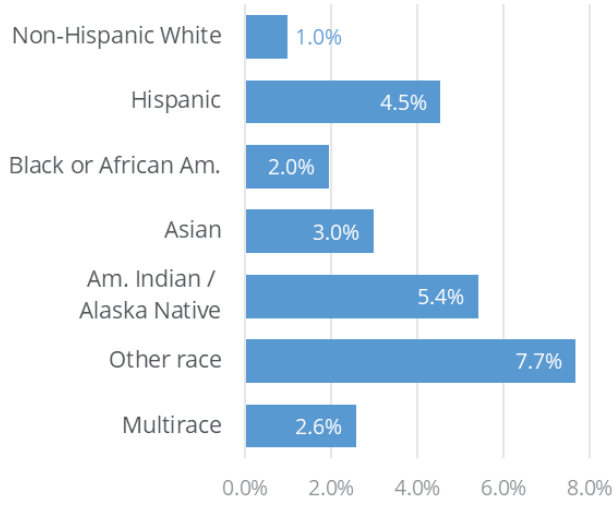
Throughout each jurisdiction, renter households have a higher rate of overcrowding than owner households. Countywide, racial and ethnic minority groups are more likely to be overcrowded than non-Hispanic white households. Rates are particularly high for Hispanic, American Indian / Alaska Native, and "other" race households.

Figure V-3.
Overcrowding by Tenure and Jurisdiction, 2023



Source: 2023 5-year ACS, and Root Policy Research.

Figure V-4.
Overcrowding by Race/Ethnicity, Larimer County, 2023



Source:
2023 5-year ACS, and Root Policy Research.

[1] https://pmc.ncbi.nlm.nih.gov/articles/PMC3805127/

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

INSTABILITY & HOMELESSNESS

The Regional Homelessness Strategy Across Larimer County, drafted in 2025, provides an in-depth look at homelessness and housing instability (risk of homelessness) across the county. This section pulls key data from that report, including sources that represent both cumulative and point in time counts:

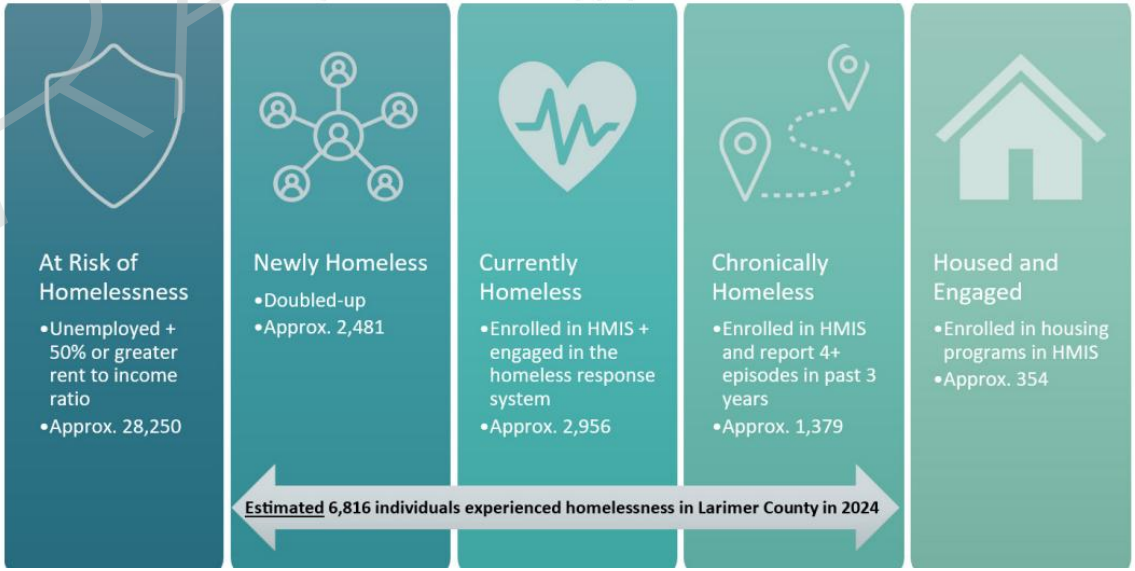
- Homeless Management Information System (HMIS), a cumulative count of the number of unique individuals/households accessing housing or homeless services during the year.
- Point-in-Time (PIT) Count, a single count in January conducted through surveys, street and shelter outreach.

In 2024, in Larimer County 4,335 people experienced homelessness and were enrolled in HMIS and another 2,481 people were doubled up and staying with friends/family (see Figure V-5 from the Regional Homelessness Strategy) for a total estimate of 6,816 individuals experiencing homelessness in 2024 in Larimer County. Demographic data from the HMIS system indicate:

- Men are more likely to be homeless than women: 58% of the homeless population is male (compared to 50% of the overall population); 40% is female; and 2% identified as other).
- The most prevalent age group is residents aged 25 to 44, who have a higher representation among the homeless population than the population overall. Children and residents aged 45 to 54 are proportionately represented in the homeless population, while 18 to 24 year olds and seniors are underrepresented in the homeless population.
- Racial/ethnic minorities are overrepresented in the homeless population (though most people experiencing homelessness in Larimer County identify as white).
- Nearly half (45%) of homeless individuals self-report a mental health condition, as shown through HMIS data.

The 2025 PIT Count identified 581 people experiencing homelessness on a single night about one-third of whom were unsheltered. Loveland had the highest rate of unsheltered homelessness (43% of the 180 individuals identified in the PIT Count). In Fort Collins 27% of 398 people were unsheltered.

Figure V-5. Larimer Population Experiencing and At Risk of Homelessness



Source: Regional Homelessness Strategy Across Larimer County. Available online at https://www.larimer.gov/sites/default/files/regional-homelessness-strategy-across-larimer-county.pdf

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

ACCESSIBLE & VISITABLE UNITS

While there is no publicly available data source that quantifies accessible housing units, there are several industry-standard approaches used to characterize the state of accessibility in the county's housing stock:

- Multifamily units subject to Fair Housing Act adaptability standards and ADA accessibility requirements (using CoStar data);
- The overall proportion of housing stock built before ADA accessibility requirements, including owner occupied stock; and
- The share of households that include at least one member with a disability (as a proxy for accessible/visitable needs).

Accessibility standards for multifamily. The Fair Housing Act requires that all ground-floor units in multifamily developments of four or more units constructed since 1991 be "adaptable" for residents with disabilities, meaning that the unit can be easily made accessible within a short time frame. Additional requirements apply to multifamily developments with elevators: in these developments, all units must be adaptable. Multifamily units developed with the assistance of federal subsidies since 1991 have additional, more specific accessibility requirements: a total of 7% of federally assisted units must be accessible to individuals with mobility issues and hearing or vision disabilities.

As a result, the total number of accessible multifamily units can be approximated by totaling:

- The number of ground-floor units in multifamily developments of four or more units without elevators constructed since 1991;
- The total number of units in multifamily developments of four or more units with elevators constructed since 1991, and
- 7% of the number of federally assisted multifamily units constructed since 1991.

According to CoStar multifamily rental analytics, 222 multifamily rental developments without elevators containing 26,152 units have been built since 1991. Approximately 11,123 of these units are ground floor units and are required to be adaptable by Fair Housing requirements. Another 18 developments with elevators containing 2,715 total units have been built in Larimer County since 1991. All 2,715 of these units are required to be adaptable. These counts include federally assisted multifamily units constructed since 1991.

In total, 13,838 of Larimer County's multifamily rental units built since 1991 are required to be adaptable by the Fair Housing Act.

Pre-ADA housing stock. Forty-four percent of homes in Larimer County—including 41% of owner-occupied units and 48% of renter occupied units—were built prior to 1991 when accessibility requirements were established for residential construction. It is likely that a large share of these units are likely in need of accessibility features and updates in general (e.g., grab bars in the bathroom, stepless entry).

Accessibility needs. According to HUD estimates, 20% of Larimer County households contain at least one member with a disability. Based on this rate, approximately 20% of future housing units in the county should be made accessible.

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

DISPLACEMENT RISK

Informally, displacement means leaving one's home or relocating one's business due to redevelopment of property or inability to afford cost of living or cost of doing business due to price increases or loss of income. The formal definition of displacement according to SB24-174 is included below.

SB24-174's definition of displacement*

Per Section 24-32-3701(4), "displacement" means:

- **(a)** the involuntary relocation of residents, particularly low-income residents, or locally owned community serving businesses and institutions due to:
  - **(I)** increased real estate prices or rents, property rehabilitation, redevelopment, demolition, or other economic factors;
  - **(II)** physical conditions resulting from neglect and underinvestment that render a residence uninhabitable; or
  - **(III)** physical displacement wherein existing housing units and commercial spaces are lost due to property rehabilitation, redevelopment, or demolition; or
- **(b)** indirect displacement resulting from changes in neighborhood population, if, when low-income households move out of housing units, those same housing units do not remain affordable to other low-income households in the neighborhood, or demographic changes that reflect the relocation of existing residents following widespread relocation of their community and community serving entities.

** This definition of displacement also appears in HB24-1313.*

Source: SB24-174 Displacement Risk Assessment Guidance.

This section covers displacement risk indicators, community and business owner perceptions of displacement, and disadvantaged areas (using metrics and data sources in DOLA's displacement risk analysis guidance).

Displacement risk indicators. The SB 24-174 Displacement Risk Assessment Guidance suggests that jurisdictions evaluate the following potential indicators to gauge displacement risk. (Figure V-6 shows these displacement measures for Larimer County overall, unincorporated areas, Fort Collins, and Loveland).

1. **Low-income households** lack sufficient income to afford market rate housing and are more likely to live in areas that face redevelopment pressures.

   About 67,000 households in the County (44% of all households) are "low income" by HUD standards. The proportion is similar in Loveland (42%) but higher in Fort Collins (50%) and lower in unincorporated areas (34%).

2. **Renter households** are more likely to experience displacement than owner households because they do not own their homes and are more immediately vulnerable to market changes and rent increases.

   Countywide, 36% of all households are renters. The proportion is similar in Loveland (38%) but higher in Fort Collins (48%) and lower in unincorporated areas (11%).

3. **Cost burdened renter households with annual income <$75,000** have less disposable income to cover monthly expenses and typically have lower savings to cover unexpected expenses. As a result, they are at greater risk of falling behind on rent and facing potential displacement.

   As discussed earlier in this section, cost burden is relatively high for households earning less than $75,000—69% of this income group is cost burdened. Cost burdened households earning less than $75,000 account for 27% of all households in the county.

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

4. **Adults without high school diplomas** have limited access to higher paying jobs and less job security. Without stable employment, these residents may miss rent payments and face eviction.

   According to ACS data only 3% of residents over the age of 25 in Larimer County have less education than a high school diploma. This rate is slightly higher in unincorporated areas (5%), but still below the state average of 7%.

5. **Populations with limited English proficiency** may have difficulty navigating housing, jobs, transportation, and supportive services due to language barriers and discrimination.

   There are about 8.000 residents countywide who are older than five years and speak English less than very well (accounting for 2% of the total population).

6. **Single parent households** must manage rising childcare and housing costs on one income, while two parent households often benefit from two earners' incomes. As a result, single parents are more vulnerable to housing instability and displacement.

   Six percent of Larimer County households (about 9,400 households) are single parent households. This proportion is higher in Loveland (which has a higher proportion of households with children in general). As discussed in Section I, single mothers in particular are much more likely than other households to be living in poverty in Larimer County.

7. **Housing units built before 1970** are more likely to contain lead-based paint—a significant health hazard—and to need repairs due to their age. Residents in these units may be destabilized by the high cost of making repairs or live in unsafe conditions because they cannot afford repairs or landlords will not make the repairs.

   In Larimer County, about 26,000 units (16% of the housing stock) were built before 1970. That rate is higher in unincorporated areas (22%).

8. **Households headed by BIPOC residents:** Historical and ongoing employment and housing discrimination against BIPOC households has limited these households' housing choices and general opportunity to build stabilizing wealth, leaving BIPOC households vulnerable to displacement.

   Fifteen percent of Larimer County households are BIPOC headed households. They have a slightly higher representation in Fort Collins (17%) and lower in Loveland (13%) and unincorporated areas.

9. **Overcrowded households** (households containing more than one person per room) are typically tolerating overcrowded conditions to manage housing costs and/or as a result of providing shelter to friends or family who are at risk of homelessness. These households are likely financially stressed and may struggle to manage unexpected emergency costs or absorb rent increases.

   Overcrowding is discussed earlier in this section by tenure and by race/ethnicity (see previous Figures V-3 and V-4). In Larimer County, 1.3% or 2,017 households are overcrowded.

10. **Residents with disabilities** tend to have lower incomes due to limited employment options and may live on fixed incomes. Therefore, their housing options are limited by affordability and the need for accessibility features in their home, which tend to be expensive.

    One in ten Larimer County residents has some type of disability: 37,342 residents. The rate of disability is highest in unincorporated areas (24%), which has an older population, more likely to have some type of disability.

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

11. **Older residents (65+)** are likely to need accessibility modifications as they age in their homes. Such modifications can be expensive and difficult to manage for elderly residents who are likely to be retired and living on fixed incomes. Other older residents may need supportive living environments such as those offered by skilled nursing facilities.

    As discussed in Section I, the number (and proportion) of older adults has been increasing steadily in Larimer County (in line with state and national trends)—and forecasts show a continuation of that trend through 2050. Residents over 65 account for 17% of the county population, 24% in unincorporated areas, 21% in Loveland, and 12% in Fort Collins.

12. **Mobile/manufactured homes**[2] are a form of naturally occurring affordable housing that allow lower income residents to become homeowners. Although they create more housing choice, manufactured home parks can also be an environment of uncertainty. Most mobile home owners do not own the land underneath their home and pay a monthly lot rent. This subjects tenants to lot rent increases that could make monthly payments unaffordable and is complicated by limitations on mobility—moving manufactured homes is often cost-prohibitive and in some cases illegal.

    The manufactured housing market is discussed in detail in Section III. Housing Inventory. There are 5,651 manufactured homes in Larimer County, a majority of which (91%) are located in mobile home parks. About 31% were built before 1976, which means they cannot be legally moved. Mobile homes account for 3% of the total housing stock.

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[2] Here, the terms "mobile home" and manufactured home" are used interchangeably. Technically "mobile home" refers to homes built before 1976 and "manufactured housing" applies for units built after 1976. However, the terms are commonly used interchangeably, and we have followed that practice here.

SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

Figure V-6. Displacement Risk Indicators

Displacement Measure	Larimer County			Unincorporated Areas			Fort Collins			Loveland		
	Total	Owner	Renter	Total	Owner	Renter	Total	Owner	Renter	Total	Owner	Renter
Low Income Households	66,722	29,930	36,792	9,012	7,262	1,751	35,699	11,265	24,433	14,510	7,338	7,172
0-30% AMI Households	21,063	8,112	12,952	2,475	1,929	546	10,989	2,589	8,400	5,646	2,034	3,612
31-50% AMI Households	15,605	7,525	8,080	2,533	2,045	488	7,907	2,258	5,649	3,193	2,067	1,127
51-80% AMI Households	30,054	14,293	15,760	4,004	3,288	717	16,803	6,419	10,383	5,670	3,237	2,433
	Number	% of Total (HH, Units, or Pop.)		Number	% of Total (HH, Units, or Pop.)		Number	% of Total (HH, Units, or Pop.)		Number	% of Total (HH, U, Pop)	
Renter Households	54,080	36%		2,934	11%		33,897	48%		13,176	38%	
Cost Burdened Households with Income < $75,000	41,515	27%		5,271	20%		22,464	32%		10,114	29%	
Cost Burdened Renters with Income < $75,000	25,401	17%		1,070	4%		17,157	24%		5,633	16%	
Cost Burdened Owners with Income < $75,000	16,114	11%		4,201	16%		5,307	7%		4,481	13%	
Residents with no High School Diploma (Age 25+)	8,186	3%		2,685	5%		2,485	2%		2,332	4%	
Residents 5+ who Speak English "Less than Well"	7,891	2%		1,701	3%		4,214	3%		1,427	2%	
Single-parent Households	9,419	6%		1,205	5%		4,281	6%		2,895	8%	
Housing Stock Built Before 1970	25,920	16%		6,974	22%		11,228	15%		5,988	17%	
BIPOC Households	21,991	15%		3,198	12%		11,654	17%		4,481	13%	
Overcrowded Households	2,017	1%		365	1%		755	1%		476	1%	
Population with a Disability	37,342	10%		7,465	11%		14,890	9%		10,592	14%	
Older Population (65+)	61,264	17%		15,806	24%		20,731	12%		16,345	21%	
Mobile / Manufactured Homes	5,276	3%		3,094	10%		1,429	2%		538	2%	

Source: 2024 1-year ACS, 2023 5-year ACS, and Root Policy Research.

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

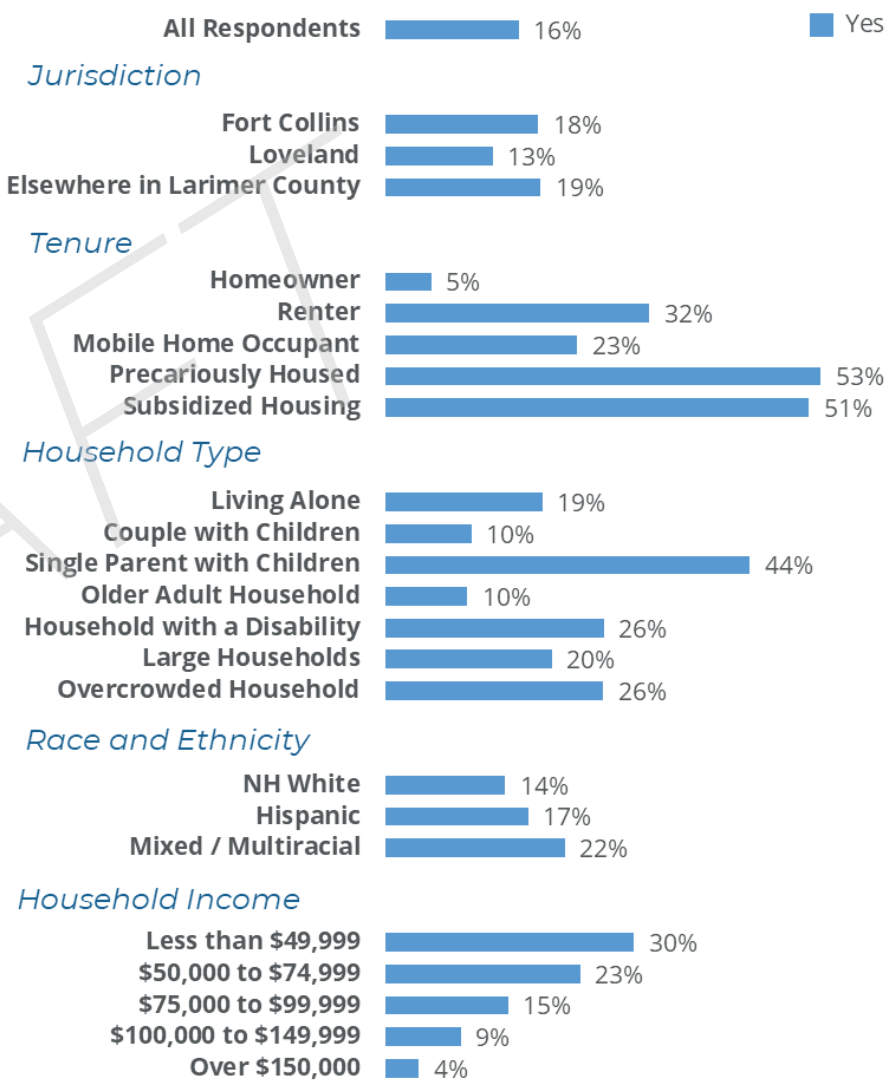
Community experience with displacement. Causes and consequences of displacement in Larimer County were captured through resident focus groups and a resident survey that garnered 1,146 responses. Community engagement—including findings from the focus groups and survey—are discussed in detail in Sections VI and VII but findings relevant to displacement are below.

Housing stability. Sixteen percent of respondents in the Larimer County Resident Housing Survey[3] reported they have experienced displacement, defined as having to move in the past 5 years when they did not want to. As shown in Figure V-7, precariously housed respondents (living with friends or family but not on the lease), respondents who live in subsidized housing, and single parents had the highest rate of reported displacement. The top reason for displacement reported by respondents was rent increasing more than they could afford, followed by job loss or reduced hours that resulted in reduced wages.

In a resident focus group with people experiencing homelessness, participants shared that medical crises, employment disruptions, family instability, and difficulty re-entering the workforce after injury or incarceration were reasons for their initial displacement. Residents who received housing navigation and rental assistance shared that their housing stability stemmed from chronic illness, conflict with a partner, and financial difficulty caring for adult children with disabilities.

Among survey respondents who experienced displacement in the past 5 years, 72% reported that it took more than one month to find a new place to live. Over half (55%) experienced higher rent or housing costs after displacement—suggesting that displacement can quickly become a recurring experience. In addition, one-third of respondents reported longer commutes to work or school, and 30% said that their quality of apartment or home was worse than the one from which they were displaced.

Figure V-7. Have you had to move out of a home, condo, or apartment when you did not want to?



Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey..

[3] See Section VII for additional details on survey methodology and findings.

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

Conditions. Poor housing conditions can be a precursor to displacement—16% of respondents who experienced displacement reported that poor conditions were a reason for moving. People may be forced to move for health reasons or because they cannot financially keep pace with repairs needed.

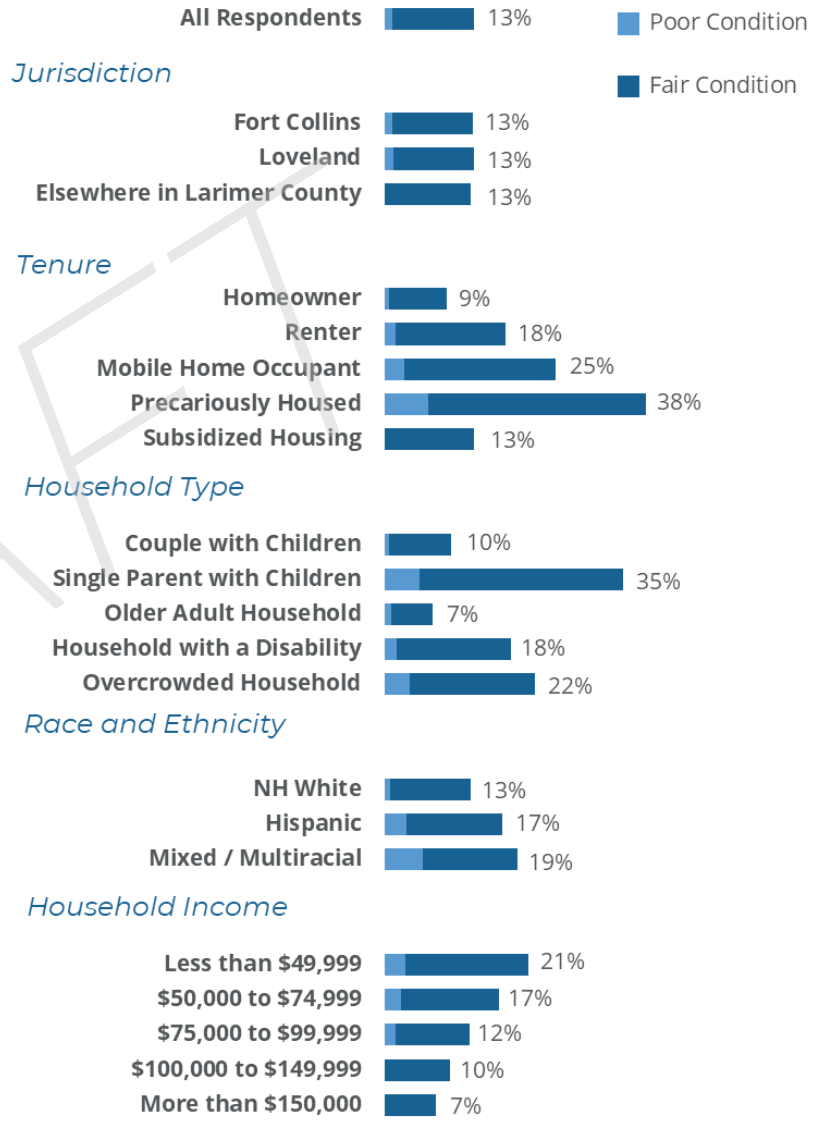
Figure V-8 displays the combined percentage of respondents who rated their home in poor condition (defined as a home or apartment with major problems that are not healthy or safe) and in fair condition (defined as a home or apartment needs a lot of work):

- Precariously housed residents, (living with friends or family but not on the lease) reported the highest rate of poor or fair housing conditions (38%). Single parents had the next highest rate at 35%;
- Renters reported poor or fair housing conditions at double the rate of homeowners (18% compared to 9%). Mobile home occupants had particularly high rates of poor housing conditions; and
- Condition ratings improved as household income increased.

Business stability. 43 employers in Larimer County responded to a survey to detail business challenges related to housing costs. Forty one percent strongly agreed that the cost and availability of housing makes it hard to recruit, hire, and retain employees and 50% reported that it adds time to the commute to and from work for their employees. Despite these challenges, most employers (46%) did not view housing cost and availability as a reason to move operations or base employees elsewhere.

In open-ended answers, one employer said that there are fewer longtime, loyal customers because of the lack of stable, affordable housing in the county. Others said they cannot pay wages high enough to support local housing costs and that they have observed their employees struggling to enter housing due to security deposit cost. (Note that starting in 2026, Colorado security deposit law caps deposits at one month's rent and allows payment in up to six monthly installments (HB25-1249)).

Figure V-8. Poor and Fair Housing Condition Ratings



Note: n = 1,116.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

Disadvantaged areas. DOLA HNA Guidance suggests local governments identify areas that qualify as "disadvantaged" using the Climate and Economic Justice Screening Tool (CEJST) from the Council on Environmental Quality of the United States. The CEJST tool identifies a Census Tract as disadvantaged based on the extent of its environmental and socioeconomic burdens relative to other Census Tracts in the United States. The tool classifies three tracts in Larimer County's as disadvantaged (see Figure V-9). Reasons for each tract's classification are discussed below.

A Census Tract bordering Estes Park qualifies as disadvantaged for the following reasons:

- Expected population loss resulting from natural hazards (99th percentile);
- Relatively high risk of property value loss associated with natural hazards (84th percentile), wildfire risk (83rd percentile), and flood risk (72nd percentile); and
- Share of low-income households (71st percentile).

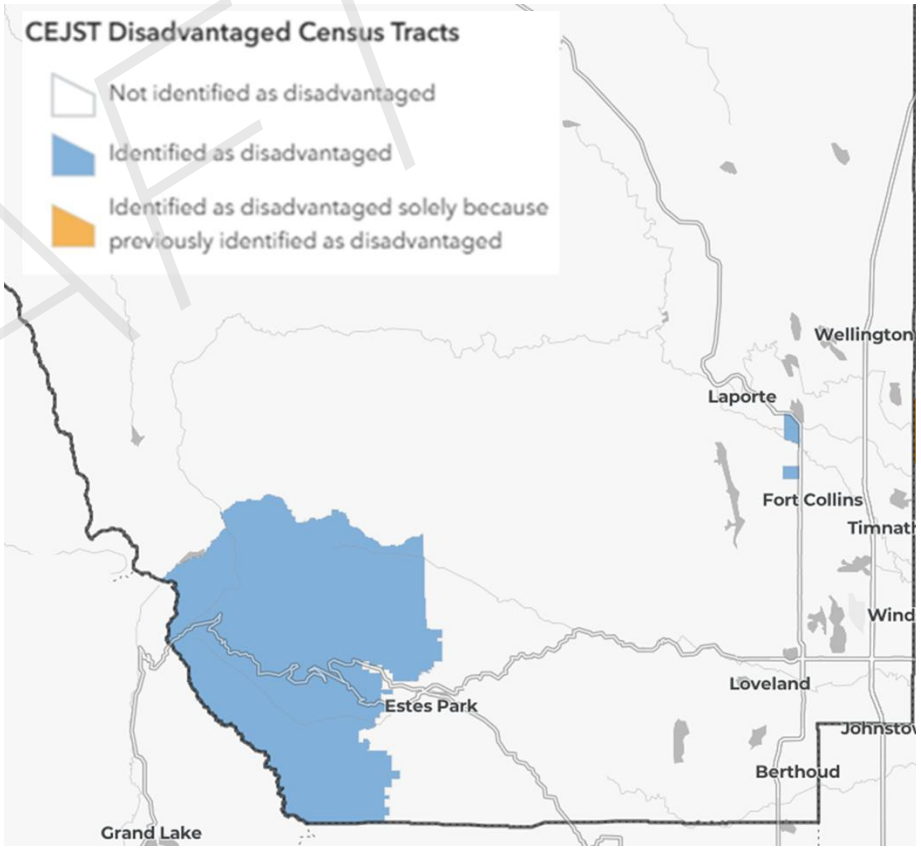
A Census tract in central Fort Collins qualifies due to:

- A relatively large share of residents have been diagnosed with asthma (99th percentile).
- Relatively high unemployment rate (99th percentile); and
- Share of low-income households (79th percentile) and low-income households that are cost burdened (99th percentile).
- Note that this tract does include the Colorado State University campus; some disadvantages among students may be short-term.

A Census tract on the northern edge of Fort Collins qualifies due to:

- Relatively low educational attainment (24% of its residents aged 25 or older did not graduate from high school).
- Share of low-income households (90th percentile);
- Many residents face energy burden, spending a relatively large share of their income on energy costs (97th percentile).
- Significant natural hazard risks: property value loss (98th percentile), population loss (97th percentile), flood risk (88th percentile), and wildfire risk (82nd percentile).

Figure V-9. CEJST Disadvantaged Tracts in Larimer County



Source: Climate and Economic Justice Screening Tool.

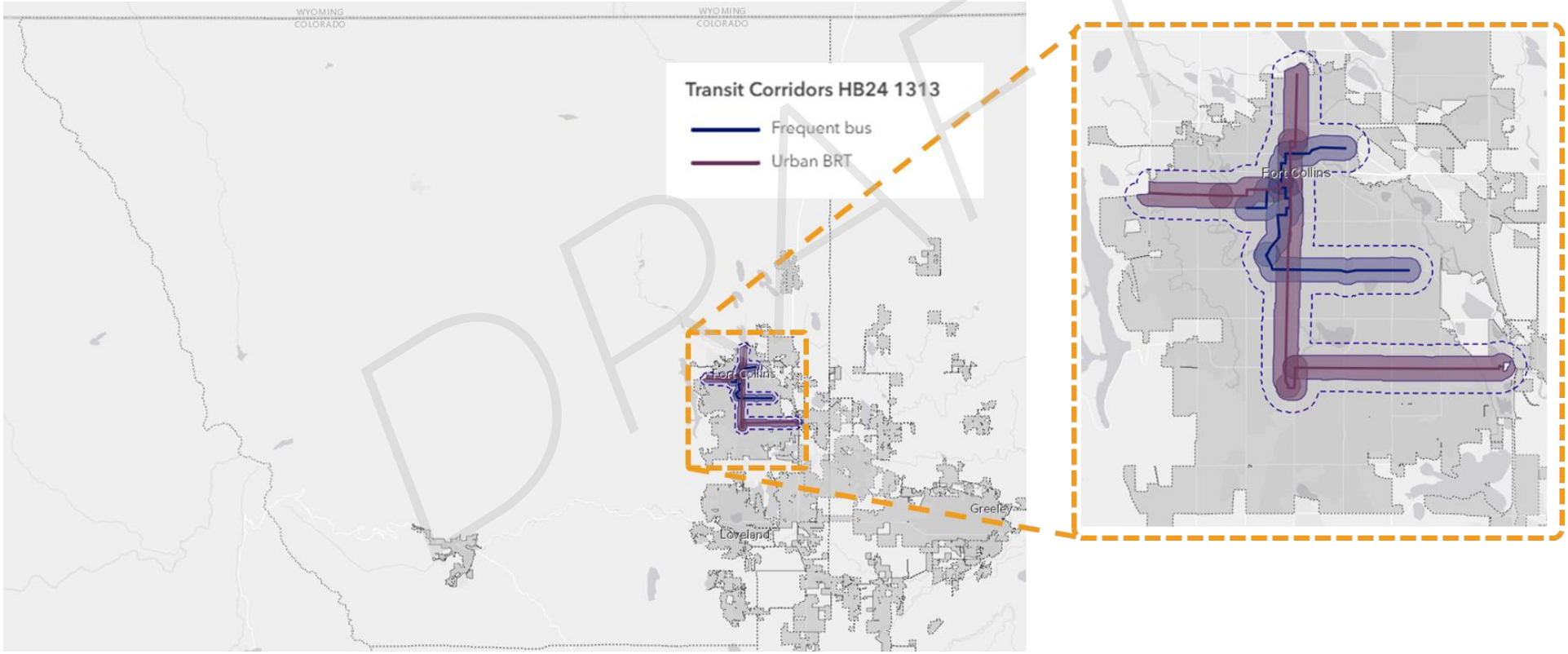
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SECTION V. HOUSING PROBLEMS & DISPLACEMENT RISK

Areas with increased zoning capacity. In some cases, areas that get rezoned for additional zoning capacity may experience a sudden rise in property values and redevelopment interest. HB24-1313 requires designated Transit Oriented Communities to create enough zoning capacity around transit centers to meet or exceed their Housing Opportunity Goals, which in some cases may require rezoning for additional density.

Fort Collins is the only jurisdiction in Larimer County that is designated as a Transit Oriented Community, as shown in Figure V-10. The TOD areas in Fort Collins already have sufficient zoning capacity to comply with HB24-1313, but the designated areas are included here for reference (as prescribed in the state guidance on HNAs).

Figure V-10. Applicability of HB24-1313, Transit-Oriented Communities



Source: HB24-1313 Transit Oriented Communities Interactive Map and Mapping Documentation.

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SECTION VI. COMMUNITY ENGAGEMEMENT SUMMARY

This section provides an overview of engagement efforts and shares input from residents and stakeholders on housing challenges and solutions. This section focuses on community meetings, stakeholder consultation, the employer survey, and resident focus groups. The resident and in-commuter survey is discussed in the subsequent section (Section VII).

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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

ENGAGEMENT OPPORTUNITIES

This section summarizes feedback gathered from residents and stakeholders across a variety of engagement efforts:

1. **Community meetings.** Two community meetings were held prior to the HNA drafting: One in the City of Fort Collins and one in the City of Loveland. Participants provided input on housing needs, funding and outcome priorities, personal and community tradeoffs they would be willing to make for housing to be more affordable, and distinguished private and public roles in making housing more affordable in their community. (There was also an open meeting conducted in Red Feather Lakes, but that input is included with resident focus groups based on the structure of the meeting).

   In addition, the draft HNA will be made public and presented to Loveland City Council, Fort Collins City Council, and Larimer County Board of County Commissioners.

2. **Stakeholder consultation** included focus groups, one-on-one interviews, and a tailored stakeholder survey. Participants included developers, economic development officials, service providers for people experiencing homelessness, residents with mental and physical disabilities, older adults, mobile home community advocates, and residents in public housing.

3. **Employer survey.** A survey targeting small businesses and employers in the region was marketed through chambers of commerce, business associations, and economic development departments throughout the region to collect input about the challenges employers face due to the rising cost of housing.

4. **Resident focus groups.** Targeted focus groups were conducted with residents living in mountain/rural communities, members of the Larimer County Agricultural Advisory Board, mobile home communities, people experiencing homelessness, older adults, and families receiving rental and utility assistance to better understand the unique barriers these groups face when accessing housing and community resources in the region.

5. **Resident survey.** An extensive survey about housing needs and solutions was promoted (in both English and Spanish) from September through November 2025 and received 1,146 responses. Responses to the resident survey are discussed in Section VII.

The Root Policy Research team, Larimer County, and the Cities of Loveland and Fort Collins are extremely grateful to the residents and in-commuters who shared their experiences and perspectives by participating in community meetings, focus groups, and surveys, as well as to the business leaders, service providers, developers, and other stakeholders who made time for interviews, focus groups, and surveys—and shared resident engagement opportunities through their networks.

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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

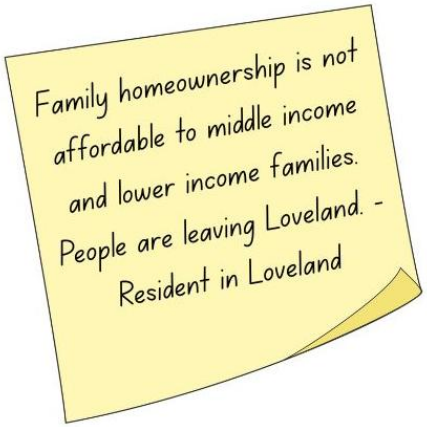
COMMUNITY MEETINGS

Community meetings were held in the City of Fort Collins and the City of Loveland. There were four activities that structured conversation:

- Poster board activity for residents to share their housing concerns;
- Prioritization activity that asks residents to allocate budgets to 16 different housing and community development activities;
- A tradeoff exercise that asked residents about options to make their community more affordable; and
- A poster and dot activity that asked residents to contemplate public and private responsibility in the creation of affordable housing.

All materials were presented in English and Spanish. About 30 residents participated in community meetings; feedback is supplemented through focus groups and the resident survey.

Housing needs. Participants in both Fort Collins and Loveland emphasized the growing mismatch between available housing and community needs. Residents repeatedly noted a lack of affordable units, specifically for low- and moderate-income households. Many participants also highlighted the need for "missing middle" housing types, such as duplexes, triplexes, and small single-family homes, that would best suit younger individuals, small families, and middle-income households who earn too much to qualify for subsidies but too little to afford market-rate housing.



Residents in both cities felt that developers prioritize large, expensive homes and that local governments should do more to support or require affordable development.

Fort Collins participants noted an erosion of affordability in both rental and ownership markets. Overall, conversations reflected frustration with rising costs and desire for more varied and flexible housing solutions, including the following resident suggestions.

- Residents wanted to see more small, attainable homes to help fill gaps in the housing spectrum, like duplexes, triplexes, townhomes, and tiny or modular homes.
- Residents also suggested incentives for purchasing and rehabilitating older homes as a lower-cost ownership option, as opposed to new developments unaffordable to first-time buyers.
- Several wanted affordability requirements for new development and more transparency from developers about pricing.
- Some participants called for a higher income limits for housing assistance and subsidies for the "missing middle" to aid working households that don't' qualify for existing affordability programs.

In Loveland, participants voiced similar concerns, but emphasized deeper structural issues tied to affordability and accessibility. Residents described difficulty finding wheelchair-accessible homes. It took one resident over three months to find a home that could accommodate her father's wheelchair and housing costs took up over 40% of their combined household income of four working adults.

Participants highlighted the need for maintenance, repair, and accessibility programs, particularly for older adults and people with disabilities.

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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

Some participants shared additional barriers to finding housing. One individual who experienced homelessness said he struggled to find resources to get a permanent address to apply for identification, a crucial step in finding his own apartment and accessing other resources. Another said she fell behind in student loan payments and her credit score plummeted as a result. She was able to find a cosigner to get an apartment, but wondered how people without the ability to find one would be able to obtain housing.

Residents in Loveland proposed vacancy taxes on underutilized properties, expanded partnerships with schools and workforce programs to develop modular housing (much like the BoulderMOD model in Boulder County), and greater city investment in publicly financed or community-owned housing. Another person suggested mixed-income housing that provided spaces for older adults and nurses to both provide workforce housing for healthcare providers while addressing the need for in-home care services.

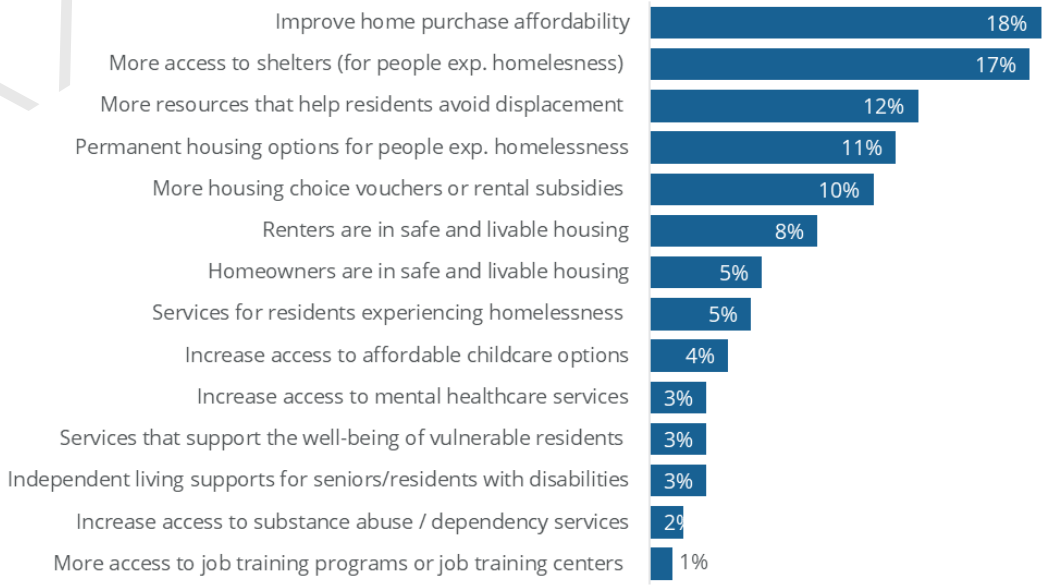
The overall sentiment reflected urgency and desire for bold, creative approaches to restore affordability and ensure inclusive growth in Loveland.

Figure VI-1. Sticky Note Board from Loveland Community Meeting



Prioritization activity. In this activity, participants were given 10 pennies to allocate between 15 outcomes to simulate funding constraints. They could allocate all pennies in any way based on their priorities, for example, all 10 pennies could be allocated to one cup, spread evenly, half to one cup, etc. As shown in Figure VI-2, the most "funds" were allocated to home purchase affordability and homeless shelters.

Figure VI-2. Funding Priority Penny Allocations



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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

Housing tradeoffs. Participants "voted" to determine which "trade-offs" they would be willing to make for their community to be more affordable. Tradeoff options included personal choices (e.g., paying more in taxes, renting out a room or building an ADU) as well as community changes (e.g., more density, less parking, etc.)

The trade-offs with the most votes were "Paying $50 per year in taxes to support an affordable housing fund" and "Allowing duplexes or townhomes in my neighborhood."

Responsibility for addressing housing challenges. Participants were asked to identify who they believed should take responsibility for addressing community housing challenges— the government, nonprofits or private sector. The activity board sparked conversations about intergovernmental collaboration, city incentives for affordable housing development, city funding for nonprofits, and the importance of coordinating local efforts with existing service providers and private-sector goals.

In Loveland, participants generally felt that local and state governments should take the most responsibility for housing issues, with the exception of providing affordable entry-level homes to buy, which they believed should fall to the private sector. Figure VI-4 shows responses in Loveland (note that dot color does not have any significance).

Figure VI-3. Trade-Off Votes in Fort Collins and Loveland

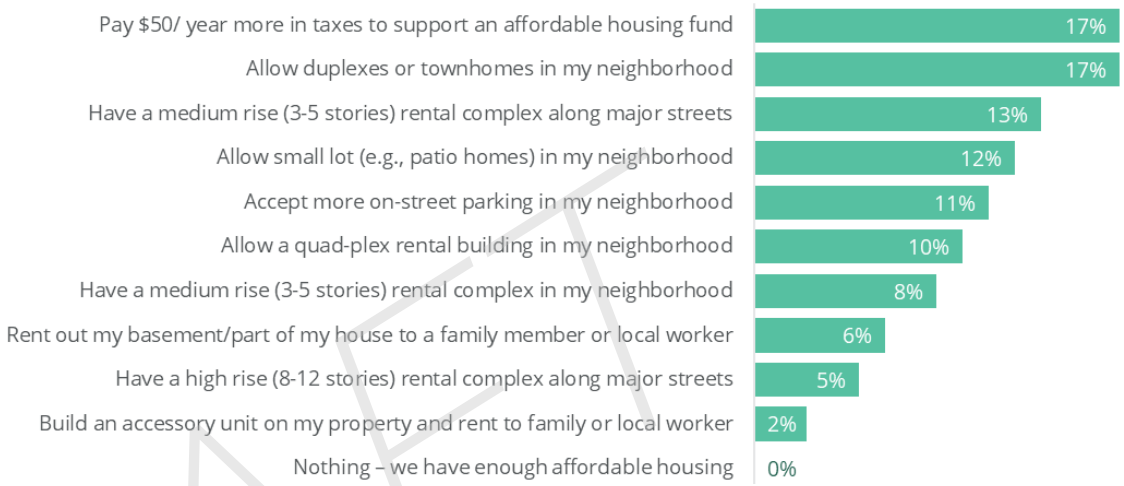
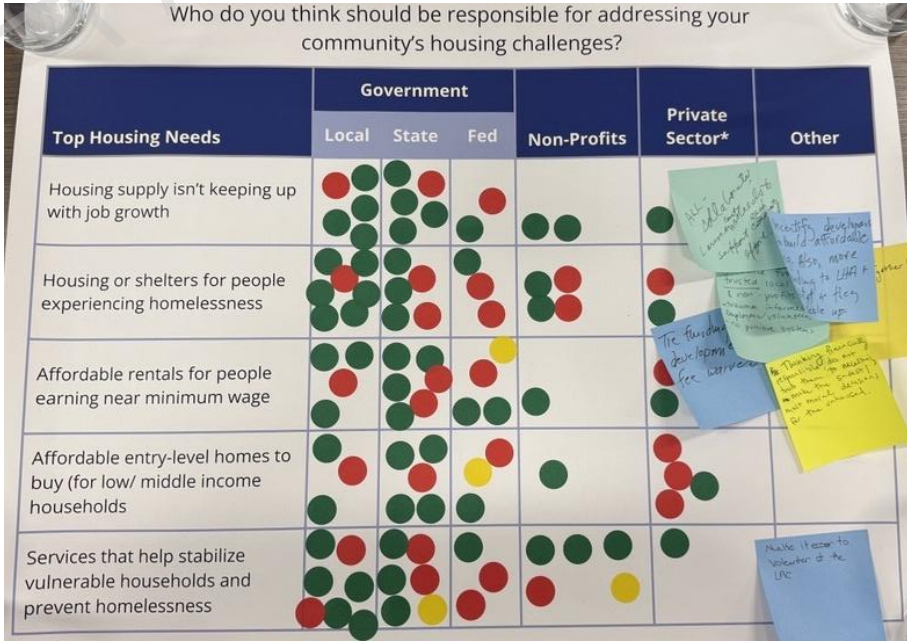


Figure VI-4. Responsibility for Addressing Housing Challenges, Loveland



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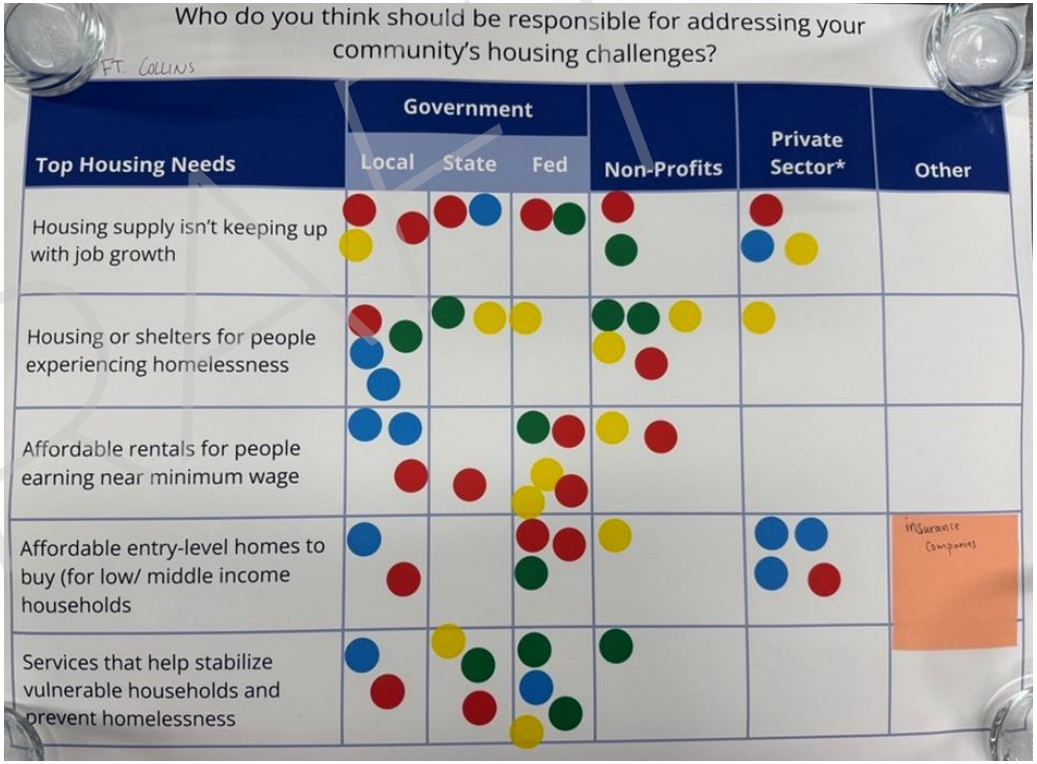
SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

A deeper discussion emerged about differences between what participants *wanted* to see happen and capacity to execute on that vision. One participant noted she wanted the city to be financially responsible for housing and homeless services but did not necessarily want the City to manage those services. Another added that "locally funded sources for unhoused people" should be guided by "trusted local groups and nonprofits that include trauma informed employees or volunteers." Others clarified that their responses reflected desire for more collaboration between state and local governments.

Additional ideas shared on the activity board included city-incentives for private-sector developers to build more affordable housing (such as associating funding with development fee waivers), and increasing funding for the Loveland Housing Authority and Habitat for Humanity "so they can scale up. (Note that Loveland and Fort Collins both offer such incentives currently).

In Fort Collins, participants tended to assign responsibility for expanding housing supply to both local governments and the private sector. When it came to housing or shelters for people experiencing homelessness, participants identified local government and non-profits as most responsible. Participants also wanted to see greater federal involvement in keeping rents affordable for people earning near minimum wage and in funding homeless services, while identifying the private sector as the primary actor in creating affordable, entry-level homes to buy. Figure VI-5 shows responses in Fort Collins (again, the color of dot is not meaningful).

Figure VI-5.
Responsibility for Addressing Housing Challenges, Fort Collins



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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

STAKEHOLDER CONSULTATION

Stakeholders representing service providers, housing developers, and planning staff participated in focus groups and one-on-one interviews. Across the county, stakeholders described a housing landscape increasingly defined by limited housing stock and a mismatch between what is being built and what residents can afford. Participants from service agencies, planning departments, and community coalitions shared perspectives on the structural barriers to affordability and the material hardship they cause to residents. Their observations highlighted shared challenges across Northern Colorado communities, while detailing how unique geography, governance, and local economies shape the experience of housing instability in Larimer County. Several themes emerged:

- Housing affordability remains the most pressing challenge across Larimer County, with both rental and homeownership opportunities out of reach for low- to moderate-income residents.
- Certain populations face disproportionate housing barriers, including seniors on fixed incomes, families seeking larger affordable units, individuals needing temporary or emergency housing, and service industry employees. Seasonal employment and income volatility add to these challenges, particularly in mountain communities like Estes Park.
- A mismatch between existing housing supply and local needs persists across the region. Stakeholders noted shortages of deeply affordable and smaller units (one bedroom or studios), accessible senior housing, transitional or temporary housing options, and smaller for-sale homes for first time buyers.
- Barriers to new development include high construction costs, financing costs, limited developable land, community opposition, infrastructure constraints, and zoning barriers.
- Gaps in services affect residents with the greatest housing needs. Stakeholders pointed to limited emergency shelter beds, lack of temporary housing options with wrap-around services, transportation challenges (especially in rural and mountain areas), and difficulty accessing county-level programs from outside the Front Range; and
- Stakeholders suggested targeted solutions, including expanding rental and utility assistance, lowering income thresholds for workforce and senior housing to help more people qualify, increasing development incentives for units serving households less than 60% AMI, improving county service access in rural areas, and continuing to support local collaborative networks that have been effective in meeting residents' needs.

Common housing challenges. The most consistent theme across all stakeholders was the rising cost of housing relative to local wages. Service providers, developers, and planners all described a widening gap between incomes and rent or mortgage payments, even for residents who are steadily employed. In Loveland, school district staff reported that students are increasingly "doubled-up" with relatives or friends as the price of rents outpaces what most households can afford. Similarly, in Fort Collins, providers perceived eviction rates going up, driven by nonpayment of rent and minor code violations used to remove tenants in competitive markets. In Estes Park, service providers noted that even new workforce housing developments are unaffordable for many of the seasonal workers they are designed to serve.

Stakeholders frequently tied these affordability issues to regional housing supply issues. Across communities, stakeholders described a shortage of deeply affordable housing and an excess of higher-end developments that do little to relieve demand at the lower end of the market. Stakeholders in the development and planning fields in Fort

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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

Collins acknowledged that while overall vacancy rates have improved, this has not translated to affordability. As one participant summarized, "We are at a healthier spot at the macro-level, but that does not mean people can afford to live here."

Beyond cost, housing instability is compounded by high security deposits, application fees, limited transportation (especially in mountainous areas), and a lack of transitional or emergency shelter space. Loveland stakeholders were concerned that the absence of any temporary housing put residents in crises at heightened risk of immediate homelessness. The city only has a domestic violence shelter available locally and few options for families without children.

Populations most impacted. While affordability concerns cut demographics, several groups emerged as particularly vulnerable.

Families with children, especially those doubling up with friends or family and in overcrowded conditions, face mounting barriers in Loveland and surrounding rural communities. School staff cited transportation limitations, housing affordability, and access to services as challenges for keeping families stable.

Seniors were identified as another group facing disproportionate hardship. Many older adults with fixed-incomes struggle with escalating rents, utility costs, and a lack of smaller, accessible homes to downsize into.

One stakeholders remarked that "normal person price range" options are vanishing for single adults and retirees who fall between assistance program eligibility and market prices. In Loveland, homeless service providers are observing an increase in seniors experiencing homelessness.

Providers also pointed out that single men typically have less access to housing support and there are few affordable studios or one-bedrooms to accommodate their housing needs. Other single-person households, commonly seniors, are also impacted by the limited availability of smaller, affordable units.

In Estes Park and other tourism-dependent areas, service workers and residents with seasonal or variable incomes are at increased risk of housing instability. Housing assistance programs tied to annual income qualifications do not account for fluctuating wages, leaving some workers ineligible for assistance during summer months and overburdened in the off-season. They also noted that "super middle-class households" that earn too much to qualify for subsidies but too little to purchase market-rate homes are struggling to stay in resort and gateway communities as their families grow.

Youth and young adults aging out of foster care or experiencing family conflict were highlighted in Fort Collins as an overlooked population. Providers described the difficulty these young people face securing rentals without cosigners, establishing adequate credit history, or saving for deposits. While targeted voucher programs exist, they are limited in scope and typically only apply to youth with previous foster care involvement, and finding landlords willing to rent to young tenants remains challenging. Stakeholders across all communities stressed the need for more family shelters and youth housing options that bridge the gap between crisis response and long-term stability.

Gaps in housing supply. Almost all stakeholders identified a mismatch between existing housing stock and community needs. The greatest deficits are in deeply affordable rental units, smaller one-bedroom and studio apartments for individuals and seniors, and transitional or temporary housing for those in crisis. Loveland

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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

stakeholders lamented the disappearance of tent shelters, and motel vouchers, which once served as a last resort.

In Fort Collins, providers pointed to limited housing for low-income homeowners and renters alike, as most new construction targets the luxury or upper-moderate market. Developers added that while they were interested in building at the 30% to 60% AMI level, land and infrastructure costs make such projects impossible without subsidies or donated land.

Stakeholders also called attention to underutilized solutions such as manufactured housing, accessory dwellings units (ADUs), and smaller infill developments. One stakeholder emphasized that mobile homes are the "original tiny home" and that some policy solutions can build on existing affordable housing types and communities. Several participants advocated for expanding public understanding of different housing types given that community resistance and restrictive zoning continue to constrain these options.

Across communities, there was a shared sense that the region must embrace smaller, denser, and more creative approaches to meet demand.

Barriers to affordable housing development. Developers and praised recent policy reforms like the removal of parking requirements for multifamily residential (HB24-1304) and allowance of ADUs anywhere single-family homes are zoned (HB24-1152) as having eased some regulatory barriers. However, other barriers, such as the high cost of financing, public opposition to development, and other market-based challenges remain obstacles to delivering housing.

Stakeholders noted that the cost of materials, infrastructure, and labor still makes affordable housing difficult to deliver. Material and labor costs have risen over the past five years, and high interest rates in the last few years add significant costs to financing development. The cost of land was also described as a barrier.

Another recurring barrier is community opposition to affordable housing. Stakeholders in both Loveland and Fort Collins reported persistent NIMBY ("Not in My Backyard") resistance driven by fears about traffic, property values, neighborhood character, and loss of open space. Several stakeholders reported that even modest infill or multifamily proposals trigger strong backlash, often delaying or derailing projects.

Planners noted some progress overcoming this resistance through education and new messaging strategies. In one Fort Collins example, a specific redevelopment site created polarization between those who wanted strictly open space vs residents wanting recreational space and/or development. The city engaged a representative cross-section of residents (Citizen's Assembly) to develop recommendations for the site's future, which then went on the ballot as an option and was selected by voters as the preferred outcome. The Citizens Assembly reflects a successful case study of engaging a representative group of citizens to problem solve high profile issues.

The Loveland Affordable Housing Task Force has also promoted events to discuss affordable housing strategies with residents in community hubs, like cafes and bars. While efforts to garner more community support for affordable housing in the city, stakeholders in Loveland highlighted the limited number of nonprofit developers and would like to see more incentives for market-rate developers to integrate affordable units into new projects. Stakeholders also suggested additional education/outreach related to the need for additional housing (and density).

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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

Access to supportive services. Stakeholders emphasized that supportive services are critical to ensuring housing stability. Service providers across all cities described growing demand for rental and utility assistance, transportation, and case management, particularly for low-income renters, seniors, households transitioning from homelessness, and single adults without children.

The absence of family shelters in Loveland and limited emergency shelter options or vouchers in Estes Park were identified as gaps in homeless services. Stakeholders in Estes Park noted that geography and transportation barriers make it difficult for residents to access county or regional services and that many people rely on local volunteer networks or partner agencies to travel.

Despite these challenges, participants highlighted several models of effective service delivery. A mobile home council in Fort Collins (Mi Voz) brings together resident leaders with legal and community partners and was praised as a strong example of empowerment and collaboration. Similarly, Loveland's Safe Lot program, which rotates among church parking lots, was cited as a creative model that combines case management with community support. A stakeholder said the safe lots were largely embraced, as neighbors were happy to see abandoned vacant lots that used to attract nefarious behavior now replaced with community resources and oversight. Schools, nonprofits, and faith-based organizations play an essential role in connecting residents to assistance and often fill the gaps left by limited government resources.

Collaboration and regional coordination. Collaboration emerged as both a strength and an opportunity for improvement. Locally, partnerships among nonprofits, churches, schools, and city staff were described as highly effective in addressing immediate needs.

Examples of successful collaboration included the Loveland Safe Lot leadership steering committee that coordinates across agencies to solve practical barriers for participants. One woman on the waiting list for a spot in the Safe Lot could not get her car registered to meet Safe Lot requirements because it needed emissions-related repairs. The Committee partnered with Loveland's House of Neighborly Service (HNS) to receive a car repair grant. Together, Loveland Safe Lot and HNS facilitated the repairs, enabling her to pass emissions, register her car, and access new income opportunities like DoorDash. In Fort Collins, partnerships between Mi Voz, a mobile home advocacy organization part of La Familia, and the city's Department of Housing and Community Vitality have facilitated resource fairs for mobile home residents once a month. These fairs bring together legal aid, rent and utility resources, and information about city programs that fund repairs for mobile homes. These examples demonstrate how strong local collaboration can mitigate limited resources

At the regional level, stakeholders recognized progress in coordination but saw room for improvement. Service providers and housing authorities expressed a desire for more consistent collaboration across city boundaries, particularly in sharing data on housing needs and coordinating development pipelines to ensure balanced affordability across the county. Estes Park stakeholders emphasized the need for stronger, more reliable county-level engagement noting that turnover among liaisons and limited presence in mountain communities can leave local organizations and residents without critical support.

There was broad agreement that regional bodies such as the NoCo Foundation and the Northern Front Range Metropolitan Planning Organization (NFRMPO) could play a greater role in aligning housing goals, data sharing, and coordination of funding strategies.

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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

Stakeholder recommendations. Stakeholders offered a range of solutions to strengthen housing stability and expand affordability across Larimer County. Recommendations included:

- Expand deeply affordable rental options by increasing public funding for gap financing, creating developer incentives, and leveraging partnerships to build units targeting households below 50% to 60% AMI.
- Preserve naturally occurring affordable housing through acquisition and rehabilitation programs that prevent displacement and maintain long-term affordability. New state legislation giving municipalities first right of offer on aging multifamily could create opportunities for preservation of naturally occurring affordable rental housing.
- Update zoning and development policies to allow higher density, encourage mixed-income projects, and streamline permitting processes across the region to reduce costs. (Note: Fast-track permitting for affordable projects has already been implemented in Larimer County and is in process in both Loveland and Fort Collins).
- Increase flexibility in assistance programs and housing programs to accommodate seasonal or fluctuating incomes.
- Create targeted funding and flexible assistance programs to bridge short-term financial needs for residents, such as deposits, utilities, or car repairs that prevent households from securing or retaining housing.
- Enhance service accessibility by expanding case management capacity, extending service hours, improving transportation links, and providing multilingual support.
- Exploring property tax abatement for nonprofit developers without the need to form limited special partnership with housing authorities.
- Strengthen emergency and transitional housing options, especially in Loveland and Estes Park, to address short-term housing crises.
- Improve regional coordination among cities, counties, and nonprofit partners through shared planning frameworks, data systems, and consistent communication.

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SECTION VI. COMMUNITY ENGAGEMENT SUMMARY

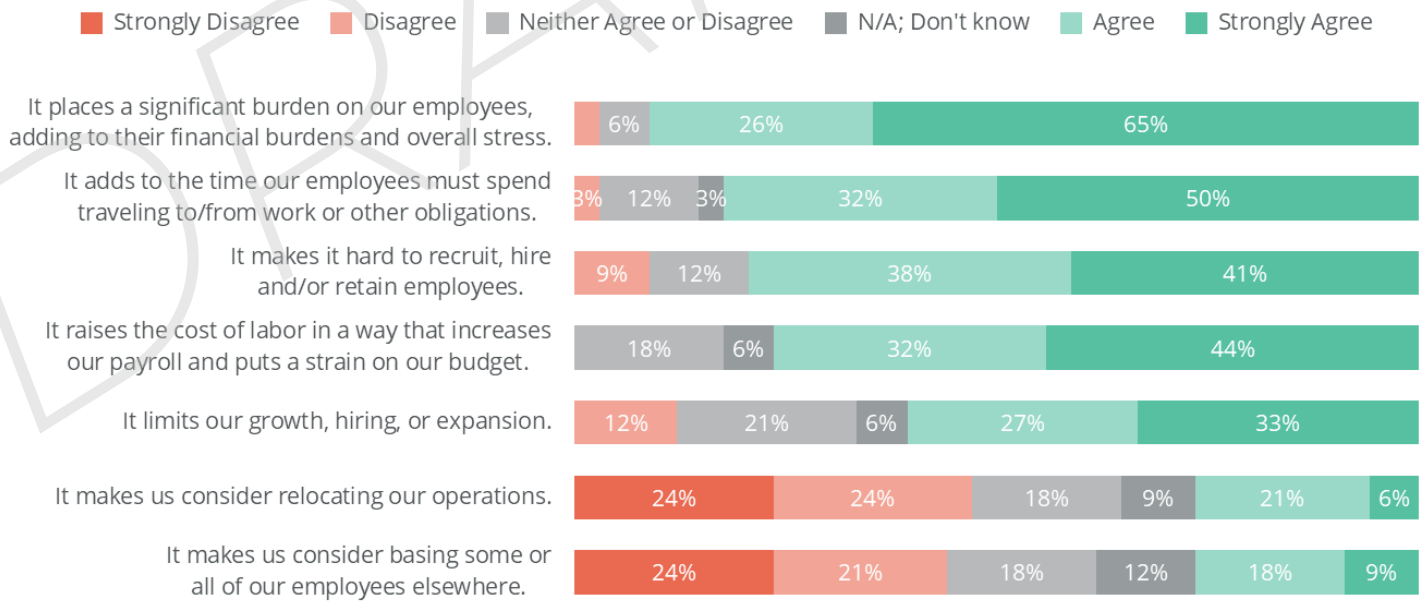
EMPLOYER SURVEY

An employer survey was distributed through local business organizations, chambers of commerce, and economic development entities throughout Larimer County. The survey received 43 responses. Most were small or mid-size businesses: 19% had 1-10 employees, 37% had 11 to 50 employees, and 16% had 101 to 1,000 employees.

Business stability. The survey started with questions related to business stability. Forty-five percent of respondents rent the space in which their business was located. Of those that lease space, 39% reported they had trouble covering rent payments in the last year. In explaining changes to their customer base in the past five years, some employers expressed they were benefitting from population growth in the region with more customers, while others citing shifting customer base to newer less loyal customers or higher income customers.

Impact of housing costs. Figure VI-6 shows employers' perception of the impact of housing challenges on their business and employees. There was overwhelming agreement among employers that housing cost and availability "places a significant burden on employees, adding to their financial burdens and overall stress" (91% agreed); and adds commute time (82% agreed). About three quarters of employers said it makes it hard to recruit or retain staff (79%) and raises the cost of labor (76%). Despite these challenges, employers indicated they are not likely to relocate or base employees elsewhere as a result.

Figure VI-6.
Level of Agreement on Business Impact of Cost and Availability of Housing in Larimer County



Note:
n = 34.

Source:
2025 Larimer County Employer Survey.

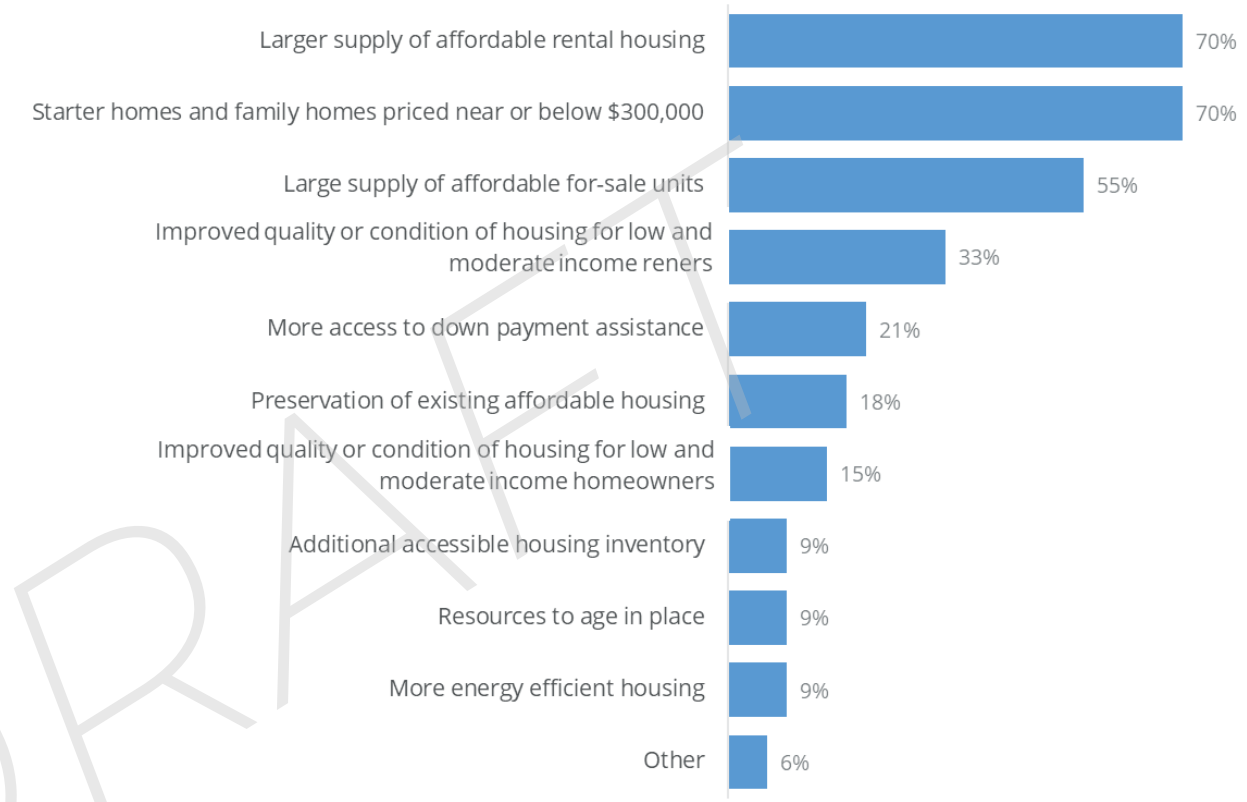
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Priority outcomes. Employers identified priority housing outcomes that would benefit their employees and communities. The most common responses were a larger supply of affordable rental housing and more starter homes and family homes priced near or below $300,000. Additional context from open-ended answers included:

- *"First and month last month of a security deposit and application fees for rentals are more than my retail employees can afford. Something to ease that part of the process for renters would be helpful."*
- *"I would love a program to support me to 'condominiumize' my rental units and allow them to become owners. I have tenants who have been with me for 8-10 years and would love them to be able to own something they could pass along. I'd be willing to do owner carry loans in many of these instances."*

Figure VI-7. Employers Survey Priority Housing Outcomes



Note: n = 33.

Source: 2025 Larimer County Employer Survey.

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RESIDENT FOCUS GROUPS

Mobile home residents. Maintaining aging units, keeping up with rising lot rents, and purchasing homes outright has become increasingly difficult, threatening the stability that mobile homes once represented for residents.

Nine residents from five different mobile home parks participated in a focus group to share their experiences. The following themes emerged from the discussion:

- Rising lot rents and fees are eroding the affordability;
- Persistent infrastructure and maintenance problems create financial and safety burdens for residents;
- Management issues, including poor communication, inconsistent rule enforcement, and limited accountability, undermine trust and quality of life in the mobile home community;
- Housing stability is fragile as residents fear eviction and struggle to balance essential expenses;
- Limited oversight and enforcement allow inequitable management practices to continue;
- Repair assistance and rehabilitation programs are valued but underfunded and restrictive; and
- Residents take pride in their mobile home and desire continued partnership with local governments and enhanced collaboration with Larimer County to improve conditions.

These themes are expanded in the subsections that follow.

Affordability concerns. For many participants, purchasing a mobile home initially provided stability through homeownership, but that stability has eroded due to steep increases in lot rent and new fees tied to pets, lot type, unit size, and household composition. Participants reported monthly lot rents around $1,100, with annual increases of $50 to $100. One resident shared that their lot rent was $250 when they moved into their home in 1998 and is $1,100 today.

These sharp increases have made residents deeply concerned about their long-term housing stability. Those on fixed incomes, including one older adult, felt especially vulnerable. Residents also questioned where lot rent increases were going, noting that community amenities did not seem to improve alongside higher costs. Many advocated for greater transparency from property managers about how rent revenue is used.

Additional fees for pets and chickens, adult children (required to be classified as full time residents) felt arbitrary and inconsistently applied, leading to some residents hiding pets or additional household members. Despite financial strain, residents continued to view mobile homeownership as offering better value and independence than conventional rental housing.

Infrastructure and maintenance. Widespread infrastructure issues added to residents' frustrations. Common problems included sewage backups, water leaks, tree root damage, and outdated plumbing. One resident reported that eight trailers in her park experienced sewage backups within just 45 days. Older mobile homes were said to deteriorate quickly, with issues like foundation shifting and sinkholes undermining safety and long-term habitability.

Residents struggled to find compatible replacement parts for older units at mainstream hardware stores, and responsibility for repairs was often unclear. In many cases, homeowners paid for repairs to park

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infrastructure out of pocket when management failed to respond. In instances when management did not respond and they could not find a needed part to complete the repair, their unit continued to deteriorate.

Park management and accountability. Concerns about park management were among the most frequent and intense themes. A lack of clarity about maintenance responsibilities has fueled distrust and frustration between property management and residents. Participants described frequent management turnover, favoritism in rule enforcement, and poor communication. Some reported being treated unfairly or even threatened with eviction for raising complaints. Others said that during management transitions, which were rarely communicated to residents, they had no one to contact to address problems.

Residents agreed that the most effective managers communicate openly, apply rules consistently, and understand state regulations. Unequal rule enforcement, they said, compromises safety and livability. For example, when parking limits are ignored, streets become congested, making trash and snow removal difficult.

Housing stability and eviction concerns. Rising costs and inconsistent management practices have made residents fearful of eviction. Several said that tenants were evicted for minor infractions or personal disagreements with management. Because mobile homes are expensive and difficult to move, residents feel trapped. They made clear that despite working, their wages did not meet their financial obligations. Those with household members in construction reported that their work hours have been significantly reduced. Some residents reported skipping food or medications to cover rising housing costs, underscoring the intense financial strain they face in balancing rent, maintenance, and everyday needs.

Resident recommendations. Participants shared several recommendations for local governments and policymakers:

- **Strengthen enforcement of management practices.** Residents said that weak enforcement of existing mobile home regulations allows poor management to persist, especially in unincorporated Larimer County. While the 2024 Mobile Homes in Mobile Home Parks Act[1] clarified owner responsibilities, residents felt it lacked impact without consistent oversight. They urged stronger city and county enforcement and meaningful consequences for violations.
- **Expand home repair and rehabilitation grants.** Some residents successfully used city repair grants for essential maintenance on skirting, plumbing, and water heaters, but expressed frustration with one-time limits, restrictive income eligibility, and insufficient funding. Demand for these grants far exceeded supply—there were 100 applicants for 25 awards. Some said they just need a new unit entirely and that repairs were not a sustainable solution to improve the quality of their home. Participants suggested that Larimer County expand support for repair and replacement programs, particularly for unincorporated areas.
- **Support structural improvement to extend mobile home lifespan.** Residents suggested policy or construction requirements for structural reinforcements, such as central support beams or helical piers, to improve stability and prevent splitting or shifting.
- **Continue outreach and community engagement.** Several participants said they learned about valuable programs and

[1] HB24-1294 (2024) includes provisions that prohibit landlords from issuing rent increases if they have not fully complied with any government order or have been found by the Division of Housing or court to have violated the Act and requires notices, leases, and contracts to be provided in both English and Spanish.

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resources through city-hosted resource fairs and wanted those efforts to continue. One resident said they felt they were receiving the most support they ever had from the City of Fort Collins and wanted to see more outreach for communities in unincorporated Larimer County.

Mountain, rural, and agricultural area residents. Two different groups highlighted needs in unincorporated, mountain and rural areas: one with residents living near Red Feather Lakes, and one with members of the Larimer County Agricultural Advisory Board. Key issues for residents in Red Feather were infrastructure (especially water) challenges, accessibility needs (and supports for aging in place), as well as more housing diversity—more types of housing and more rental units for local workforce. Many of these themes were echoed by the Agricultural Advisory Board, who said availability and affordability of housing in rural areas are the most pressing issues, forcing many workers and employers to look to Weld County or beyond for housing.

The Agricultural Advisory Board described how housing challenges are constraining both producers and workers across Larimer County. Producers who want to build on-site workforce housing face complex and expensive permitting processes and said a liaison or technical expert would help them navigate regulations. Participants also pointed to barriers under federal H-2A (temporary agricultural worker visa) rules, which prohibit seasonal workers from living in unapproved trailers or modular units and require that employer-provided housing meet strict inspection standards set by the U.S. Department of Labor and the Colorado Department of Agriculture. While these rules ensure safety, they make it difficult for small farms to offer flexible housing options.

When discussing trends, many said the local housing market has worsened in recent years, with rising land prices, expensive code requirements, and limited new construction. They noticed multifamily and higher density developments had grown in parts of the county, but new developments were still unaffordable for most agricultural workers. Some landowners are exploring accessory dwelling units or subdividing property to offset farm expenses, but overall, participants agree that housing costs remain the single biggest barrier to attracting and retaining agricultural labor.

Residents of rural and mountain areas are often disproportionately older residents living in older structures relative to urbanized areas. Focus group participants expressed a strong desire to age in their community but acknowledged there is a need for accessibility improvements and/or smaller more manageable housing types. Many older residents feel "house rich and cash poor" as they remain in homes larger than they need with rising property taxes, but with no good options for downsizing. Residents were very glad to learn about recent zoning changes that would allow for an easier pathway for ADU construction and duplex options in their community. There was an evident disconnect between resident perception of barriers and recent code changes in the county, which highlighted an opportunity for improved education about housing options as well as services.

Infrastructure is another key challenge in these areas. Several residents described community wells running dry, difficulty in obtaining state permits for new wells, and added expense of transporting water to recharge the well. Programs or support for these and similar issues could improve housing conditions and affordability in rural areas.

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People experiencing homelessness. A resident focus group was held at the Murphy Center for Hope, he hub of resources and a day shelter for people experiencing homelessness in Fort Collins. Participants represented a range of circumstances that commonly precede or prolong homelessness, including medical crises, employment disruptions, family instability, and difficulty re-entering the workforce after injury or incarceration. Their experiences illustrate how relatively small disruptions can lead to long-term housing instability in the absence of effective supports, and how system gaps contribute to individuals remaining homeless longer than necessary.

Housing access and system navigation. Participants consistently reported challenges understanding and progressing through the housing assessment and voucher process, starting with the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT). The VI-SPDAT is a crucial assessment and process that keeps individuals on appropriate waiting lists for housing programs that best meet their needs, such as shorter term Rapid-Rehousing assistance, or longer term Permanent Supportive Housing assistance. Many encounter this assessment when they first seek housing navigation assistance, but one participant pointed out that navigators are not clear about the assessment's purpose, scoring system, and follow-up requirements. As a result, individuals often fail to complete regular check-ins or gather necessary documentation that helps them more effectively be placed in housing. These gaps in communication prolong times spent in shelters or unsheltered conditions and reduce the efficiency of local housing programs.

Documentation requirements, such as income verification, medical paperwork, and identification, were widely cited as barriers. For individuals without stable storage or transportation, meeting these requirements is difficult without targeted and predictable assistance.

Several participants described receiving shifting or inconsistent timelines for when housing support might be available. They felt that staff were not being transparent about simply not having a unit available for them and felt like they were bouncing between agencies to be placated, instead of actively being helped.

Barriers to shelter access. Participants described significant limitations within the existing shelter system, particularly for women and individuals with behavioral health or medical needs. One participant shared that she was banned from the only shelter for women in Fort Collins and now sleeps outside. All other options require sobriety, but she has not been able to access a rehabilitation center. Sleeping on the street has only made her drug addiction more severe and she feels extremely vulnerable sleeping outside. Another woman in the focus group, who recently had a stroke, sleeps outside by her to keep her company, even though she can still access the women's shelter. Other participants also noted that prior low-barrier options have become more restrictive and that almost all low-barrier options are only available to single men.

Participants also noted that individuals managing chronic health conditions, such as diabetes or kidney diseases, face heightened risks when unsheltered due to inability to safely store medication or maintain treatment routines. They felt people with chronic conditions should be immediately placed in housing, or at the very least, receive priority for shelter beds.

Informal community supports. Despite barriers within formal shelter, housing, and service systems, participants emphasized that people experiencing homelessness often support one another in meaningful ways. Peer networks provide information (like when and how often to check-in for a VI-SPDAT assessment), safety, and companionship, especially for those sleeping outdoors. These

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relationships were described as essential, though participants also acknowledged that not everyone is able to accept help due to personal, behavioral, or health challenges. These informal networks supplement overextended service systems.

Services needed to support housing stability. Participants identified supports that would help people stabilize once housed and prevent episodic experiences of homelessness:

- Streamlined and predictable case management with manageable caseloads;
- Expanded harm reduction services that prevent disease and connect active drug users to rehabilitation options;
- More accessible rental and utility assistance programs to prevent evictions and service shutoffs;
- Improved communication regarding available shelter and housing resources; and
- Workforce development opportunities designed for individuals reentering the labor market.

Policy considerations and recommendations. Participants emphasized the need for additional housing vouchers and clearer, more efficient processes for navigating the housing system. Increasing vouchers and strengthening navigation capacity would shorten individual time spent experiencing homelessness. Participants would like local jurisdictions and homelessness service providers to consider:

- **Increasing staffing for navigation and outreach** to improve responsiveness and reduce administrative bottlenecks;
- **Providing transparent and consistent information** about assessment criteria, timelines, and voucher availability;
- **Ensuring equitable, standardized practices across shelter providers** to reduce conflicts, eligibility concerns, and improve overall system performance; and
- **Prioritizing funding for stable housing placements** as the most effective way to shorten and end cycles of homelessness.

Families receiving rental and housing navigation support. Four participants who received financial assistance and housing navigation support from Neighbor To Neighbor participated in a focus group. Participants included a single parent, individuals with disabilities and chronic health conditions, and caregivers for adult children with disabilities. Two participants had recently exited homelessness while the others had been living in their current rental for more than 10 years.

Participants shared experiences navigating housing instability driven by rising rents, health challenges, caregiving responsibilities, job loss, and tight rental markets, and described the role housing support and navigation programs played in helping them achieve stability.

Reasons for initial instability. Participants described housing instability as a result of coinciding economic, health, and family-related challenges. Rising rents, utilities, and repair costs caused participants to sell homes and fall behind on rent. Job loss related to childcare responsibilities made it difficult to maintain consistent income in the case of a single parent. Another parent caring for an adult child with a disability also had to leave her job after her child aged out of public school. Relationship breakdowns and family disruptions also contributed to sudden instability. Several participants reported

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landlord-related issues, including past unexpected lease non-renewals and inappropriate or unsafe behavior.

Some experienced homelessness because of these factors, including living in vehicles, couch surfing, or staying in hotels or shelters. Participants said this experience was highly stressful and destabilizing, with lasting impacts on their financial security and well-being.

Participants shared scenarios that led them to seek assistance:

- *One person shared that she lost her home after living there for 20 years. She could no longer afford repair costs.*
- *Another shared that they fell behind on rent and her landlord asked her to do illegal things to avoid being evicted.*
- *One participant left Longmont after his relationship with his ex-wife deteriorated. He is now the sole provider for his 3 and a half year old and could not find childcare that accommodated his hours working as a chef, so he had to quit his job. After staying in a hotel for four months, he found affordable housing in Fort Collins through Neighbor To Neighbor housing support.*
- *One participant shared that after her son left for the military, paying for housing on a single income has become unaffordable and she needs to downsize to something more manageable.*

Pathways to current housing. Participants accessed their current housing through a combination of housing navigation services, rental assistance, vouchers, and existing family financial support. Neighbor to Neighbor, Family Promise, and local housing authorities played a central role in helping participants identify available units, communicate with landlords, and navigate application processes. For several participants, Housing Choice Vouchers made it possible to exit homelessness or remain housed during periods of unemployment or medical crisis.

Participants emphasized that without direct assistance from navigators, they would not have been able to secure housing on their own. Navigators were described as persistent, responsive, and willing to help in complex and challenging situations.

Stability and predictability were the most valued aspects of participants current housing situation (after access to services/affordable housing). Parents emphasized the importance of housing that supports their children's well-being.

Needed services and gaps. Participants identified several supports that they found insufficient or difficult to access:

- **Utility, internet, and basic needs.** Utility assistance was a major need, particularly in winter months. Some participants receive LEAP, but described application challenges, errors, and gaps in coverage.
- **Employment and childcare.** Parents described difficulty finding jobs that pay enough to cover rent and that can accommodate childcare schedules.
- **Healthcare and transportation.** Participants with chronic health conditions or disabilities described difficulties getting to and from medical appointments and finding specialized care.
- **More variety in available affordable housing**, such as a smaller and more accessible home for older adults and people with disabilities and more outdoor space for families with children.

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Recommendations. Based on experiences, participants offered the following recommendations:

- **Continue housing navigation and stabilization services.** Participants receiving navigation support through Neighbor To Neighbor were notified by their caseworker that the program was winding down. While this does not impact their situation, they emphasized that housing navigation was vital to their new-found stability.
- **Increase housing options for older adults and people with disabilities.** Participants would like to see more age-appropriate communities that would improve their quality of life and sustain their sense of belonging, especially after exiting homelessness. For those with disabilities or children with disabilities, they felt it was difficult to find accessible housing with a voucher.
- **Ensure support for all single parents.** One participant described difficulty finding and receiving assistance as a single father, despite seeing options for single mothers. He felt lucky that he was connected to dedicated staff at Family Promise and Neighbor to Neighbor and hoped services could be more consistently extended to all single parents.
- **Market existing workforce development and support programs.** Throughout the focus group, participants helped each other learn about existing services that worked for them and how to apply. Many were introduced to programs they had not heard about before, such as Fort Collins' free CDL training for bus driver applicants and internet assistance program. They hoped that Fort Collins, Loveland, and Larimer County would perform more outreach about existing programs that can help individuals achieve higher wages and housing stability.

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SECTION VII. RESIDENT SURVEY ANALYSIS

This section outlines results from the 2025 Larimer County Resident Housing Survey. The analysis begins with an evaluation of current housing choice and needs, then pans outward toward community views, future housing choices, in-commuter choices, and opinions on housing policies and solutions. There were 1,146 total respondents in the Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

PRIMARY FINDINGS

Current housing situation

- Affordability is a primary driver of housing choice, with 79% of respondents selecting their current home because of cost. Safety, bedrooms, and housing quality were secondary considerations.
- Precariously housed respondents, those living with friends or family but not on the lease, reported the highest rates of poor or fair housing conditions (38%), followed by single parents (35%), and mobile home occupants (25%).
- Nineteen percent of respondents with a disability or a household member with a disability reported that their home does not meet accessibility needs. The most commonly needed features were ramps and bathroom grab bars.

Housing stability and displacement

- Sixteen percent of respondents experienced displacement in Larimer County within the past five years. Displacement rates were highest among renters, single parents with children, those living in subsidized housing, and precariously housed.
- Rental increases were the most common cause of displacement (35%). Respondents outside Loveland and Fort Collins were more likely to cite landlords selling rental units and also reported higher rates of displacement due to conflict with a partner and HOA fees.

Future housing choice

- Forty-three percent of respondents wanted to move within the next three years. The most common reasons included needing a different-sized home or yard (53%), renting and wanting to own (46%), seeking more affordable housing (34%), wanting to move to a different neighborhood (23%), and other reasons (19%).
- Among renters, 77% cited inability to afford a down payment as a barrier to homeownership. Additional concerns included affording mortgage payments and fees (68%), inability to afford homes near work or preferred schools (45%), excessive debt (37%), and home insurance costs (26%).
- When asked about interest in a renter-to-homeownership support program, 69% of renters said they would be interested.

Work and commute

- Thirty-two percent of commuters did not consider living where they work, most often because they did not feel it was important to live in the same community or they preferred a more rural environment.
- The remaining 68% did consider living where they work—of these respondents, 57% reported they could not find an affordable home to purchase in the same city they worked.

Housing solutions and policy input

- Respondents rated "housing affordable to public service and retail workers" with the highest importance level (countywide, as well as in Fort Collins and Loveland). Respondents living elsewhere in Larimer County rated starter homes for first-time buyers as the most important.
- Residents broadly indicated that duplexes, townhomes, and accessory dwelling units (ADUs) were "appropriate in my neighborhood" but respondents were more hesitant about higher-density development in their neighborhoods.
- To increase affordability, 60% of respondents said they would support allowing duplexes or townhomes in their neighborhood, and 59% supported higher property taxes on high-value homes.

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SECTION VII. RESIDENT SURVEY ANALYSIS

- Respondents identified resources that would help them feel more secure in their current housing, most commonly help finding an affordable home (27%), assistance with a down payment (19%), help obtaining a home loan (15%), funds for critical repairs (14%), and rental assistance (13%).

METHODOLOGY

The Larimer County Resident Housing Survey was an online survey with a "snowball" sample, in which respondents were asked to share the survey amongst friends, family, and peers living in Larimer County. As such, the survey respondents do not represent a "random sample" of the regional population. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample. Even so, the demographic profile of survey respondents is very similar to County residents overall (see survey demographics section).

When considering the experience of members of certain groups within jurisdictions, some sample sizes are too small (n<40 respondents) to express results quantitatively. In these cases, we describe the survey findings as representative of those who responded to the survey, but that the magnitude of the estimate may vary significantly in the overall population (i.e., large margin of error). Survey data from small samples are suggestive of an experience or preference, rather than conclusive.

Promotion. The survey was promoted in English and Spanish using:

- Social media posts on City and County accounts on Nextdoor, Facebook, Instagram, and X (mid-September to mid-November);
- Notification of resident survey to local media outlets;
- Pop-up advertisements for visitors of City and County websites;
- Landing page on Larimer County's website advertising the resident survey, community events, and updates on the HNA;
- Flyers in high-visibility areas throughout Larimer County, including libraries, recreation centers, senior centers, and within subsidized housing complexes;
- Advertisements within newsletters for various social service providers and community organizations, including local housing authorities; and
- Promotion during other engagement events, including community meetings held in Fort Collins and Loveland, resident focus groups, and stakeholder focus groups.

Geographic note. Throughout this section, survey data is broken down by the jurisdiction in which the respondent lives. Residents within the "Elsewhere in Larimer County" category represent those who selected Berthoud, Estes Park, Laporte, Timnath, Wellington, Windsor, Unincorporated Larimer County, or somewhere else in Larimer County. People who work in Larimer County but do not live in Larimer County are included in the "Work and Commutes" section that seeks to understand in-commuter choices, but not included in Larimer County total.

Explanation of terms:

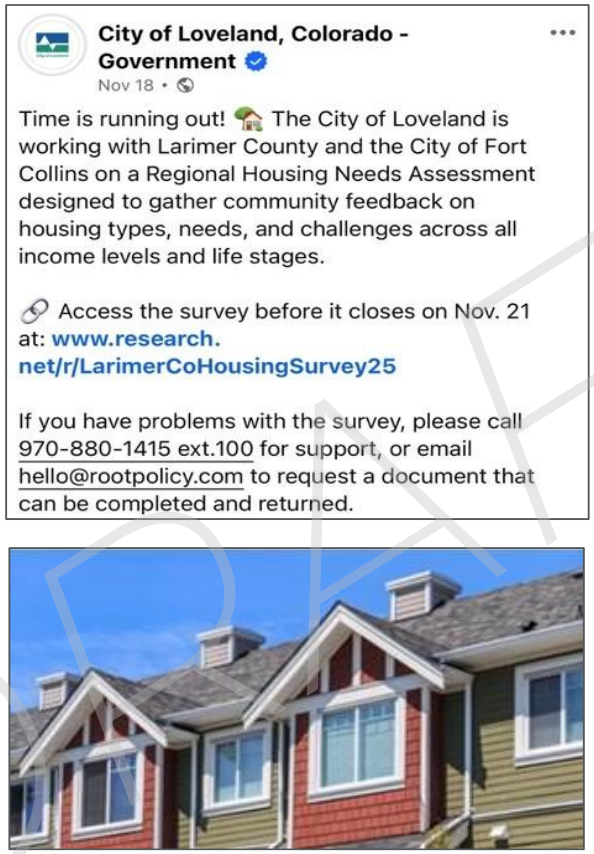
- "Precariously housed" includes residents who are currently homeless, living in transitional or temporary/emergency housing, or are staying with friends or family temporarily and not on the lease or property title.
- "Subsidized housing" refers to a respondent whose household's housing costs are subsidized by a housing voucher (e.g., Section 8/Housing Choice Voucher), public housing, LIHTC, project-based Section 8, deed-restricted ownership products, and any other place-based housing subsidies.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Figure VII-1.
Example Website and Social Media Promotion







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SECTION VII. RESIDENT SURVEY ANALYSIS

SURVEY DEMOGRAPHICS

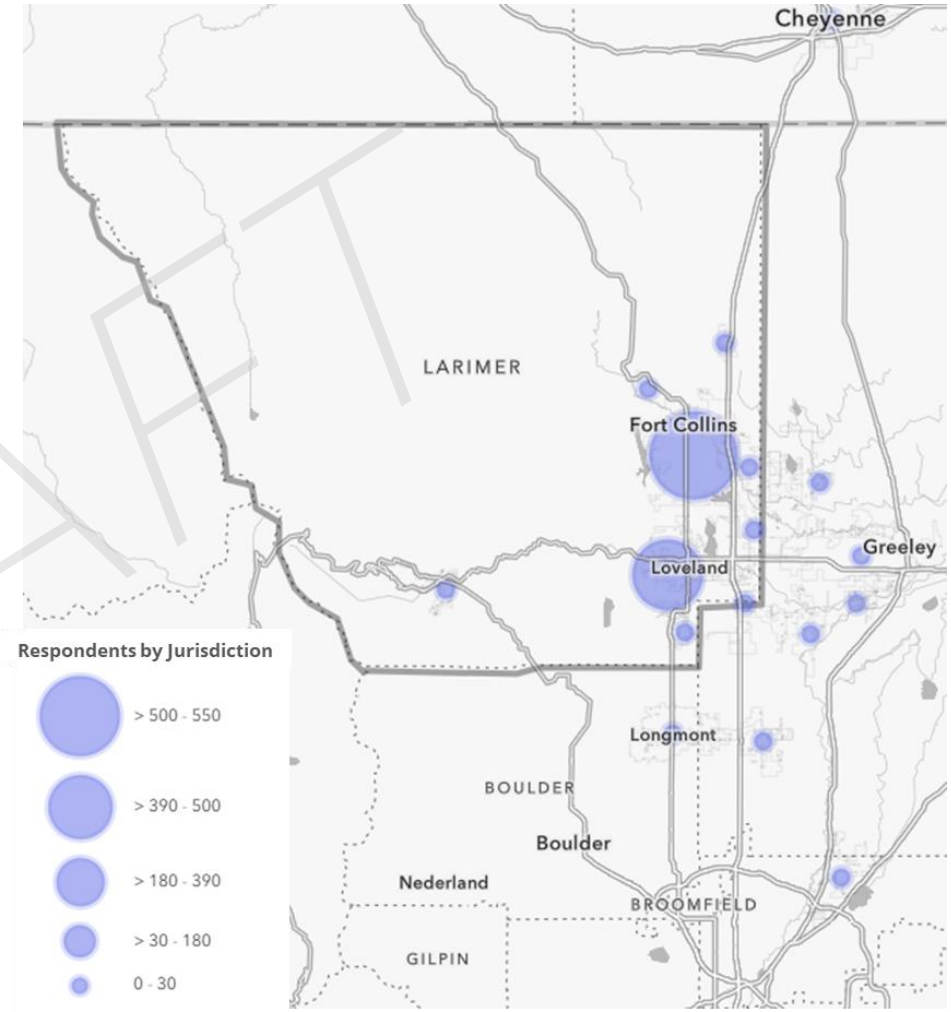
There were 1,146 total respondents to the Larimer County Resident Housing Survey. Almost half (47%) of respondents lived in Fort Collins—proportional to the share of the county's population living in Fort Collins—and 42% lived in Loveland—a proportion higher than its share of the county population. Nine percent of survey respondents lived elsewhere in Larimer County and 2% were in-commuters to Larimer County. Figure VII-2 maps respondents by the jurisdiction in which they live.

The demographic profile of survey respondents is similar to data for the county overall (See Section I for comparable demographic data):

- 63% of respondents were homeowners (compared to a 64% homeownership rate in Larimer County).
- 76% respondents were non-Hispanic White (the same as the proportion of the county population that identifies as non-Hispanic white). Another 8% of respondents identified as Hispanic, 4% who were mixed or multiracial, and 12% who identified as another race not listed.
- Among survey respondents, 22% of reported incomes below $50,000, 32% $50,000 to $100,000, 22% $100,000 to $150,000 and 25% reported incomes over $150,000. According to ACS data, in Larimer County, the actual proportions are 27%, 29%, 20%, and 25%--very close to survey respondent incomes.

Figure VII-3 displays the demographics of respondents by jurisdiction.

Figure VII-2.
Map of Respondents by Jurisdiction



Note: n = 1,146.; Does not place responses from unspecified unincorporated Larimer County. Responses outside Larimer County were designated as in-commuters

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Figure VII-3.
Resident Survey Sample Sizes by Jurisdiction and Selected Characteristics

	All Respondents		Fort Collins		Loveland		Elsewhere in Larimer County		In-Commuters	
	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Total Responses	**1,146**	**100%**	**543**	**47%**	**484**	**42%**	**100**	**9%**	**19**	**2%**
Tenure										
Homeowner	724	63%	302	56%	338	70%	72	72%	12	63%
Renter	346	30%	212	39%	111	23%	18	18%	5	26%
Precariously Housed	55	5%	21	4%	24	5%	8	8%	2	11%
Mobile Home Occupant	39	3%	25	5%	10	2%	4	4%	0	0%
Subsidized Housing	63	5%	36	7%	19	4%	7	7%	1	5%
Race and Ethnicity										
Non-Hispanic White	639	76%	323	79%	261	75%	47	68%	8	57%
Hispanic	64	8%	26	6%	24	7%	8	12%	6	43%
Mixed / Multiracial	37	4%	17	4%	17	5%	3	4%	0	0%
Other	102	12%	44	11%	47	13%	11	16%	0	0%
Household Income										
Less than $50,000	177	22%	91	23%	72	21%	11	16%	3	20%
$50,000 to $74,999	132	16%	61	15%	61	18%	8	12%	2	13%
$75,000 to $99,999	129	16%	56	14%	59	18%	13	19%	1	7%
$100,000 to $149,999	177	22%	85	21%	73	22%	15	22%	4	27%
Over $150,000	201	25%	105	26%	71	21%	20	30%	5	33%

Note:

n = 1,146. Numbers do not aggregate either due to multiple response or because respondents did not choose to provide a response to all demographic and socioeconomic questions. In-commuters reside outside of Larimer County.

Source:

Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

CURRENT HOUSING SITUATION

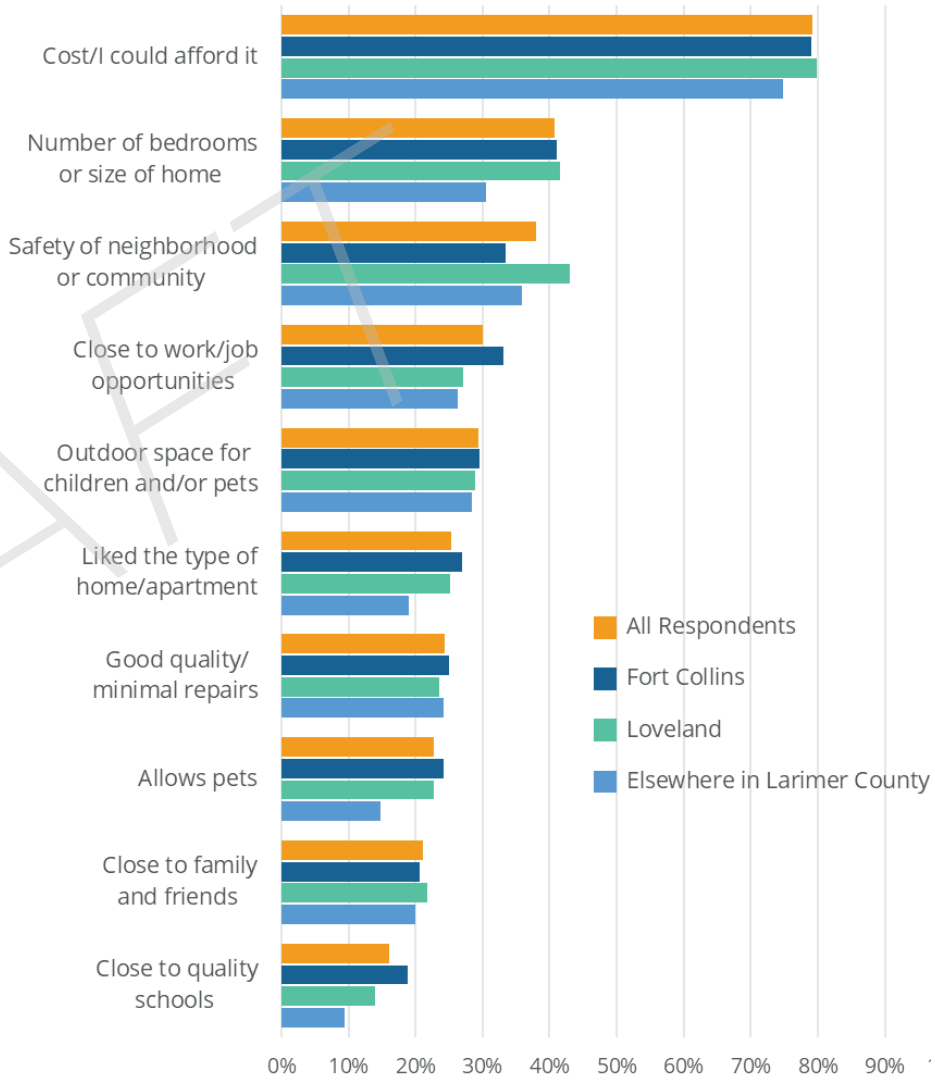
Housing choice. The survey began with questions to assess reasons why respondents are in their current home or housing situation. Cost and affordability were the most common answers across jurisdictions, followed by the number of bedrooms and size of home, safety of neighborhood and community, proximity to work or job opportunities, and outdoor space for children and pets.

As shown in Figure VII-4, selection rates by jurisdiction are mostly consistent, though Loveland had a slightly higher rate of respondents who selected "safety of neighborhood and community" as a reason for choosing their current home.

Reasons for choosing a home varied by tenure and household type, as shown in Figure VII-5 on the following page. Though all groups rated cost/affordability highest, other variations included:

- Mobile home occupants, precariously housed respondents, and respondents in subsidized housing were more likely than other groups to say needing a place quickly was a factor in choosing their current home.
- Homeowners were more likely than other tenure groups (renters, mobile home occupants, and precariously housed) to say they prioritized safety of the neighborhood and community.
- Respondents with children were more likely than other household groups to select proximity to quality schools.
- Compared to couples with children, single parents were more likely to factor in their home's proximity to work.

Figure VII-4.
Factors in Choosing Current Home, by Jurisdiction



Note: n = 1,118

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Figure VII-5.
Top 5 Factors in Choosing Current Home or Apartment, Tenure and Household Type

Homeowner		
1	Cost/I could afford it	77%
2	Number of bedrooms/size of home	41%
3	Safety of neighborhood/community	40%
4	Outdoor space for children/ pets	33%
5	Good quality/ minimal repairs	28%

Renter		
1	Cost/I could afford it	84%
2	Allows pets	43%
3	Number of bedrooms/size of home	43%
4	Close to work/job opportunities	35%
5	Safety of neighborhood/community	34%

Mobile Home Occupant		
1	Cost/I could afford it	72%
2	Close to family and friends	31%
3	Number of bedrooms/size of home	22%
4	Allows pets	22%
5	Needed a place to live quickly	22%

Precariously Housed		
1	Cost/I could afford it	74%
2	Close to family and friends	40%
3	Needed a place to live quickly	36%
4	Allows pets	32%
5	Close to work/job opportunities	30%

Subsidized Housing		
1	Cost/I could afford it	76%
2	Allows pets	39%
3	Safety of neighborhood/community	34%
4	Number of bedrooms/size of home	32%
5	Needed a place to live quickly	31%

Couple with Children		
1	Cost/I could afford it	83%
2	Safety of neighborhood/community	54%
3	Number of bedrooms/size of home	49%
4	Outdoor space for children/ pets	46%
5	Close to quality schools	35%

Single Parent		
1	Cost/I could afford it	85%
2	Number of bedrooms/size of home	53%
3	Close to quality schools	50%
4	Safety of neighborhood/community	48%
5	Close to work/job opportunities	43%

Older Adult Household		
1	Cost/I could afford it	75%
2	Safety of neighborhood/community	37%
3	Number of bedrooms/size of home	36%
4	Liked the type of home/apartment	27%
5	Close to family and friends	24%

Disability		
1	Cost/I could afford it	77%
2	Number of bedrooms/size of home	40%
3	Safety of neighborhood/community	35%
4	Allows pets	34%
5	Outdoor space for children/ pets	29%

Note: n = 1,118.
Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

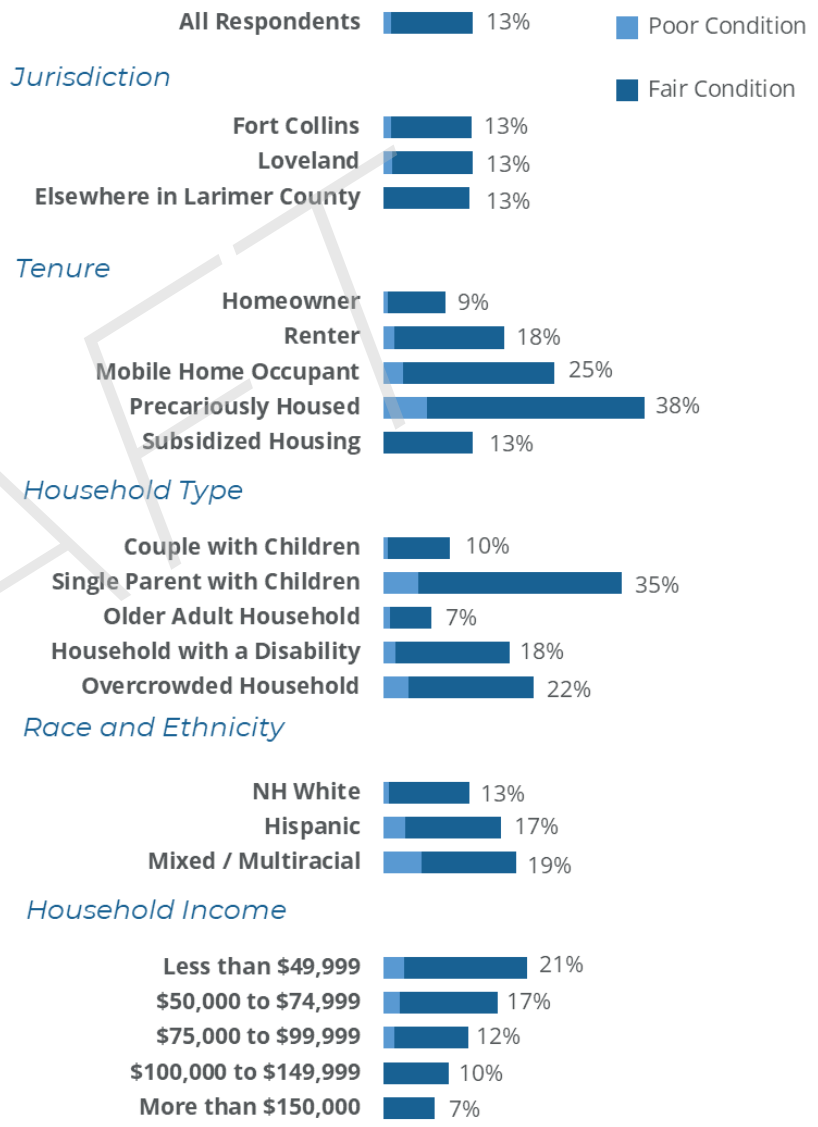
Housing condition. Responses to current housing choice showed that respondents across demographic groups prioritized cost factors more than quality or condition. The survey also asked respondents to evaluate their housing conditions to explore if quality concerns and repair needs are present. Figure VII-6 displays the combined percentage of respondents who rated their home in poor condition (defined as a home or apartment with major problems that are not healthy or safe) and in fair condition (defined as a home or apartment needs a lot of work):

- Precariously housed residents, mostly made up of those living with friends or family but not on the lease, reported the highest rate of poor or fair housing conditions (38%). Single parents had the next highest rate at 35%.
- Renters reported poor or fair housing conditions at double the rate of homeowners (18% compared to 9%). Mobile home occupants and precariously housed residents reported the highest rates of poor housing conditions out of all tenure groups; and
- Not surprisingly, condition ratings improved as income increased.

Half (50%) of respondents who needed improvements selected cosmetic upgrades as their most needed repair, followed by energy efficiency improvements (35%), weatherization (29%), window replacement (28%), and landscaping (27%). Figure VII-7 (on the next page) shows needed repairs by Jurisdiction, tenure, and income.

Forty-two percent of respondents who needed repairs said they have not been completed because they cannot afford to complete them. Thirty-nine percent of single parents and 21% of Hispanic residents in need of repairs reported they were worried that a repair request would lead to a rent increase or eviction—the highest of all demographic groups.

Figure VII-6. Poor and Fair Housing Condition Ratings



Note: n = 1,116.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Figure VII-7. Top Five Needed Repairs, by Jurisdiction, Tenure and Household Income

All Respondents		Fort Collins		Loveland		Elsewhere in Larimer County	
1 Cosmetic improvements	50%	1 Cosmetic improvements	49%	1 Cosmetic improvements	53%	1 Cosmetic improvements	45%
2 Energy efficiency	35%	2 Energy efficiency	39%	2 Energy efficiency	34%	2 Windows	33%
3 Weatherization	29%	3 Windows	31%	3 Weatherization	29%	3 Weatherization	26%
4 Windows	28%	4 Weatherization	30%	4 Landscaping	26%	4 Landscaping	26%
5 Landscaping	27%	5 Landscaping	28%	5 Windows	24%	5 Energy efficiency	22%

Homeowner		Renter		Mobile Home Occupant		Precariously Housed	
1 Cosmetic improvements	53%	1 Cosmetic improvements	47%	1 Windows	42%	1 Cosmetic improvements	53%
2 Energy efficiency	34%	2 Energy efficiency	38%	2 Cosmetic improvements	42%	2 Interior walls or ceilings	45%
3 Landscaping	33%	3 Weatherization	36%	3 Cooling system	35%	3 Energy efficiency	34%
4 Windows	31%	4 Interior walls/ceilings	29%	4 Plumbing	31%	4 Windows	32%
5 Weatherization	26%	5 Cooling system	24%	5 Energy efficiency	31%	5 Weatherization	24%

Income Less than $50,000		$50,000 to $74,999		$75,000 to $99,999		$100,000 to $149,999	
1 Energy efficiency	35%	1 Cosmetic improvements	46%	1 Cosmetic improvements	62%	1 Cosmetic improvements	65%
2 Cosmetic improvements	35%	2 Energy efficiency	41%	2 Landscaping	36%	2 Energy efficiency	31%
3 Windows	33%	3 Weatherization	36%	3 Energy efficiency	36%	3 Windows	29%
4 Weatherization	31%	4 Plumbing	30%	4 Weatherization	30%	4 Landscaping	27%
5 Interior walls or ceilings	24%	5 Landscaping	27%	5 Windows	25%	5 Weatherization	27%

Note: n = 651.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Accessibility Needs. In addition to housing conditions, an important element to housing stability for residents with disabilities is accessibility/adaptability of their home. Nineteen percent of respondents who reported they or someone in their household had a disability reported that their home does *not meet* their accessibility needs.

Households living "elsewhere in Larimer County" were the least likely to have homes meeting accessibility needs. By tenure, mobile home occupants and precariously housed residents reported their home did not meet accessibility needs at the highest rates (35% and 36%, respectively).

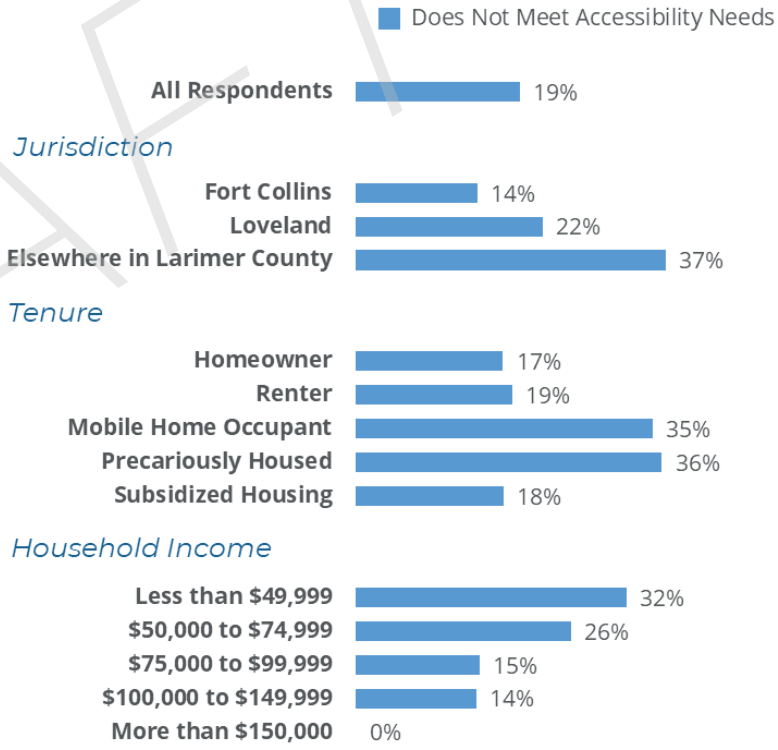
Forty-five percent of all respondents whose home did not meet accessibility needs reported the need for ramps, followed by grab bars in the bathroom (41%), wider doorways (33%), stair lifts (24%), and lower kitchen and bathroom counters (22%). The top needs for homeowners, renters, and mobile home occupants were ramps and grab bars in the bathroom. Half (50%) of precariously housed residents whose current residence did not meet accessibility needs reported that their service or emotional support animal was not allowed in the place they were currently staying in.

Other open-ended answers included:

- "I would benefit from a place without stairs." – *Renter in Fort Collins*
- "Step in shower." – *Homeowner in Loveland*
- "Handrails by front stairs." – *Homeowner in Loveland*
- "Modified shower and bottom floor apartment." – *Renter elsewhere in Larimer County*

Almost a quarter (23%) of all respondents with a disability reported that it was not likely at all that they would find a home in their community that met accessibility needs if they had to move and 46% said they are not able to afford housing with accessibility features that they need. Additionally, 35% worried about eviction or a rent increase if they requested an accommodation from their landlord.

Figure VII-8.
Does Your Home Meet Accessibility Needs?



Note: n = 309; Reflects respondents who indicated someone in their household has a disability.
Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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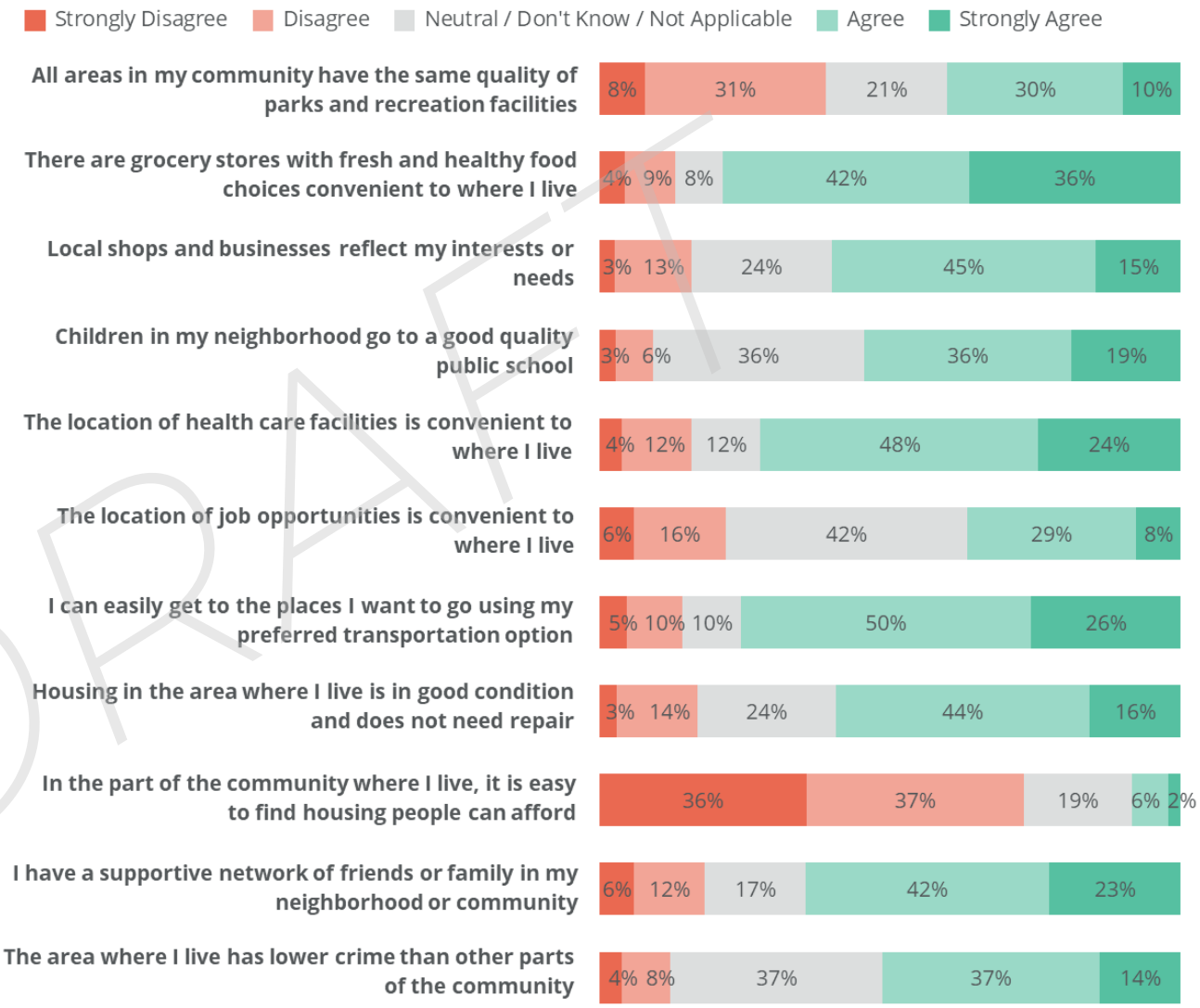
SECTION VII. RESIDENT SURVEY ANALYSIS

Neighborhood and Community. Sixty-eight percent of respondents agreed or strongly agreed that they feel welcome in all neighborhoods in their community, reflecting a strong sense of community ties and comfortability for residents across Larimer County.

There was variation between demographic groups, however: Single parents, respondents with a disability, Hispanic, and Mixed or Multiracial respondents had the highest rates of respondents who did not feel welcome in all neighborhoods of their community.

Figure VII-9 shows level of agreement on specific community and neighborhood quality items. Respondents agreed the most strongly that there are grocery stores close to where they live, that it is easy to get places using preferred transportation methods, locations of health care facilities are convenient, and that they have a supportive network of family and friends within their neighborhood. Respondents disagreed the most strongly that people can find housing they can afford in the community they live in.

Figure VII-9.
Level of Agreement on Community Items, All Respondents



Note: n = 881.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

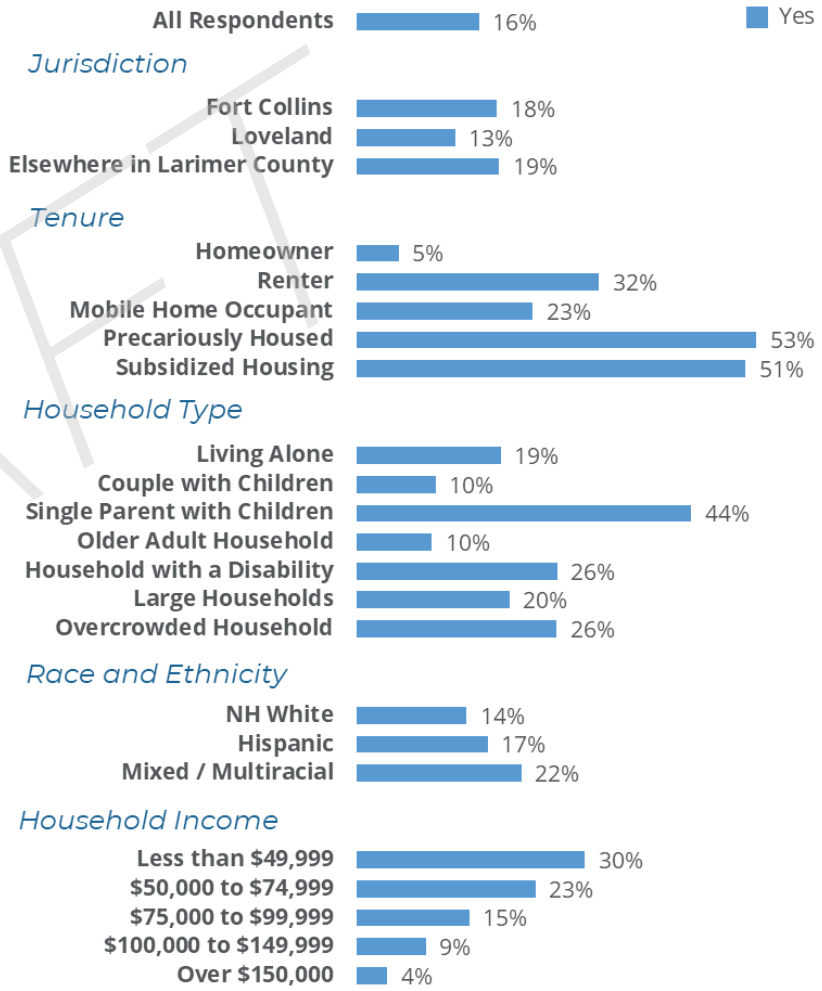
HOUSING STABILITY AND DISPLACEMENT

Sixteen percent of respondents reported they have experienced displacement, defined as having to move in the past five years when they did not want to. As shown in Figure VII-10, precariously housed respondents, respondents who now live in subsidized housing, and single parents had the highest rate of reported displacement from their previous housing situation. Hispanic and Multiracial respondents had higher displacement rates than non-Hispanic White respondents.

The top reason for displacement reported by respondents was rent increasing more than they could afford, followed by job loss or reduced hours that resulted in reduced wages (see Figure VII-11 on the next page). Open-ended responses from the "other" category included the following stories:

- "Rent increases were twice per year over the course of nine years under the same lease." – *Precariously Housed in Loveland*
- "Property manager cycled random roommates in and out without notification. One roommate made home feel unsafe." –*Fort Collins renter*
- "The landlord increased rent by 20% without warning despite us having been stellar tenants." – *Renter in Fort Collins*
- "Medical injury with loss of income." – *Renter in Loveland*
- "Property taxes increased too much. Landlord only increase rent to cover new property tax rate increase… He was going to make $1-200 per year more on a ~20% rent increase." –*Loveland resident*
- "Me mudé como 6 meses por que éramos muchos en la casa y no cabíamos, después me regresé otra vez por que vendieron la traila donde rentaba / I moved for about 6 months because there were many of us in the house and we didn't fit, then I came back again because they sold the trailer where I rented." – *Mobile Home Occupant in Fort Collins*

Figure VII-10. In the past 5 years, have you had to move out of a home when you did not want to?



Note: n = 931.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Figure VII-11. Top Reasons for Displacement (among respondents experiencing displacement)

All Respondents		Fort Collins		Loveland		Elsewhere in Larimer County	
1	Rent increased more than I could pay 35%	1	Rent increased more than I could pay 33%	1	Rent increased more than I could pay 42%	1	Job loss, reduced hours or wages 38%
2	Job loss, reduced hours or wages 34%	2	Job loss, reduced hours or wages 30%	2	Job loss, reduced hours or wages 40%	2	Landlord sold my rental unit or complex 38%
3	Other 20%	3	Other 20%	3	Other 25%	3	Rent increased more than I could pay 23%
4	Landlord sold my rental unit or complex 20%	4	Change in household size 17%	4	Landlord sold my rental unit or complex 21%	4	Conflict with partner or roommate 23%
5	Change in household size 18%	5	Landlord sold my rental unit or complex 16%	5	Change in household size 19%	5	HOA fees increased more than I could pay 15%

Note: n = 147.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

Impacts of displacement. Among Larimer County respondents who experienced displacement:

- 72% said it took more than one month to find a new place to live;
- Over half (55%) experienced higher rent or housing costs after displacement;
- One-third (33%) reported longer commutes to work or school; and
- 30% said that the quality of their apartment or home was worse than the home from which they were displaced.

The most common reason for displacement is rising rents and yet over half end up in new housing situations with higher rents—suggesting that displacement can quickly become a recurring experience.

Housing search barriers. The survey asked respondents to select potential barriers they have experienced when looking for housing in Larimer County over the past five years. The most common barrier was unreturned calls from landlords or agents (18%). When such barriers are disproportionately experienced by protected class groups, they can be an indicator of potentially discriminatory behaviors occurring in the marketplace.

Among survey respondents, single parents and overcrowded households reported the highest rates of landlords not returning calls and landlords prohibiting service or emotional support animals. Hispanic and Mixed or Multiracial respondents were more likely than non-Hispanic white respondents to report that they were told a unit was available over the phone, but then told it was not available when they showed up in person.

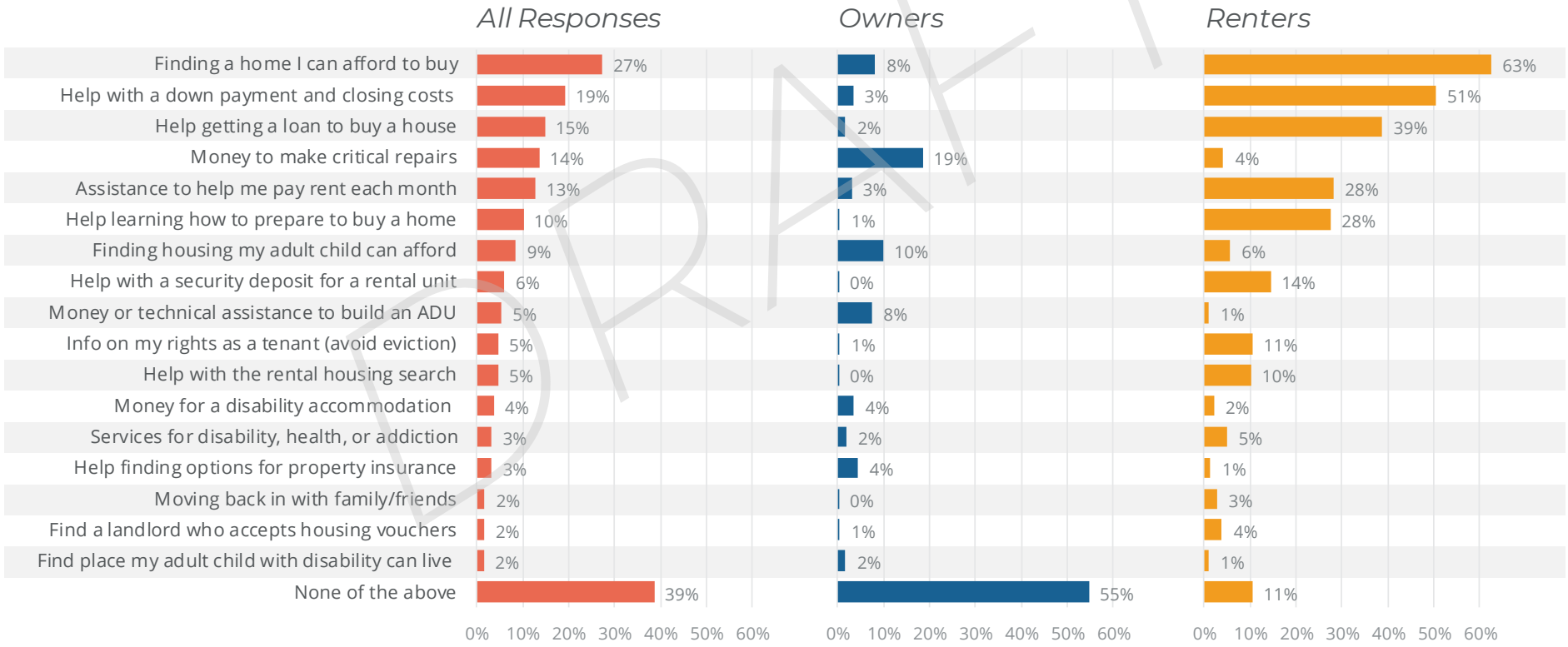
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SECTION VII. RESIDENT SURVEY ANALYSIS

Housing security. When asked what would help respondents feel more secure in their current housing situation, the most common responses were finding an affordable home to buy; help with a down payment; help getting a home loan; money to make critical repairs; and rental assistance. However, responses varied by tenure and household characteristic (and, to a lesser extent, by jurisdiction). See Figures VII-12 through VII-14.

As shown in Figure VII-12, homeowners were much more likely to say they didn't need anything to feel more secure (55%) than renters (11%). Renters were most likely to want support buying a home (63% finding an affordable home to buy; 51% help with down payment) but 28% also said rental assistance would help them feel more secure. Owners were most likely to say "money to make critical repairs" and "finding housing my adult child can afford."

Figure VII-12.
What do you feel you need to be more secure in your housing situation? Select the three most important items. (By Tenure)



Note: n = 892.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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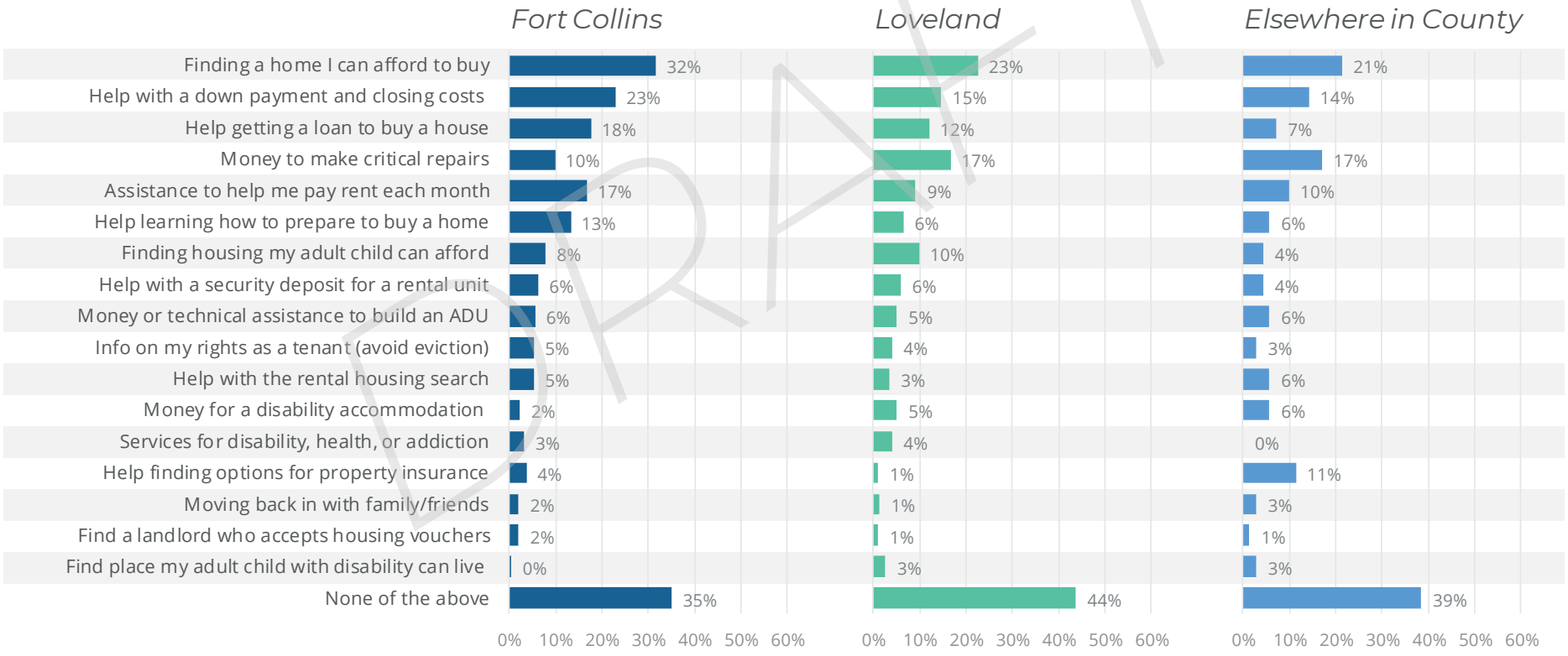
SECTION VII. RESIDENT SURVEY ANALYSIS

Responses by jurisdiction were similar to the overall survey results, with finding an affordable home to buy the most common response in Fort Collins, Loveland, and Elsewhere in the County. The second most common response in Loveland and Elsewhere in the County was money to make critical repairs (likely partially due to the higher homeownership rates in these communities).

Figure VII-14 on the following page shows responses by household characteristic. Help with rent and finding an affordable home to buy were the top responses among mobile home occupants, precariously housed individuals, and those living in subsidized housing.

Large households and older adult households were more likely than other groups to prioritize housing for their adult child.

Figure VII-13.
What do you feel you need to be more secure in your housing situation? Select the three most important items. (By Place)



Note: n = 892.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Figure VII-14.
What do you feel you need to be more secure in your housing situation? Select the three most important items.
(By Household Characteristic)

	All Respondents	Mobile Home Occupant	Precariously Housed	Subsidized Housing	HHs with Children	Older Adults (65+)	HH with a Disability	Large Households
Total respondents	892	25	34	47	197	228	246	63
Finding a home I can afford to buy	27%	24%	53%	47%	31%	12%	33%	27%
Help with a down payment and closing costs	19%	16%	26%	43%	25%	7%	24%	19%
Help getting a loan to buy a house	15%	12%	29%	36%	17%	5%	21%	16%
Money to make critical repairs	14%	20%	15%	4%	17%	8%	15%	14%
Assistance to help me pay rent each month	13%	28%	38%	34%	17%	7%	23%	16%
Help learning how to prepare to buy a home	10%	0%	24%	17%	10%	2%	12%	11%
Finding housing my adult child can afford	9%	8%	9%	15%	11%	10%	14%	22%
Help with a security deposit for a rental unit	6%	4%	26%	19%	9%	4%	14%	11%
Money or technical assistance to build an ADU	5%	0%	6%	6%	7%	7%	7%	11%
Info on my rights as a tenant (avoid eviction)	5%	8%	21%	15%	3%	4%	10%	8%
Help with the rental housing search	5%	4%	24%	15%	6%	2%	9%	8%
Money for a disability accommodation	4%	12%	12%	15%	3%	8%	9%	8%
Services for disability, health, or addiction	3%	0%	12%	17%	2%	4%	10%	0%
Help finding options for property insurance	3%	4%	0%	2%	5%	2%	2%	5%
Moving back in with family/friends	2%	0%	18%	0%	1%	2%	4%	3%
Find a landlord who accepts housing vouchers	2%	12%	3%	17%	2%	1%	4%	0%
Find place my adult child with disability can live	2%	4%	3%	0%	1%	4%	4%	5%
None of the above	39%	12%	12%	11%	33%	55%	23%	27%

Note: n = 892.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

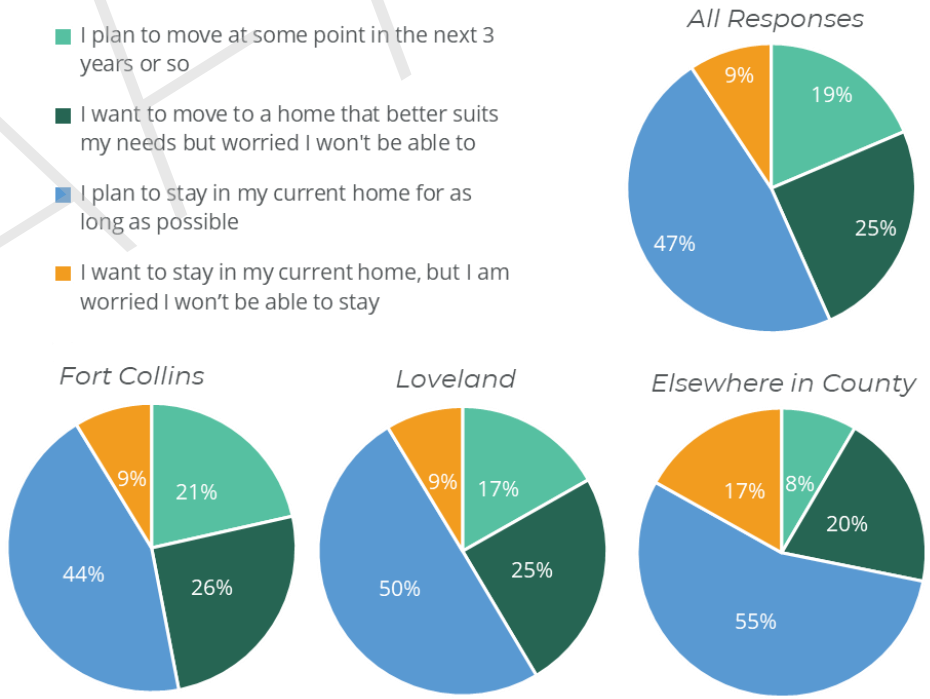
Select open-ended responses to improve housing security included:

- "I will need a more accessible home soon. Too many steps, but can't afford a ramp." – *Renter in Loveland*
- "Can't afford medical insurance because rent is too high." – *Renter in Loveland*
- "I am stably housed and prioritize rent every month. I have never been late on a payment. However, I do live pay check to pay check. With the cost of living rising, it is very challenging to set aside money for emergency savings. If an emergency were to come up, I would not be in a good spot. If I lost my current employment, I would definitely be at risk of homelessness." – *Renter in Fort Collins*
- "Help figuring out how to be able to move to a single level unit on the same property." – *Renter in Fort Collins*
- "Much more affordable senior housing. Currently everything has a minimum 2 year waiting list." – *Mobile home occupant in Fort Collins*
- "I am on Social Security and my lot rent increases every year. I will have move at some point because it will be unaffordable even though I own my home." – *Mobile home occupant in Fort Collins*
- "Finding an actual house that accepts a housing voucher and modifications" – *Resident living Elsewhere in Larimer County*

FUTURE HOUSING CHOICE

Nearly half of survey respondents (47%) plan to stay in their current home as long as possible. That proportion is even higher in Loveland (50%) and Elsewhere in the County (55%). Forty-three percent of survey respondents indicated they want to move in the next three years—that group is split between people who "plan" to move and those who would like to move but are worried they won't be able to.

Figure VII-15 Future Housing Plans



Note: n = 914 for plans to move; n = 393 for reasons for wanting to move.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Among those who plan or want to move in the next three years, just over half (53%) wanted to move to find a different sized home or yard, followed by 46% who rent and wanted to own. About one third wanted to find more affordable housing and one quarter want to move to a different neighborhood.

Barriers to moving. A quarter (25%) of respondents wanted to move but are worried they will not be able to. The most selected barrier to moving was the inability to afford rents (57%), followed by inability to afford application fees or security deposits (31%), inability to afford other homes at current prices (31%), and bad or no credit history (19%).

Other open-ended responses included:

- "Affordable homes on a single salary cannot be found in my neighborhood." – *Renter in Fort Collins*
- "I can't save for a downpayment due to rising costs of everything." – *Renter in Fort Collins*
- "I grew up in Fort Collins and feel like I need to leave the state to afford to buy a house." – *Renter in Fort Collins*
- "Lack of affordable senior housing" – *Mobile Home Occupant in Fort Collins*

Figure VII-16. Future Housing Plans and Barriers to Moving

I want to move to a home that better suits my needs but worried I won't be able to...

	All Respondents		Fort Collins		Loveland		Elsewhere in Larimer County	
	25%		26%		25%		20%	
Barriers to Moving								
1	I can't afford rents in other apartments/homes	57%	I can't afford rents in other apartments/homes	63%	I can't afford rents in other apartments/homes	57%	Want to sell but can't afford to purchase something else	57%
2	I can't afford application fees or security deposit	31%	I can't afford application fees or security deposit	33%	Want to sell but can't afford to purchase something else	32%	I can't afford rents in other apartments/homes	21%
3	Want to sell but can't afford to purchase something else	31%	Other	27%	I can't afford application fees or security deposit	31%	I can't afford application fees or security deposit	14%
4	Other	23%	Want to sell but can't afford to purchase something else	24%	I have bad or no credit history	23%	None of the above	7%
5	I have bad or no credit history	19%	I have bad or no credit history	17%	Other	23%	I have a felony/criminal record and cannot find a place to rent	7%

Note: n = 914 for plans to move; n = 218 for barriers to moving.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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Barriers to staying in home. Nearly one out of every ten respondents (9%) said they want to stay in their current home but are worried they won't be able to do so. That proportion was higher in portions of the county outside Loveland and Fort Collins. Top reasons were housing cost increases and health concerns (e.g., aging, disability, etc.) and keeping up with maintenance. Those Elsewhere in County were more concerned about upkeep than respondents in other jurisdictions.

Figure VII-17. Future Housing Plans and Barriers to Staying in Current Home

I want to move to a home that better suits my needs but worried I won't be able to...

	All Respondents (25%)		Fort Collins (26%)		Loveland (25%)		Elsewhere in Larimer County (20%)	
Barriers to Moving								
1	I can't afford rents in other apartments/homes	57%	I can't afford rents in other apartments/homes	63%	I can't afford rents in other apartments/homes	57%	Want to sell but can't afford to purchase something else	57%
2	I can't afford application fees or security deposit	31%	I can't afford application fees or security deposit	33%	Want to sell but can't afford to purchase something else	32%	I can't afford rents in other apartments/homes	21%
3	Want to sell but can't afford to purchase something else	31%	Other	27%	I can't afford application fees or security deposit	31%	I can't afford application fees or security deposit	14%
4	Other	23%	Want to sell but can't afford to purchase something else	24%	I have bad or no credit history	23%	None of the above	7%
5	I have bad or no credit history	19%	I have bad or no credit history	17%	Other	23%	I have a felony/criminal record and cannot find a place to rent	7%

Note: n = 914 for plans to move; n = 218 for barriers to moving.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

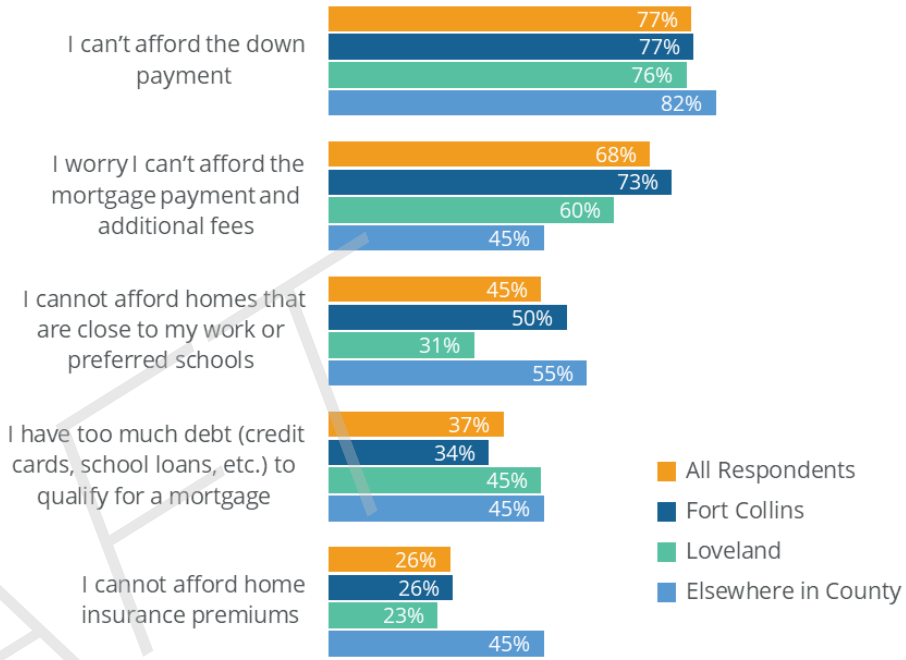
Barriers to homeownership. Renter respondents shared top barriers to homeownership in Larimer County. Seventy-seven percent of renters cited inability to pay the downpayment, followed by 68% who worry they can't afford mortgage payments or additional fees associated with homeownership, 45% cannot afford homes close to work or preferred schools, 37% have too much debt to qualify for a mortgage, and 26% cannot afford home insurance premiums.

Inability to afford a downpayment was the most frequent barrier in all jurisdictions. Respondents who live Elsewhere in Larimer County reported they cannot afford homes close to work or preferred schools (55%) and cannot afford home insurance premiums (45%) at the highest rates.

One potential avenue to affordable homeownership is deed restricted homeownership programs. These programs expand access to homeownership by reserving homes for households that cannot afford market rate prices. In exchange, resale is limited to income-eligible buyers, equity gains may be lower than market value, and homes are typically required to be owner-occupied.

Thirty-eight percent indicated they would be very interested and 31% said they would be interested in such a program. Only 11% reported they were not interested at all.

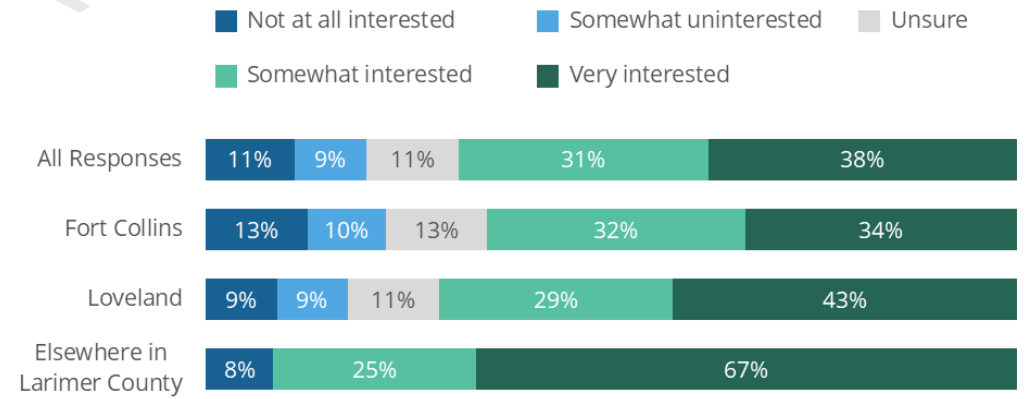
Figure VII-18. Top Barriers to Home-ownership



Note:
n = 265; Reflects renters only.

Source:
Root Policy Research from the 2025 Larimer County Resident Housing Survey.

Figure VII-19. Interest in Deed-Restricted Homeownership Programs



Note: n = 273; Reflects renters only.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

WORK LOCATION AND COMMUTES

This survey evaluated the choices and patterns of commuters that work throughout Larimer County as well as in-commuters to Larimer County. Sixty-eight percent of respondents who are currently working live in the same community that they work. The choices of those who commute outside of their community are evaluated below.

Out of all commuters, only about one-third did *not* consider living in the same community as they work (when they were last looking for housing). Those respondents most commonly said it wasn't important to them to live where they work, they preferred a more rural environment, or have family or friends outside of the city in which they work. Affordability, accommodating a partner's commute, and schools were also top reasons. The diversity of answers shows that the choice of commuting is not a simple one—existing social networks, personal preference and amenities, and timing of job placement and home search are also factors.

Figure VII-20. Percent of Commuters Who Did Not Consider Living in the Community They Work and Top Reasons

I did not consider living in the community where I work	All Commuters 32%		In-Commuters to Fort Collins 28%		In-Commuters to Loveland 42%		In-Commuters to Elsewhere in Larimer County 47%	
Top Reasons for No Consideration								
1	It's not important to me to live in the community I work	44%	It's not important to me to live in Fort Collins	42%	It's not important to me to live in Loveland	53%	Other	41%
2	Other	35%	Other	32%	Other	32%	It's not important to me to live in the community I work	35%
3	I prefer a more rural environment	18%	I prefer a more rural environment	26%	I have family or community outside of Loveland	21%	I prefer a more rural environment	12%
4	I have family or community outside of the community I work	18%	I have family or community outside of Fort Collins	26%	I prefer a more rural environment	16%	I couldn't afford to live in the community I work	12%
5	I couldn't afford to live in the community I work	13%	Accommodate the commute of a household member	21%	I chose schools outside of Loveland	16%	Accommodate the commute of a household member	12%

Note: n = 764 for community consideration; n = 55 for reasons. Reflects respondents who live and work in different communities only.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

For respondents that *did* consider living in the same community that they work in, affordability was a primary factor in their decision to commute. Over half (57%) reported that the inability to find an affordable home to buy was a reason for them choosing a home outside of the community where they work. Respondents also reported that they had more buying power outside of the community they work in—31% said that housing that was affordable was lower quality and 29% said that housing that was affordable was too small. A quarter (25%) said that rents were unaffordable in the city that they work in.

Figure VII-21.
Percent of Commuters Who Considered Living in the Community They Work and Top Reasons

I considered living in the community where I work	All Commuters 68%		In-Commuters to Fort Collins 72%		In-Commuters to Loveland 58%		In-Commuters to Elsewhere in Larimer County 53%	
Top Reasons for Not Living in Same Community as Work								
1	I couldn't find an affordable home to buy	57%	I couldn't find an affordable home to buy	68%	I couldn't find an affordable apartment to rent	42%	I couldn't find an affordable home to buy	47%
2	Housing I could afford was lower quality	31%	Housing I could afford was lower quality	36%	I couldn't find an affordable home to buy	42%	Other	42%
3	Housing I could afford was too small	29%	Housing I could afford was too small	28%	Housing I could afford was too small	35%	I couldn't find an affordable apartment to rent	26%
4	I couldn't find an affordable apartment to rent	25%	I couldn't find an affordable apartment to rent	16%	Housing I could afford was lower quality	31%	Housing I could afford was too small	26%
5	Other	22%	Other	16%	Other	19%	Housing I could afford was lower quality	16%

Note: n = 764 for community consideration; n = 95 for reasons. Reflects respondents who live and work in different communities only.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Open ended responses to "other" reasons in-commuters did not consider living in the community in which they work:

- "Reduced shopping, activity and restaurant options." – *Commutes from Loveland to Elsewhere in Larimer County*
- "I love the community I live in but the job opportunity was elsewhere and I did not want to move for a job" – *Commutes from Fort Collins to Elsewhere in Larimer County*
- "I preferred living in Loveland over Greeley due to amenities and proximity to other cities." – *Commutes from Loveland to Greeley*
- "I don't like how un-diverse Loveland is. It's very conservative, older." – *Commutes from Fort Collins to Loveland*
- ""Too much traffic congestion in Fort Collins." – *Commutes from Loveland to Fort Collins*
- "I prefer to live in a more conservative city." – *Commutes from Loveland to Elsewhere in Larimer County*
- "Want to live in the mountains." – *Commutes from Loveland to Fort Collins*
- "Not the least bit interested in living in Weld County." – *Commutes from Loveland to Weld County*
- "I purchased my home before employment in Wellington." – *Commutes from Fort Collins to Elsewhere in Larimer County*

Open ended responses to "other" reasons in-commuters did consider living in the community in which they work but opted to commute anyway:

- "Berthoud did not have store in the community that I buy things at." – *Commutes from Loveland to Berthoud*
- "I could not afford to live in a safe neighborhood." – *Commutes from Fort Collins to Loveland*
- "All of my friends and extracurricular activities are in Fort Collins, so I wanted to be closer to Fort Collins. I had to move from Fort Collins because I couldn't afford to live there." – *Commutes from Loveland to Fort Collins*
- "Lack of available housing." – *Commutes from Unincorporated Larimer County to Fort Collins*
- "Low interest rate and new build neighborhood in Berthoud. I lived in Fort Collins 10 years and wanted a change." – *Commutes from Berthoud to Fort Collins*

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SECTION VII. RESIDENT SURVEY ANALYSIS

HOUSING SOLUTIONS AND POLICY INPUT

When asked about the importance of housing types serving various populations, survey respondents countywide rated "housing affordable to those in public service or retail jobs" received the highest rating, followed by "housing affordable to residents on a fixed income (like social security)," and then "starter homes."

Responses were similar in Fort Collins and Loveland, though Fort Collins residents placed a higher importance on supportive housing for people experiencing homelessness than respondents in other areas. Respondents living Elsewhere in Larimer County placed higher importance on homeownership: top ratings were starter homes and homes for middle class families.

Figure VII-22. Rating of Importance of Housing Type in Community, Jurisdiction



Note: n = 693.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

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SECTION VII. RESIDENT SURVEY ANALYSIS

Land use. As shown in Figure VII-23, survey respondents were very open to "light density" housing products in their neighborhoods, including duplexes, townhomes, and accessory dwelling units (ADUs).

Allowing and adding more of these accepted product types can help create more natural affordability in existing neighborhoods as attached products typically have lower price points.

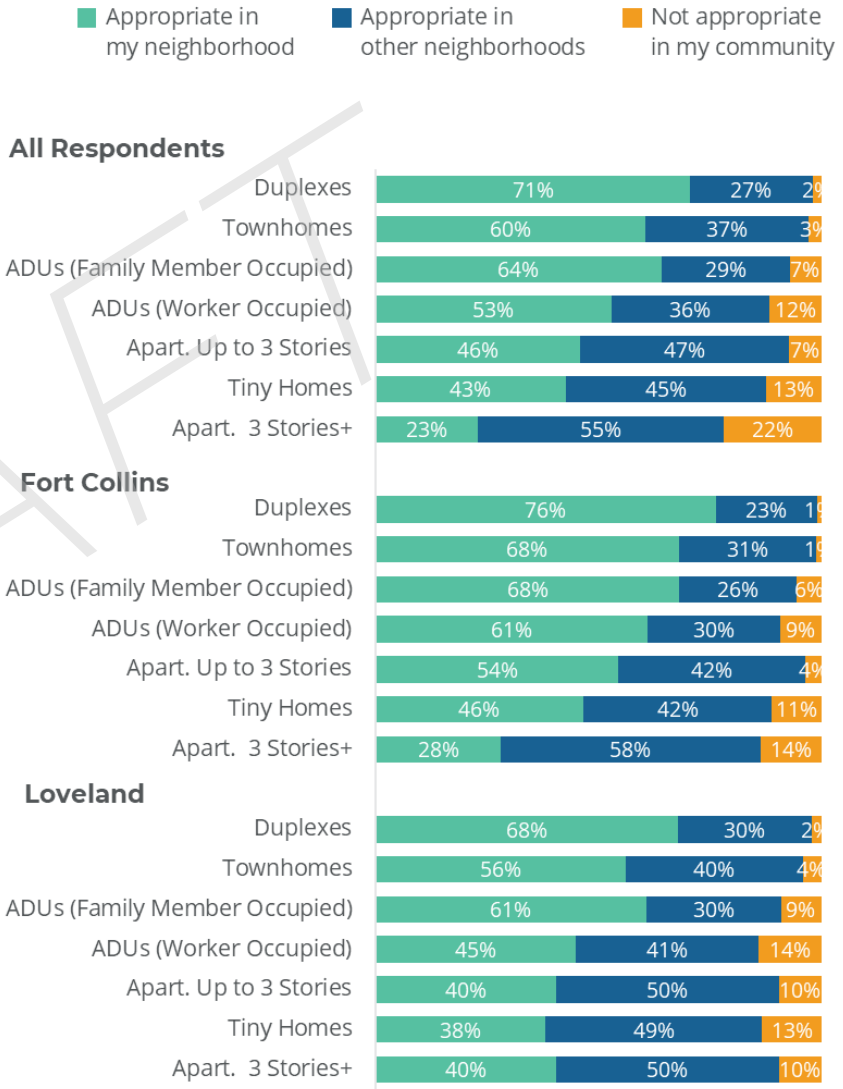
There was also relatively strong support for 3-story apartment buildings in respondents' communities, with the caveat that they are located at bus stops or major roads. This type of multifamily housing is an important product type to serve many of the households respondents want to accommodate (e.g., retail workers, residents on fixed incomes, etc.).

Affordability tradeoffs. Survey respondents were also asked about personal and community-oriented tradeoffs they would be willing to accept in order to make their communities more affordable.

- Sixty-percent said they would allow duplexes or townhomes to be built in their neighborhood (in line with previous housing type ratings) and 57% who would allow a small lot in their neighborhood.
- There was also support for requirements on developers making a portion of their developments affordable (59%).
- On financial tradeoffs, respondents were most open to higher property taxes on high value homes, but a majority (54%) also said they would pay $50 more per year in taxes to support an affordable housing fund.

Figure VII-24 on the following page shows these affordability tradeoffs by jurisdiction.

Figure VII-23.
Appropriateness of Housing Type by Location



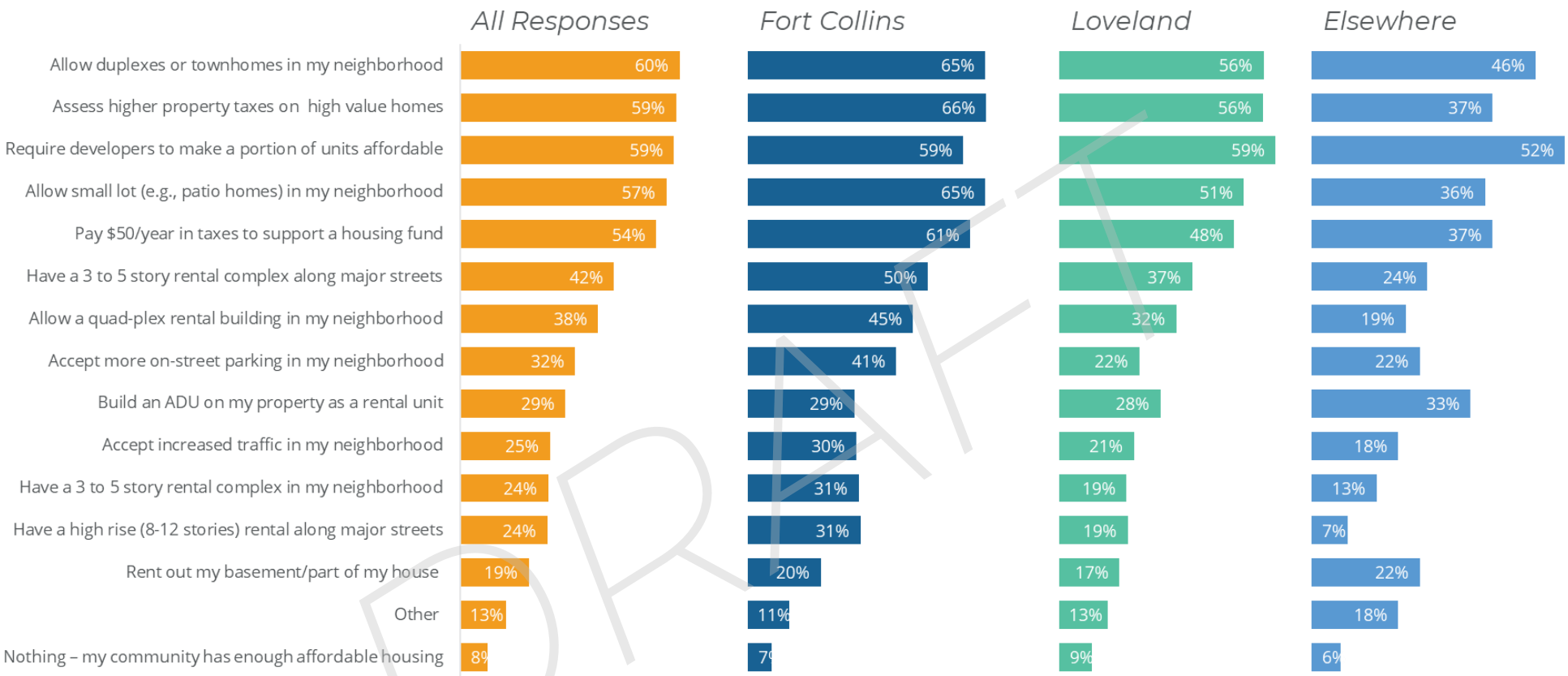
Note: n = 273; Reflects renters only.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey

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SECTION VII. RESIDENT SURVEY ANALYSIS

Figure VII-24. Trade-Offs to Make Housing More Affordable in Community, by Jurisdiction



Note: n = 839.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey.

Other open-ended responses by residents on tradeoffs included:

- "Build and allow short term rental small housing complex for seasonal workers and service providers (so that they will service our area)" – *Homeowner in Unincorporated Larimer County*
- "Promote tiny home villages with services (e.g. AA meetings, communal kitchens and showers)" – *Homeowner in Loveland*
- "Get rid of Metros and HOAs which drive up monthly costs. Get home owners insurance and interest rate down." – *Homeowner in Loveland*

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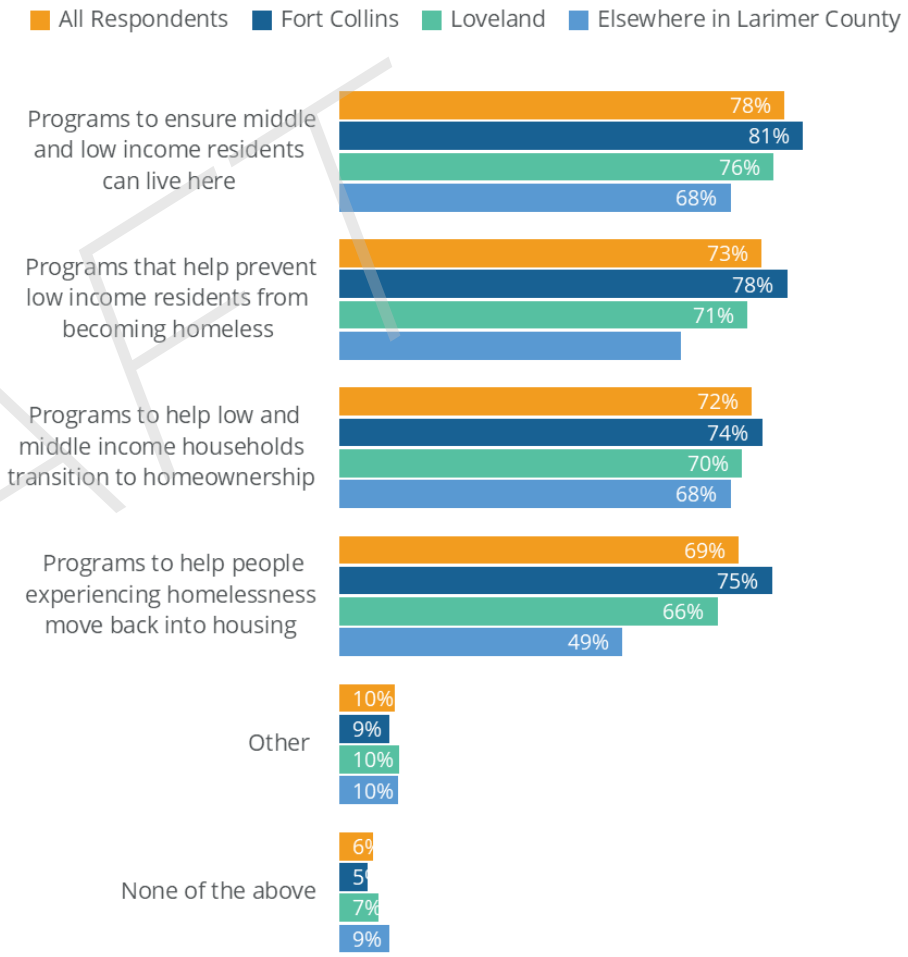
SECTION VII. RESIDENT SURVEY ANALYSIS

Program priorities. When asked what types of programs respondents would like to see their local government invest in over the next five years, there was fairly broad support for a range of affordability programs. Very few respondents (less than 10% in all jurisdictions) said their local government should not invest in any of the specified program types. See Figure VII-25.

"Other" open-ended answers included:

- "Requirements for landlords to maintain high-quality homes (even in areas without an HOA). Landlords should care about their community and should not be allowed to charge high rent with no house improvements or care for maintaining the quality of the home." – *Homeowner in Fort Collins*
- "Senior citizen housing that is advertised and very affordable." – *Renter in Loveland*
- "Disabled citizens should be prioritized." – *Respondent in Loveland*
- "Change the zoning laws to encourage builders to build modest homes or more patio homes." – *Renter in Fort Collins*
- "No new programs -just fund the ones like Neighbor to Neighbor that are working well." – *Homeowner in Fort Collins*
- "Access to mental health services and education." – *Unincorporated Larimer County*

Figure VII-25.
Which types of housing programs should your City and/or County invest in over the next five years?



Note: n = 845.

Source: Root Policy Research from the 2025 Larimer County Resident Housing Survey

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SECTION VIII. HOUSING NEEDS

This section evaluates affordability trends as well as growth projections to evaluate housing needs across Larimer County, Loveland and Fort Collins. The analysis focuses both on affordability mismatches in the current market—which can be addressed either through subsidies of existing units or production of lower priced units—as well as production estimates of new housing units currently needed (based on undersupply) and projections of future housing needs based on the methodology compliant with Colorado state requirements.

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SECTION VIII. HOUSING NEEDS

AFFORDABILITY GAPS

Root Policy Research conducted a modeling effort called a gaps analysis to examine how the county's housing market is meeting the affordability needs of current residents. The gaps analysis compares the supply of housing at various price points to the number of households who can afford such housing. If there are more housing units than households, the market is "oversupplying" housing at that price point. Conversely, if there are too few units, the market is "undersupplying" housing at that price point. The affordability gaps analysis completed for Larimer County addresses both rental affordability and ownership opportunities for renters looking to buy.

Note that the gaps analysis is intended to evaluate affordability needs among current residents not the need for additional housing to accommodate future or potential residents. Gaps identified in these analyses could be addressed through the production of new housing units at affordable price points or with subsidies on existing units (e.g., Housing Choice Vouchers for rental units or downpayment assistance for ownership units).

Affordability gap in the rental market. The rental gaps analysis compares the number of renter households by income level and the maximum monthly housing payment they can afford, with the number of affordable housing units in the market, including income-restricted affordable units. The "Rental Mismatch" column in Figures VIII-1 and VIII-2 shows the difference between the number of renter households and the number of rental units affordable to them at that price point. Negative numbers indicate a shortage of units at specific income levels; positive units indicate an excess of housing at that price point. Affordability gaps are shown by household AMI ranges published by HUD for a 2-person household (in line with the average household size) in Larimer County.

Figure VIII-1.
Rental Affordability Gap: Larimer County and Unincorporated Areas

Income Range By AMI	Maximum Affordable Rent	Rental Demand: Current Renters		Rental Supply: Current Units		Mismatch (Affordability Gap)	Cummulative Affordability Gap
		Num.	Pct.	Num.	Pct.		
Larimer County							
0-30% AMI	$713	12,952	22%	3,581	6%	**(9,371)**	**(9,371)**
31-50% AMI	$1,189	8,080	14%	7,735	13%	**(346)**	**(9,716)**
51-60% AMI	$1,427	4,981	8%	7,230	12%	2,249	**(7,467)**
61-80% AMI	$1,902	10,779	18%	17,909	29%	7,129	**(338)**
81-100% AMI	$2,378	5,958	10%	12,363	20%	6,405	6,067
101-120% AMI	$2,853	4,042	7%	7,166	12%	3,124	9,191
120% AMI +	$2,853 +	12,261	21%	5,117	8%	(7,143)	2,048
Total / Low Income Gap (<50% AMI)		***59,053***	***100%***	***61,101***	***100%***	***(9,716)***	
Unincorporated County							
0-30% AMI	$713	546	19%	127	4%	**(419)**	**(419)**
31-50% AMI	$1,189	488	17%	708	23%	221	**(199)**
51-60% AMI	$1,427	244	8%	514	17%	270	72
61-80% AMI	$1,902	473	16%	731	24%	258	330
81-100% AMI	$2,378	256	9%	553	18%	297	627
101-120% AMI	$2,853	224	8%	327	11%	103	730
120% AMI +	$2,853 +	703	24%	143	5%	(560)	170
Total / Low Income Gap (<30% AMI)		***2,934***	***100%***	***3,104***	***100%***	***(419)***	

Source: 2024 1-year ACS, 2023 5-year ACS (applies to unincorporated), and Root Policy Research.

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SECTION VIII. HOUSING NEEDS

The rental affordability gaps analysis shows that:

- Collectively, there is an affordability shortage of 9,716 units for renters with incomes below 50% AMI in Larimer County (even after accounting for the County's income-restricted rental inventory). The largest affordability gap is for households below 30% AMI. Nearly 13,000 households fall within this income range and only 3,600 units are affordable to them (<$713 per month).

- Renters with incomes at or below 50% AMI who cannot find units affordable to them due to supply shortages are "renting up" into higher priced units, facing cost burden and constraining supply for renters up to 80% AMI (as evidenced by the cumulative affordability gap column).

- The "shortage" that appears for higher income households (120% AMI or more) does theoretically show a mismatch in their ability to pay for higher priced rental units and the lack of units at that higher price point. However, it does not necessarily mean they prefer higher priced units. Many households in this income range will "rent down" to spend less than 30% of their income on housing to save money or a downpayment to purchase a home. This increases competition for naturally affordable rental units limiting the inventory of units for people with lower incomes even more.

- In unincorporated Larimer County there is an affordability shortage of 419 units for renters earning less than 30% AMI, with cumulative shortages extending up to 50% AMI.

Figure VIII-2. Rental Affordability Gap: Fort Collins and Loveland

Income Range By AMI	Maximum Affordable Rent	Rental Demand: Current Renters		Rental Supply: Current Units		Mismatch (Affordability Gap)	Cummulative Affordability Gap
		Num.	Pct.	Num.	Pct.		
Fort Collins							
0-30% AMI	$713	8,400	23%	2,262	6%	**(6,138)**	**(6,138)**
31-50% AMI	$1,189	5,649	15%	5,442	14%	**(208)**	**(6,346)**
51-60% AMI	$1,427	3,299	9%	4,432	12%	1,133	**(5,213)**
61-80% AMI	$1,902	7,084	19%	11,253	30%	4,169	**(1,044)**
81-100% AMI	$2,378	3,174	9%	7,895	21%	4,721	3,677
101-120% AMI	$2,853	2,020	6%	3,943	10%	1,922	5,600
120% AMI +	$2,853 +	7,026	19%	2,551	7%	(4,476)	1,124
Total / Low Income Gap (<50% AMI)		***36,654***	***100%***	***37,778***	***100%***	***(6,346)***	
Loveland							
0-30% AMI	$713	3,612	29%	698	5%	**(2,914)**	**(2,914)**
31-50% AMI	$1,189	1,127	9%	2,144	16%	1,017	**(1,897)**
51-60% AMI	$1,427	763	6%	1,686	12%	923	**(974)**
61-80% AMI	$1,902	1,670	14%	4,300	32%	2,630	1,656
81-100% AMI	$2,378	1,386	11%	2,509	19%	1,122	2,778
101-120% AMI	$2,853	1,047	8%	1,184	9%	137	2,915
120% AMI +	$2,853 +	2,737	22%	1,021	8%	(1,716)	1,199
Total / Low Income Gap (<30% AMI)		***12,342***	***100%***	***13,541***	***100%***	***(2,914)***	

Source: 2024 1-year ACS and Root Policy Research.

- In Fort Collins, households earning 0-30% AMI and 31-50% AMI face shortages in the supply of affordable rental units priced within their affordable ranges. Due to these shortages, renters who do not find affordable units rent higher priced units, resulting in a cumulative shortage of rentals affordable to 80% AMI. It is difficult, given data limitations, to easily separate out renters who are students and may receive assistance from parents, student loans and/or other non-income sources. Therefore, the rental gap shown is an upper-bound estimate of need in Fort Collins.

- In Loveland, mismatches in the supply of rental units by price and renter households who can afford them affect households earning 0-30% AMI. Cumulative shortages resulting from households "renting up" affect households earning up to 60% AMI.

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SECTION VIII. HOUSING NEEDS

Affordability gap in the for-sale market. The for-sale gaps analysis shows the affordability mismatch between prospective buyers (current renters) and available housing products. Similar to the rental gaps analysis, the model compares renters, their income levels, the maximum monthly housing payment they can afford, and the proportion of for-sale units that were affordable to them. Renters are used to determine for-sale gaps because the analysis intends to capture renters' ability to purchase a home (as opposed to existing owners' ability to sell and buy).

The renter purchase mismatch shows the difference between the proportion of prospective buyers (current renters) and the proportion of homes sold in their price range in 2024-2025 (excluding mobile/manufactured homes). Negative percentages indicate a shortage of units for sale at specific price points; positive percentages indicate an excess of units. The cumulative gap column excludes households earning less than 50% AMI as they are least likely to be prospective buyers. The for-sale affordable gaps analysis shows that:

- For-sale affordability gaps in Larimer County are concentrated among households with incomes below 120% AMI but persist for households earning up to 150% AMI.
- 44% of potential first-time buyers had incomes between 51% and 120% AMI, but only 8% of homes sold were affordable to them—a 36 percentage point gap.

Figure VIII-3. Affordability Gaps in For-Sale Market

Income Range By AMI	Maximum Affordable Home Price	Potential Demand of 1st Time Buyers (Current Renters)		For-Sale Supply (Homes Sold 2024-2025)		Renter Purchase Mismatch	Cumulative Affordability Gap excl. < 50% AMI
		Num.	Pct.	Num.	Pct.		
Larimer County							
0-50% AMI	$149,134	21,032	35.6%	12	0.1%	-35.5%	*excluded*
51-80% AMI	$238,615	15,760	26.7%	85	1.0%	-25.7%	-25.7%
81-100% AMI	$298,269	5,958	10.1%	217	2.4%	-7.7%	-33.4%
101-120% AMI	$357,922	4,042	6.8%	397	4.4%	-2.4%	-35.8%
121-150% AMI	$447,403	5,066	8.6%	1,430	16.0%	7.4%	-28.4%
150% AMI +	$447,403 +	7,194	12.2%	6,801	76.1%	63.9%	35.5%
Unincorporated County							
0-50% AMI	$149,134	1,034	35.2%	4	2.1%	-33.2%	*excluded*
51-80% AMI	$238,615	717	24.4%	9	4.7%	-19.8%	-19.8%
81-100% AMI	$298,269	256	8.7%	12	6.2%	-2.5%	-22.3%
101-120% AMI	$357,922	224	7.6%	18	9.3%	1.7%	-20.6%
121-150% AMI	$447,403	335	11.4%	26	13.5%	2.0%	-18.5%
150% AMI +	$447,403 +	368	12.5%	124	64.2%	51.7%	33.2%
Fort Collins							
0-50% AMI	$149,134	14,050	38.3%	0	0.0%	-38.3%	*excluded*
51-80% AMI	$238,615	10,383	28.3%	48	1.9%	-26.5%	-26.5%
81-100% AMI	$298,269	3,174	8.7%	100	3.9%	-4.8%	-31.3%
101-120% AMI	$357,922	2,020	5.5%	164	6.3%	0.8%	-30.5%
121-150% AMI	$447,403	2,430	6.6%	355	13.7%	7.1%	-23.4%
150% AMI +	$447,403 +	4,596	12.5%	1,926	74.3%	61.7%	38.3%
Loveland							
0-50% AMI	$149,134	4,739	38.4%	3	0.4%	-38.0%	*excluded*
51-80% AMI	$238,615	2,433	19.7%	5	0.6%	-19.1%	-19.1%
81-100% AMI	$298,269	1,386	11.2%	15	1.8%	-9.4%	-28.5%
101-120% AMI	$357,922	1,047	8.5%	54	6.5%	-2.0%	-30.5%
121-150% AMI	$447,403	1,393	11.3%	196	23.7%	12.4%	-18.1%
150% AMI +	$447,403 +	1,344	10.9%	554	67.0%	56.1%	38.0%

Note: Affordability estimates assume a 30-year mortgage, 6.22% interest rate, 10% down payment, and an additional 30% of monthly housing costs are assumed to go toward ancillary costs such as HOA fees, utilities, and taxes

Source: Larimer County Assessor, 2024 1-year ACS, 2023 5-year ACS (applies to unincorporated), and Root Policy Research.

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SECTION VIII. HOUSING NEEDS

- The cumulative gap shows that at incomes of 150% AMI, there is a 28 percentage point gap between the share of renter households earning 51-150% AMI (52%) and the share of home sales that were affordable to them (24%).
- In unincorporated areas, purchase gaps are concentrated below 100% AMI but extend up to 150% AMI. There is a 22 percentage point gap between the proportion of households earning 51% to 100% AMI and the homes sold that were affordable to them.
- In Fort Collins purchase gaps are concentrated below 100% AMI but extend up to 150%AMI:
  - 37% of potential first-time buyers had incomes between 51% and 100% AMI, but only 6% of homes sold were affordable to them—as 31 percentage point gap.
  - The cumulative gap shows a 23 percentage point gap for households earning less than 150% AMI.
- In Loveland purchase gaps are concentrated below 120% AMI but extend up to 150% AMI.
  - 39% of potential first-time buyers had incomes between 50% and 120% AMI, but only 9% of homes sold were affordable to them—as 30 percentage point gap.
  - The cumulative gap shows an 18 percentage point gap for households earning less than 150% AMI.
- The affordability gap across all jurisdictions at these entry-level price-points indicates a strong need for additional affordable ownership options for current residents either through production of new affordable homes or subsidies on existing units (e.g., land trust or deed restrictions, downpayment assistance, etc.). Renters who cannot afford to purchase a home will either remain in rental units longer or look to move elsewhere to purchase a home.

Affordability gaps summary. The affordability gaps analysis highlights the failure of the current housing market to serve renters earning less than 50% AMI and would-be buyers earning less than 120% AMI. In other words, demand outweighs the supply of affordable, available units at these price points.

- In Larimer County, rental affordability needs are concentrated below 50% AMI (but extend up to 80% AMI) and purchase affordability needs are concentrated below 120% AMI (but extend up to 150% AMI).
- In unincorporated areas, rental affordability needs are concentrated below 30% AMI (but extend up to 50% AMI) and purchase affordability needs are concentrated below 100% AMI (but extend up to 150% AMI).
- In Fort Collins, rental affordability needs are concentrated below 50% AMI (but extend up to 80% AMI) and purchase affordability needs are concentrated below 100% AMI (but extend up to 150% AMI).
- In Loveland, rental affordability needs are concentrated below 30% AMI (but extend up to 60% AMI) and purchase affordability needs are concentrated below 120% AMI (but extend up to 150% AMI).

These gaps could be addressed through the production of new housing units at affordable price points or with subsidies on existing units (e.g., Housing Choice Vouchers for rental units or downpayment assistance for ownership units). The affordability needs highlighted here should be considered when developing program and policy priorities throughout the county.

The gaps analysis reflects a snapshot in time. Affordability needs can shift with market changes or substantial changes in production.

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SECTION VIII. HOUSING NEEDS

HOUSING PRODUCTION NEEDS

The rental and purchase affordability gaps explained in the previous section indicate *affordability* needs, which may be addressed by constructing new units at affordable price points *or* by providing subsidies—such as vouchers for renter households or downpayment assistance for home purchases—to households at affected income levels. This production needs analysis estimates **new housing units needed** based on overcrowding and low vacancy rates—challenges which cannot be addressed by providing subsidies for existing units—and future growth.

Production needs, referred to here as "catch-up needs" and "keep-up needs," are estimated with methodology designed by Colorado's Department of Local Affairs to estimate current and future housing units needed to ensure housing availability and stability through 2035. Keeping with DOLA guidance, catch-up and keep-up needs are calculated first at the county level, then discussed at the jurisdictional level for communities participating in the regional HNA (i.e., Loveland and Fort Collins).

Current "catch-up" units needed. The following analysis estimates the number of dwelling units by income level that are needed to ensure housing availability and stability for current Larimer County resident and employee households. The approach used to estimate housing needs follows guidance from Colorado's Department of Local Affairs, accounting for overcrowding and vacancy rate adjustments:

- Additional housing units are needed where vacancy rates are low (when rental vacancy rates are below 5% and/or where owner vacancy rates are below 2%). ACS estimates show that Larimer County's rental vacancy rate is 3.3%, while the owner vacancy rate is 0.8%. To reach a rental vacancy rate of 5%, an additional 1,101 rental units are needed. To reach an ownership vacancy rate of 2%, an additional 1,258 ownership units are needed.

- The 1,101 rental units and 1,258 ownership units needed for vacancy allowances are distributed by AMI level according to the current income distribution of Larimer County's owner and renter households. For example, 22% of Larimer County's renter households have incomes of 0-30% AMI, so 22% of the 1,101 rental units needed for vacancy allowances (241 rental units) are needed at 0-30% AMI.

- In addition to accounting for vacancy allowances, current "catch-up" units needed should alleviate overcrowding (defined by HUD as more than one person per room). According to ACS estimates, 2,017 households in Larimer County are overcrowded. DOLA HNA Guidelines state that additional housing units are needed to alleviate overcrowding at a rate of one new housing unit for every two overcrowded households. In Larimer County overall, 1,009 new housing units are needed to alleviate overcrowding.

- Households that are currently overcrowded often include potential households who would prefer to live in their own units but are sharing the housing of others to manage costs on low incomes. This is often a response to a lack of housing units attainable at their incomes and/or to a lack of housing assistance to bring available units into their affordable price ranges. Units needed to alleviate overcrowding are therefore assumed to be most needed at income levels where the rental market currently under-provides units. The rental affordability gaps analysis presented earlier in this Section shows that renter households face the greatest shortage of units at 0-30% AMI, so all 1,009 new housing units needed to alleviate overcrowding in Larimer County are needed as rental units at 0-30% AMI.

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- Counts of housing units needed to address low vacancy rates by income and tenure are added to counts of housing units needed to address overcrowding by income and tenure.

The analysis shows that Larimer County **needs 3,394 new housing units** (1,285 units for sale and 2,109 rental units), to accommodate current demand. Figure VIII-4 shows total housing units currently needed distributed by AMI level. The affordability gaps analyses shown earlier show that in addition to these "catch-up" units needed, Larimer County would need to provide additional new units or subsidies to increase access to homeownership for current renters up to 120% AMI and to alleviate cost burden for current renters up to 50% AMI.

Figure VIII-4. Current Units Needed ("Production Catch-up Needs"), Larimer County

	Total Units Needed	Owner Units Needed	Renter Units Needed
0-30% AMI	1,352	102	1,250
31-50% AMI	245	94	151
51-60% AMI	152	59	93
61-80% AMI	322	121	201
81-100% AMI	225	114	111
101-120% AMI	175	100	75
121-140% AMI	158	95	63
141-150% AMI	79	48	31
151% AMI +	687	553	134
Total Catch-Up Units Needed	**3,394**	**1,285**	**2,109**

Source: 2024 1-year ACS, 2023 5-year ACS, and Root Policy Research.

Projected "keep-up" units needed. The following analysis estimates the number of dwelling units by income level that are needed to ensure housing availability and stability for *future* resident and employee households. This methodology focuses only on the additional housing units needed for future households and does not take current units needed (above) and affordability gaps into account. Specifically:

- DOLA projections for households in Larimer County are used to estimate how many additional households the county will have in 2030 and 2035 relative to 2025 (+6,268 households by 2030; +14,050 households by 2035).
- Assuming that the county maintains its current homeownership rate of 63%, the 14,050 new households by 2035 would include 8,911 owner households and 5,139 renter households.
- DOLA's methodology prescribes that at least 2% of ownership and 5% of rental units should be vacant. Applying these vacancy allowances to the numbers of new owner and renter households that the county expects to gain by 2035, the county would need to add 9,093 new units for purchase (to accommodate the 8,911 new owner households) and 5,409 new rental units (to accommodate the 5,139 new renter households)—a total of 14,502 units.
- The total numbers of new units needed by tenure are distributed by income according to the current income distribution of Larimer County households by tenure. For example, because 7.8% of Larimer County homeowner households have incomes of 100-120% AMI, 7.8% of the 9,093 ownership units Larimer County needs to add by 2035 (708 units) should be priced within the affordable price range for households earning 100-120% AMI.

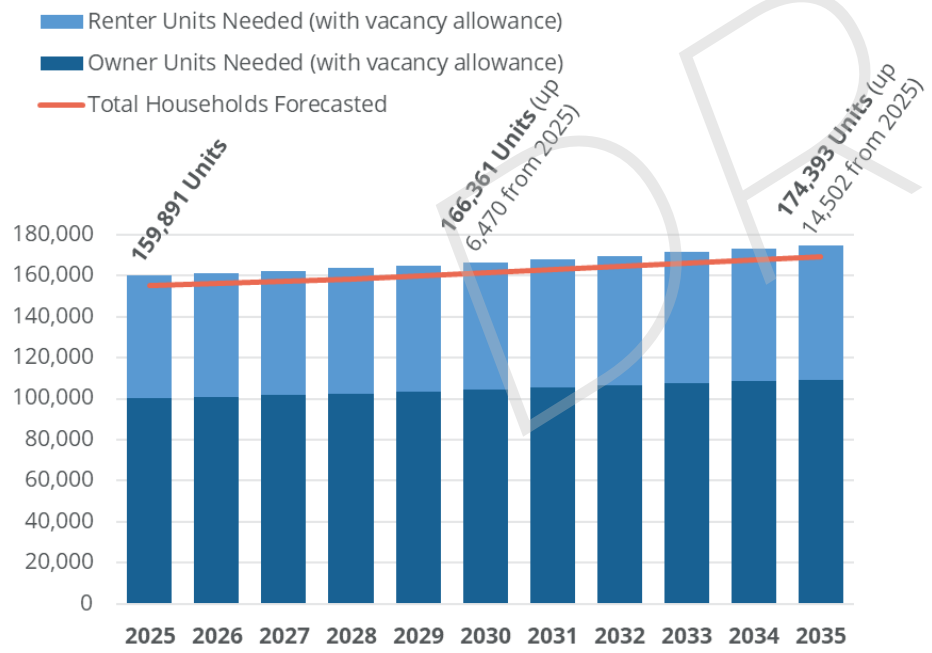
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SECTION VIII. HOUSING NEEDS

- Root also considered adjustments to the income/affordability levels to account for differences in the income profile of existing residents relative to workers who may relocate to Larimer County (including current in-commuters and/or workers filling new jobs). However, the available data do not show significant differences between in-commuter and resident workforce incomes. As such, the income profile of existing residents remains the best proxy for future needs by income/affordability.

In short, the future housing needs show that the county is expected to add 14,050 new households in the next ten years, and the county would need to **add an additional 14,502 units to accommodate these new households.** Of those units, 9,093 would need to be owner occupied in order to maintain current homeownership levels.

Figure VIII-5. Projected Needs by Tenure, Larimer County



Source: Colorado State Demographer and Root Policy Research.

Figure VIII-6 distributes the 14,502 new housing units needed in Larimer County by 2035 by tenure and by AMI affordability level assuming a constant homeownership rate and income distribution.

Figure VIII-6. Projected Units Needed ("Production Keep-up Needs") through 2035, Larimer County

	Total Units Needed	Owner Units Needed	Renter Units Needed
0-30% AMI	1,907	720	1,186
31-50% AMI	1,408	668	740
51-60% AMI	872	416	456
61-80% AMI	1,841	854	987
81-100% AMI	1,352	807	546
101-120% AMI	1,078	708	370
121-140% AMI	983	674	309
141-150% AMI	492	337	155
151% AMI +	4,570	3,911	659
Total Keep-Up Units Needed	**14,502**	**9,093**	**5,409**

Source: 2024 1-year ACS, Colorado State Demographer, and Root Policy Research.

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Distributed needs across jurisdictions. In line with the legislative requirements of SB24-174, current and projected housing units needed are distributed across Fort Collins, Loveland, and Unincorporated Larimer County as shown in Figure VIII-7 (on the following page). Current needs were distributed as follows:

- The additional rental and ownership units needed to achieve 5% rental vacancy and 2% ownership vacancy at the county level are distributed across jurisdictions and the unincorporated county according to the shares of the county's households by tenure who live in each area of the county. Within geographic areas and tenure groups, vacant units align with current income distributions.

- ACS estimates were used to determine the numbers of overcrowded households in Fort Collins, Loveland, and Unincorporated Larimer County. The number of overcrowded households in each area was divided by two to estimate the number of units needed to alleviate overcrowding locally. As in Larimer County overall, units needed to alleviate overcrowding should be rental units priced for households at 0-30% AMI.

DOLA's Housing Needs Assessment Methodology requires that projected housing needs are allocated by jurisdiction with consideration of employment factors (not just current household representation). Projected needs were distributed as follows:

- As discussed in Section II (Economic Trends) there are about 213,000 jobs in Larimer County, 55% of which are in Fort Collins, 24% of which are in Loveland, and 11% of which are in Unincorporated Larimer County. The remaining 10% of jobs are located in other incorporated areas of the county.

- Because employment concentrations within Larimer County will likely shift in the next ten years, the distribution of projected housing units needed is also informed by recent employment growth trends within Larimer County. Within the county:

  - 12% of overall job growth (+827 jobs) occurred in Fort Collins,
  - 47% of overall job growth (+3,410 jobs) occurred in Loveland, and
  - The number of jobs in Unincorporated Larimer County decreased by 743, equivalent to -10% of overall job growth in Larimer County.

- The intra-county distribution of projected housing units needed also accounts for the shares of the county's current households who live in each area of the county. This factor helps account for location preference among workers.

- The total projected rental and ownership units needed in Larimer County are distributed by area according to a weighted measure which equally reflects the share of the county's current jobs that are located in that community, the proportion of the county's job growth since 2018 that occurred in that community, and the share of current household that live in that community. For example, 32% of the future rental and ownership units needed in Larimer County are needed in Loveland because 24% of Larimer County's jobs are located in Loveland, 47% of Larimer County's job growth over the past five years took place in Loveland, and 23% of Larimer County's current households live in Loveland.

Figure VIII-7 on the following page shows housing production needed to "catch up" to current demand and "keep up" with future demand for housing in Loveland, Fort Collins, Unincorporated Larimer County, and Larimer County overall—by tenure and AMI. Note that the table does not include all incorporated areas in the county so jurisdictions shown do not total to Larimer County overall.

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Figure III-7.
Current and Projected Units Needed, Larimer County, Fort Collins, Loveland, and Unincorporated Larimer County

AMI Category	Larimer County			Fort Collins			Loveland			Unincorporated		
	Current Need	Proj. Need	Total Need	Current Need	Proj. Need	Total Need	Current Need	Proj. Need	Total Need	Current Need	Proj. Need	Total Need
Total Units	**3,394**	**14,502**	**17,897**	**1,540**	**5,466**	**7,005**	**748**	**4,573**	**5,321**	**535**	**893**	**1,428**
Ownership Units												
0-30% AMI	102	720	822	32	271	304	26	227	253	24	44	69
31-50% AMI	94	668	763	28	252	280	26	211	237	26	41	67
51-60% AMI	59	416	474	25	157	182	13	131	145	14	26	39
61-80% AMI	121	854	974	55	322	377	27	269	296	28	53	80
81-100% AMI	114	807	920	50	304	354	25	254	279	29	50	79
101-120% AMI	100	708	808	38	267	304	23	223	246	25	44	69
121-140% AMI	95	674	769	33	254	287	22	212	235	21	41	63
141-150% AMI	48	337	384	17	127	144	11	106	117	11	21	31
151% AMI +	553	3,911	4,464	200	1,474	1,674	107	1,233	1,340	120	241	361
Total Needed	**1,285**	**9,093**	**10,378**	**479**	**3,427**	**3,906**	**280**	**2,868**	**3,148**	**298**	**560**	**858**
Rental Units												
0-30% AMI	1,250	1,186	2,436	534	447	981	305	374	679	193	73	266
31-50% AMI	151	740	891	105	279	384	21	233	254	9	46	55
51-60% AMI	93	456	549	61	172	233	14	144	158	5	28	33
61-80% AMI	201	987	1,188	132	372	504	31	311	342	9	61	70
81-100% AMI	111	546	657	59	206	265	26	172	198	5	34	38
101-120% AMI	75	370	446	38	140	177	20	117	136	4	23	27
121-140% AMI	63	309	372	30	117	147	17	98	115	4	19	23
141-150% AMI	31	155	186	15	58	73	9	49	57	2	10	12
151% AMI +	134	659	793	86	248	334	25	208	233	7	41	47
Total Needed	**2,109**	**5,409**	**7,518**	**1,061**	**2,039**	**3,099**	**468**	**1,706**	**2,174**	**237**	**333**	**570**

Note: Projected units needed reflect projected units needed through 2035. AMI limits assume a household size of two.

Source: 2024 1-year and 2023 5-year ACS, Colorado State Demographer, Longitudinal Employer-Household Dynamics (LEHD), and Root Policy Research.

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SECTION IX. BARRIERS, OPPORTUNITES, & RECOMMENDATIONS

This section discusses development costs and barriers, and identifies available resources to support housing programs, production, and preservation. The section concludes with recommendations for initial strategies to address needs and improve affordability.

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SECT. IX. BARRIERS, OPPORTUNITIES, & RECOMMENDATIONS

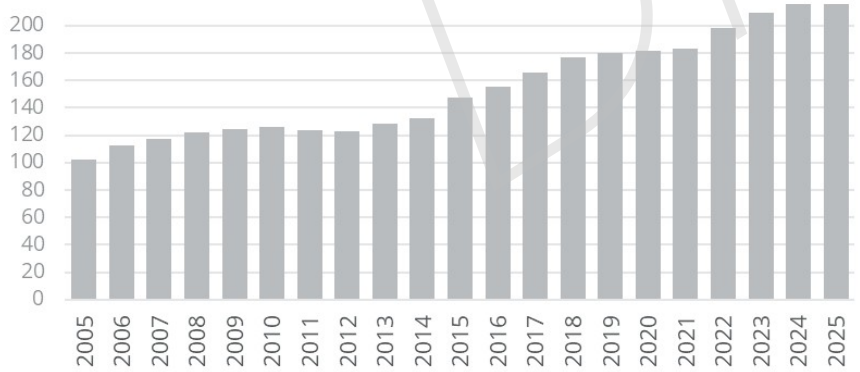
DEVELOPMENT CHALLENGES

Understanding both market limitations and policy barriers helps identify challenges and opportunities for expanding housing options. This section provides context for housing solutions by evaluating trends in construction costs, stakeholder perceptions of development barriers, and challenges to delivering affordable housing (as identified by Fort Collins and Loveland in their respective Consolidated Plans).

Development costs. Construction costs increased steadily across the 2010s and rose rapidly in the early 2020s, driven by a variety of factors including commodity pricing and labor shortages. In recent years, a rise in interest rates has contributed to cost inflation by driving up financing and debt repayment.

Multifamily construction costs. Figure IX-1 presents the Census Bureau's New Construction Cost Index for multifamily homes in the United States to show that that the cost index for multifamily construction increased by 23% since 2020 and by 78% since 2010.

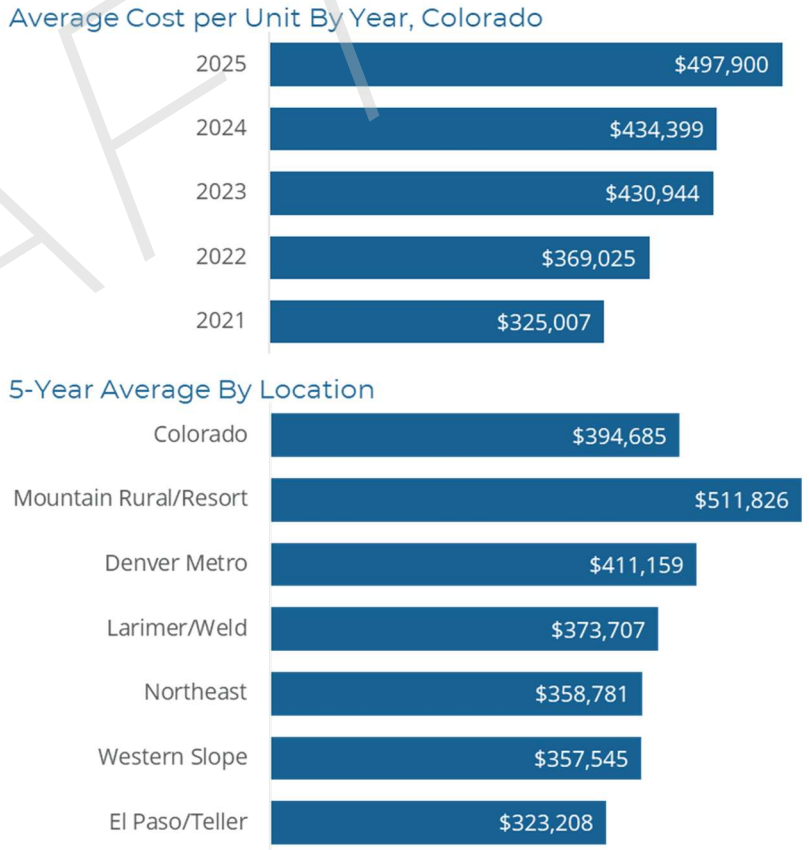
Figure IX-1. Census New Multifamily Construction Price Index, United States, 2005-2025 (Q3)



Source: Census Bureau.

According to data from the Colorado Housing and Finance Authority (CHFA), the average development cost of affordable multifamily rental housing in Colorado was $497,900 per unit in 20245 up from $325,000 per unit in 2021). The five-year average (2020-2025) for Northern Colorado (Larimer and Weld counties) is $374,000 per unit—just under the statewide five-year average.

Figure IX-2. Affordable Housing Construction Costs



Notes: Includes both 4% and 9% LIHTC deals. Annual cost data are not available by region.

Source: CHFA Affordable Housing Development Cost Dashboard.

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Though these costs are derived from affordable projects, they provide context as a baseline on market-rate multifamily development and trends in construction cost escalation more broadly.

Single family construction costs. Single family construction costs have also risen dramatically, as shown by the Census Bureau's New Construction Cost Index for single family homes in Figure IX-3. In the West Region, which includes Colorado, the single family construction cost index increased by 111% since 2010 and by 36% since 2020.

The National Association of Home Builders (NAHB) provides the most comprehensive data on all components of single-family residential development, though estimates are national, as opposed to regional/local.

As shown in Figure IX-4, the biggest driver in the upward shift in development costs is construction hard costs including both labor and materials. The most recent survey (2024 data)[1] show the average cost of new construction (before sales commission and builder profit) to be nearly $573,000 in the U.S. (nationwide).

Figure IX-3. Census New Single Family Construction Price Index, United States, 2005-2025

Source:

Census Bureau.

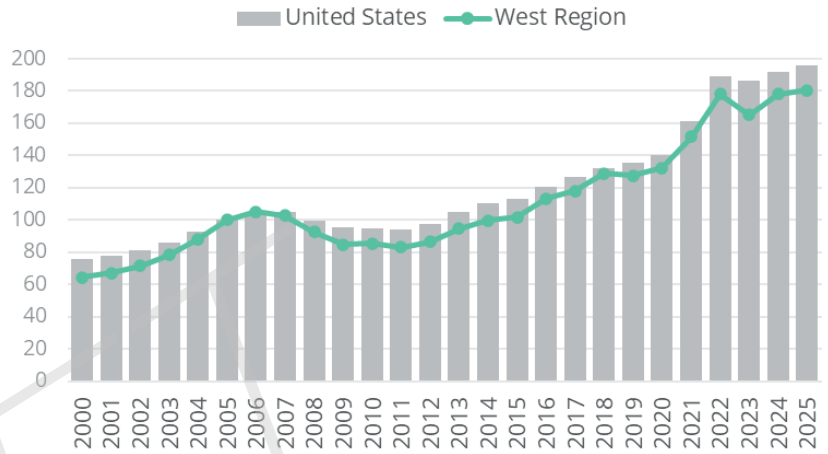
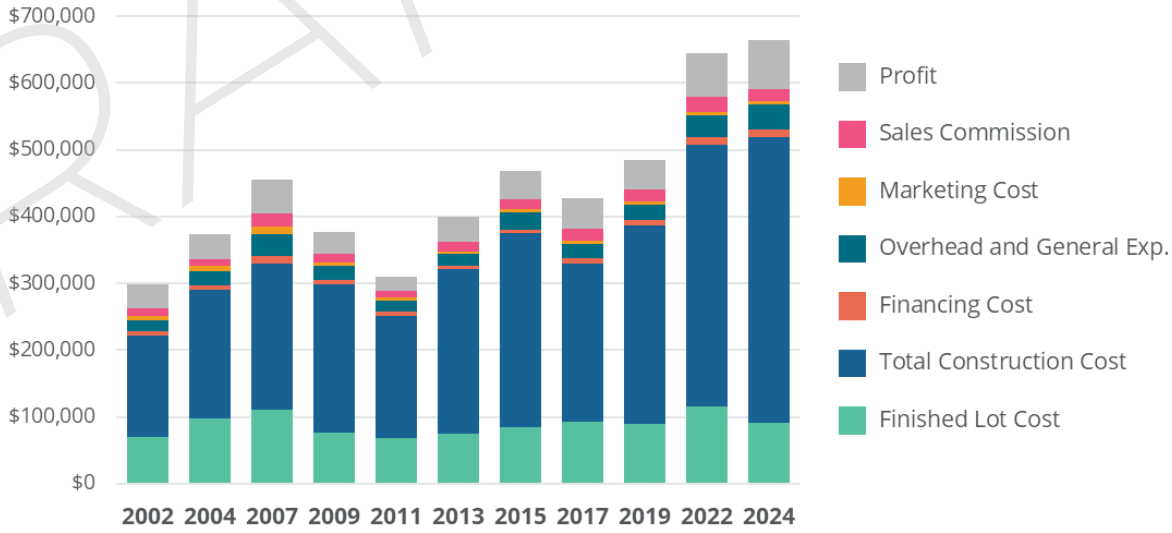


Figure IX-4. NAHB Construction Cost Survey, United States, 2002–2024



Source: National Association of Home Builders (NAHB) and Root Policy Research.

[1] https://www.nahb.org/-/media/NAHB/news-and-economics/docs/housing-economics-plus/special-studies/2025/special-study-cost-of-constructing-a-home-2024-january-2025.pdf?rev=00a42a1ce63b4a22a4dba9bda8af954b

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SECT. IX. BARRIERS, OPPORTUNITIES, & RECOMMENDATIONS

Stakeholder perceptions of barriers to affordable development. As discussed in Section VI, Root conducted a focus group with developers and real estate professionals to inform the regional HNA. Developers and planners emphasized that while state policy reforms like the removal of parking requirements for multifamily residential (HB24-1304) and allowance of ADUs anywhere single-family homes are zoned (HB24-1152) have eased some regulatory barriers, financing and public perception remain obstacles.

Market barriers. Land cost, labor, and availability/cost of water are significant contributors to development costs in Northern Colorado. Rising interest rates also pose a challenge—high development costs were somewhat manageable when the cost of capital was low (2020 and 2021), but as the cost of debt increases, it becomes much more challenging to get development projects to pencil.

High demand, coupled with lagging housing production and the high cost of delivering housing makes it difficult for the market alone to address the community's housing challenges.

Policy barriers. All three jurisdictional partners: Larimer County, Loveland, and Fort Collins have taken steps to evaluate zoning barriers that restrict development and are working to increase housing diversity and streamline approvals for affordable development. Loveland and Fort Collins also both offer fee waivers/rebates for affordable units. Recent state legislation allowing ADUs and revising occupancy limits (which forced a repeal of Fort Collins' "you plus 2" limits) has also increased housing choice and options. Even so, developers identified process delays, fees, and zoning constraints in some areas. In Loveland, density allowances in the comprehensive plan are extremely low (generally under 4 units per acre) which limits product diversity and smaller lots. Other barriers include the complexity of the Unified Development Code (UDC), lot dimensional standards, and infrastructure requirements that do not align with small lot market trends. Standards for lots, such as width, setbacks, and lot sizes are currently being addressed with adjustments for Prop 123 and small lot infrastructure standards are also under review. In unincorporated areas, infrastructure constraints are also a barrier to development.

Community opposition. Another recurring barrier is community opposition to affordable housing. Stakeholders in both Loveland and Fort Collins reported persistent NIMBY ("Not in My Backyard") resistance driven by fears about traffic, property values, neighborhood character, and loss of open space. Several stakeholders reported that even modest infill or multifamily proposals trigger strong backlash, often delaying or derailing projects.

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SECT. IX. BARRIERS, OPPORTUNITIES, & RECOMMENDATIONS

HOUSING RESOURCES

This section focuses on identifying and evaluating the resources available to support the development, maintenance, and accessibility of housing that is affordable for resident and employee households. Larimer County, as a whole, has a strong network of service providers and housing-related non-profit organizations, though financial resources for housing supports are limited.

The County annually compiles a comprehensive list of housing resources, available online in both English and Spanish: https://www.larimer.gov/sites/default/files/ohs-2025-resource-guideaug2025.pdf While the resource guide outlines a host of services and programs available for residents, the section below focuses on financial resources and partners to provide context for the service delivery system.

Financial resources. Both Loveland and Fort Collins receive state and federal resources dedicated to housing and community development (e.g., Community Development Block Grant funding, HOME Investment Partnership funding, and State Private Activity Bonds). However, there is no such dedicated revenue stream for housing services in smaller jurisdictions and unincorporated areas. Fort Collins also has sales tax dedicated to affordable housing. Loveland historically dedicated about $450,000 in General Funds to housing but that allocation was not renewed in 2025. The County does provide funding for housing staff, but programs are reliant on grants or occasional allocations (e.g., County Commissioners recently allocated unexpected oil and gas revenue to housing efforts). All jurisdictions were able to take advantage of ARPA funding to address acute needs in recent years, but without a new revenue stream those efforts will sunset.

Publicly owned land (for development). Fort Collins has an established land bank program that currently holds five parcels totaling about 45 acres for the future development of affordable housing. Two prior parcels have been sold or donated to develop affordable housing. Most recently, the City partnered with a developer and a community land trust to build 54 permanently affordable for-sale townhomes (priced around $290,000).

Fort Collins Downtown Development Association partnered with the local housing authority, Housing Catalyst, by providing land under a 99-year lease for 79 units of work force housing that opened in January 2023. These two partners are looking for more ways to leverage publicly owned land.

Larimer County has also made efforts to leverage land assets for affordable housing, donating a parcel to the City of Loveland that could be an opportunity for future development.

Housing authorities and other partners. The County has four active Public Housing Authorities, which serve specific municipalities but can also make Housing Choice Vouchers available in unincorporated areas. These include the Estes Park Housing Authority, the Loveland Housing Authority, Housing Catalyst, and the Larimer County Housing Authority. These agencies receive federal funding through the U.S. Department of Housing and Urban Development (HUD) but also leverage Low Income Housing Tax Credits and Private Activity Bonds to increase the affordable housing supply in Larimer County. The State of Colorado also administers a housing voucher program, which can serve residents in unincorporated areas.

A number of other organizations in the county also work to increase or support affordable housing development and housing services

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SECT. IX. BARRIERS, OPPORTUNITIES, & RECOMMENDATIONS

including (but not limited to) Northern Colorado Continuum of Care, CARE Housing, Neighbor to Neighbor, Impact Development Fund, Habitat for Humanity, and Elevation Community Land Trust, GreenPath Debt Solutions, Catholic Charities, and others. Some of these are focused specifically within municipal borders, while others serve the entire county or the broader region of northern Colorado.

Proposition 123 commitments. Colorado voters approved the enactment of Proposition 123 (also known as "Prop 123") in 2022 to make funds available for local governments, nonprofits, community land trusts, and private entities for affordable housing projects. Funds may be provided for projects and programs in jurisdictions that have committed to increasing their affordable housing stock above their baseline amount—municipalities, counties, or tribes that have accepted commitment filings.

Larimer County, Fort Collins, and Loveland all made Prop 123 Commitments, which sets jurisdictional goals to increase the supply of affordable housing above their baseline amount by 3% per year for 3 years (from 2024-2026). Affordability goals/filings are below:

- Larimer County goal: 113 units (38 units/year) by end of year 2026;
- Fort Collins: 555 units (185 per year) by end of year 2026; and
- Loveland: 246 units (82 per year) by end of year 2026.

To be eligible to receive Prop 123 funds during the next funding cycle (2027), local jurisdictions must achieve affordability goals and adopt a fast-track development approval process for projects where 50% (or more) of the units are designated as affordable for households (at or below 60% AMI for rental and 100% AMI on for-sale).[2]

Resources to address homelessness. The Regional Homelessness Strategy Across Larimer County provides a shared vision and framework for a more coordinated response across Larimer County and Northern Colorado. In addition, both Loveland and Fort Collins provide a range of services for individuals experiencing homelessness. Even so, emergency shelter capacity in Larimer County is insufficient to meet current needs. According to the Homeless Strategy, "countywide, 334 emergency shelter beds—including congregate and voucher-based options—frequently operate at or near capacity… While planned expansion in Fort Collins will increase shelter capacity, the City of Loveland plans to close its shelters, and rural areas currently lack both traditional shelter and alternative overnight options."

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[2] Information on DOLA's requirements: Guidance on the Implementation of Expedited Review Requirements in Proposition 123.

SECT. IX. BARRIERS, OPPORTUNITIES, & RECOMMENDATIONS

ONGOING INITIATIVES BY JURISDICTION

Larimer County housing initiatives. Larimer County recognizes the growing need for affordable, quality housing to be available to all its residents. Based on the County's last HNA, the past five years of housing efforts have been guided by the following identified housing needs: 1) additional units, 2) starter homes for middle-income earners, 3) increase of diverse housing options, and 4) expansion of housing resources for older adults, mobile home park residents, unhoused individuals and families, and people with disabilities. The County works to address these priorities through regional coordination, land use code reform, and funding towards the expansion of housing resources across Larimer County.

The Larimer County Office of Housing Stability (OHS) carries forward housing strategy for the County. Updates from 2025 are highlighted below by priority area.

Regional Coordination:

- Northern Colorado Continuum of Care financial support and staff leadership.
- Larimer County's current 5-year Strategic Plan committee is working to coordinate regionally on land use issues to encourage affordable, attainable housing near transportation and jobs to encourage density in the Urban cores.
- Collaboration with housing authorities (Housing Catalyst, Loveland Housing Authority, Estes Park Housing Authority).
- Participated in the completion of the Larimer Regional Plan to Address Homelessness (led by Homeward Alliance, in partnership with the City of Fort Collins, the City of Loveland, the Town of Estes Park, United Way of Larimer County, and the Northern Colorado Continuum of Care). OHS has been asked to be the convener and accountability lead for the implementation phase. This Housing Stability Manager will organize the collective effort and develop ways to measure and communicate progress toward goals, without taking over any daily operations of the current response system.
- Proposition 123 Convening and legislative updates.
- Published the Larimer County Housing Resource Guide (available digitally and printed in both English and Spanish).
- Launched updated Countywide Housing Needs Assessment, in partnership with City of Fort Collins and City of Loveland. The HNA along with our first Housing Action Plan will be completed in 2026 and set Larimer County up to be the lead provider of statistics and evidence regarding housing needs across the county.
- In conjunction with the HNA, the County is leading buildout of a data dashboard that every jurisdiction in Larimer can use, encouraging aligned data to establish coordinated goals.

Land Use Code Reform to Preserve Affordable Housing:

- Certified by the State as an ADU supportive community. The County received a $105,000 grant to launch the ADU deed restriction program, which will launch in 2026 (in partnership with Community Development).
- Mobile Home Park Preservation Zone has been added to the Land Use Code, with Phase 2 implementation planned for 2026.
- Conducted outreach and education events with Mobile Home Parks about code compliance and permitting processes, and translated key documents in those departments into Spanish to improve accessibility. (The Housing Resource Specialist is a non-

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SECT. IX. BARRIERS, OPPORTUNITIES, & RECOMMENDATIONS

voting member of the Resident Council led by MiVoz, to stay engaged in MHP advocacy and identify gaps).

- Participated in the Community Foundation's Regional Alignment committee to help steer alignment of land use code and fast-track processes across the region.

Expansion of Housing Resources:

- Funded Neighbor to Neighbor to sustain Emergency Rent Assistance Program – helping 156 households avoid eviction.
- Funded Colorado Poverty Law Project, to expand their work throughout the entire County. They provide free legal representation and education to people at risk of eviction or experiencing issues with the CO habitability standard. They also provide Know Your Rights Training and assist many mobile home residents in understanding their rights and filing complaints with the State. Using their Larimer County grant, they assisted 181 Households with direct legal assistance and hosted 38 training sessions with over 634 attendees.
- 2025 was the last year of funding from Larimer County to the Loveland Housing Authority (LHA) for the Larimer Home Improvement Program (LHIP). Providing Emergency Grants and low interest loans to low-income homeowners throughout the County. They will not be funded by Larimer County in 2026, but the program will continue. LHA received 3 years of Proposition 123 funding and funding from the City of Loveland and the City of Fort Collins.
- 2025 was the last year Larimer County funded the HomeShare program. This program is focused on helping older adult homeowners earn extra income or help with household chores in exchange for providing an affordable room to rent in their homes. It improves the quality of life for both the older adult homeowner and the new renter. They will not be funded by Larimer County in 2026.
- Landlord Engagement. The goal of this program is to create new affordable rental units without building new units. This program builds bridges between people and housing to create a stronger Larimer. In 2025, the program administered 15 contracts with local property owners, resulting in over 50 local units and 88 LIHTC units listed in our system to partnering agencies. The program initiated 10 lease sign-ups, 10 education events, and reached over 85 unique landlords across the county.
- Created Lodging Tax Memorandum for leadership consideration in 2026.
- Awarded $130k of unanticipated Oil and Gas funds for Preservation of Imperial Homes, a set of three group homes serving individuals with disabilities who earn at or below 30% AMI. Funds were used to replace critical systems such as heating, roofing, and electrical repairs.

County Housing ARPA contributions:

- Heartside Hill (Multifamily Affordable Housing and Community Center);
- Fort Collins Habitat for Humanity (purchased lots that will be future Poudre Build homes);
- BirdWhistle (Fort Collin's first permanently affordable homeownership development);
- Medical Clinic for People Experiencing Homelessness (at the Murphy Center);
- Resident Acquisition of Nueva Vida (formerly Parklane Mobile Home Park);
- Fort Collins Rescue Mission 24/7 Shelter;

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- The Landing (Youth Shelter opened in Loveland in Jan 2025);
- Fish Hatchery Workforce Housing (in Estes Park);
- L'Arche (*still pending acquisition*; Communal housing for individuals with disabilities).

Loveland housing initiatives. In late 2020, the Loveland City Council tasked the Loveland Housing Authority with finding solutions to address housing affordability. By 2021, the Housing Authority formed the Loveland Affordable Housing Task Force, a group of private, public, and non-profit housing sector leaders alongside other concerned community members. In 2022, the Task Force proposed several recommendations, including zoning changes; partnerships with the private sector; a tiered fee structure for smaller units; a market-rate housing loan fund; and the establishment of a land bank. Through zoning incentives, fee reductions, and policy reforms, Loveland continues to work toward expanding access to affordable housing for residents.

Specific strategies to support affordable housing, include:

- Utilization of Low Income Housing Tax Credits and Private Activity Bonds for affordable development;
- Waivers or reductions in development, capital expansion, and building permit fees for affordable projects;
- Revisions to planning and zoning codes allowing homes as small as 400 square feet with minimal setbacks, and reduced parking requirements to promote affordability.
- Administrative increase in the number of units within existing Planned Unit Developments, allowing developers to add up to 30% more units.
- Change affordable housing designation AMI determinations
- Implement fast track affordable housing approvals (in compliance with Prop 123);
- ADU Friendly Community state designation; and
- Exploring mechanisms for new funding sources.

Development Incentives. The City of Loveland offers incentives for both for-rent and for-sale projects granted an affordable housing designation, including fee waivers, design flexibility and fast track review, and reduced parking requirements. The exact level of incentive depends on the level of affordability provided by a project, with the most incentives going to projects targeted at 60% AMI or below. In addition, for-sale projects must guarantee a 20-year deed restriction and multifamily projects must guarantee a 50-year deed restriction to gain the affordable housing designation.

Affordable Housing Fund. Loveland has had a Community Housing Development Fund (CHDF) since 2017 that generates approximately $450,000 annually. The CHDF is primarily used to subsidize fees that can't be waived on both for-rent and for-sale affordable housing projects, including Enterprise fees and Loveland Fire Rescue Authority fees. However the CHDF allocation will not be renewed going forward.

Fee study. In 2024, the City retained Economic & Planning Systems, Inc. (EPS) to conduct a housing fee study for the city, with the goal of making housing more affordable and better aligning household size with the fiscal impact on the City. The study resulted in the following recommendations to improve the feasibility of constructing affordable housing in the city. These recommendations are in various stages of implementation.

- Tier raw water costs into four categories to reflect a fee burden that is based on annual water usage (completed);

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SECT. IX. BARRIERS, OPPORTUNITIES, & RECOMMENDATIONS

- Change the Capital Expansion Fee (CEF) structure to provide relief for smaller housing products (fee study near completion); and
- Implement a fee waiver program (similar to the existing pilot program) to waive fees on designated affordable/attainable housing, similar to the pilot program in the Wilson Commons subdivision.

CDBG Fund use. The City of Loveland uses a formal grant allocation process to distribute CDBG funds. Organizations interested in applying for funding must submit a pre-application to ensure eligibility criteria are met. Full grant applications are reviewed by the Affordable Housing Commission for capital funding, brick and mortar projects. The Human Services Commission reviews and allocates funding for community service projects. At the end of the process, the two commissions make recommendations of how to allocate grant dollars to the Loveland City Council, which makes the final funding determination.

Over the past five years, the Affordable Housing Commission allocated CDBG funds to achieve key milestones: the development of 12 new single-family housing units, 54 housing units dedicated to transitioning residents out of homelessness, the rehabilitation of three single-family homes and 94 multi-family units, and the completion of three public facility projects. The Human Services Commission directed funding to provide case management services for thousands of Loveland residents. Achieved goals include housing to reduce homelessness and public facility rehabilitation. For unmet goals, service targets were revised.

Zoning initiatives. The City recently passed a code amendment t that removes parking requirements near certain transit stops and adjusts ADU standards to remove off-street parking requirements. Standards for lots, such as width, setbacks, and lot sizes are currently being addressed with adjustments for Prop 123 and small lot infrastructure standards are also under review.

Fort Collins housing initiatives. In 2021, the City of Fort Collins adopted a Housing Strategic Plan which encompasses strategies to address the entire housing spectrum from homelessness to market rate housing. It specifically incorporates the prior approved 2015-2019 Affordable Housing Strategic Plan (AHSP) priorities, which aimed at retaining and growing the City's affordable housing inventory. The Housing Strategic Plan includes 26 strategies and avenues for addressing the ongoing housing challenges in Fort Collins. While the plan is broad, the City continues to work under the guidance of the goals and strategies included in the AHSP for housing targeting lower income households. **This Plan envisions that everyone has healthy stable housing they can afford.**

The City is currently pursuing the following strategies:

- Continue to provide federal and City funds to housing developers to produce new and preserve existing affordable housing. Subsidies enable developers to produce rent-restricted units at below market rates.
- Seek to maintain or expand current levels of City funding for affordable housing, human and supportive services.
- Expand funding sources. A dedicated sales tax was passed in 2015, providing $4 million over 10 years to be used for affordable housing construction and/ or preservation. Voters renewed this sales tax in 2025 and increased the amount allocated to affordable housing to $10 million over the next 10 years. Fort Collins City Council also directed $5 million in unspent 2015 funds to affordable housing development. The City has been approved to participate in Proposition 123, which created a housing funding source at the state level. To date, nearly $5 million in Proposition 123 funds has been allocated to Fort Collins in less than 2 years.

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- Remove obstacles and reduce approval timelines for subsidized housing development. Starting in 2027, an expedited review process for affordable housing will also be required as part of compliance with Proposition 123. Affordable projects will be required to receive a decision within 90 days of project submittal. Staff are already working on improvements to processes to work toward this goal.

- Refine and expand development incentives. The City is currently implementing and monitoring changes to the Land Use Code (LUC) regulations to remove obstacles to affordable housing development, increase housing supply across the spectrum, and improve housing variety and choice.

- Partner to support workforce housing. The City seeks to increase partnerships with local employers to provide workforce housing. The City has several projects with Elevation Community Land Trust (ECLT), a state-wide philanthropy- funded land trust, with the mission of providing permanently affordable homeownership opportunities. ECLT has purchased public housing units and is converting them to permanently affordable for-sale homes. ECLT has also purchased the BirdWhistle Townhomes and is selling individual homes to qualifying buyers. The City conducted a study of employer sponsored housing benefits to explore what could be done to support the City's workforce as well as the City's residents.

- Strategically release the City's Land Bank properties for development of affordable rental and ownership housing. Partnerships with developers aim to maximize the resource of the Land Bank parcels for affordable housing development and reinvest proceeds from the sale of existing parcels into new land holdings. The Land Bank Program added a new property in 2025 and plans to purchase another 5 acres of land in 2026. The City expects to exercise this option and purchase the 5 acres in 2025. The other option' s term runs through 2026.

- Build internal City capacity to support affordable housing. The City created an Internal Housing Task Force to seek enterprise-wide efforts to promote and incentivize affordable housing. The City added an Affordable Housing Executive team and has hired a data specialist.

- Complete regional collaborative projects. A benefit of the COVID-19 pandemic was that multiple levels of government worked together to coordinate their approach to response and recovery. The City was active in passing recovery funds to partners through granting procedures already in place. ARPA funding was committed to the Capital needs of two new affordable housing developments and provides emergency response, such as eviction prevention assistance.

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RECOMMENDATIONS

This section identifies policy and programmatic responses available to Larimer County, the City of Loveland, and the City of Fort Collins to address housing needs identified in the regional Housing Needs Assessment. The recommendations below help set the stage for future Housing Action Plans, which require at least two "standard affordability strategies" and at least one "long-term affordability strategy."

Recommendations are designed to achieve an integrated approach that **leverages key partners and financial assets (both land and funds) to create housing that serves current and future residents, preserve existing affordability; and assist low-income households:**

1. Continue regional collaboration and public-private partnerships.
2. Consider funding source options.
3. Allocate publicly owned land to affordable/mixed income development.
4. Preserve existing housing (serving low and moderate income households).
5. Implement land use and zoning modifications (to unlock supply and improve housing diversity).
6. Refine or expand development incentives for affordable housing.
7. Assist and stabilize existing households through program support.

The remainder of this section provides details and action items for reach recommendation.

1. Continue to collaborate with regional partners on housing needs, funding, and service delivery. Because housing needs extend across jurisdictional boundaries, Larimer County, Loveland and Fort Collins should continue to participate in and support efforts to advance regional housing efforts and funding. Continued regional collaboration allows jurisdictions to present a unified approach to the housing issues identified in the Housing Needs Assessment, defines common goals, and promotes efficiency in resource allocations.

Public-private partnerships are also important to the success of delivering affordable housing. Common public-private partnerships typically center around public investment in development projects for affordability but additional opportunities to create/improve efficiencies in housing delivery may exist with the business community, Chambers of Commerce, colleges and universities, and economic development agencies. Some examples of pairing economic development with housing include economic development programs/incentives for innovative construction methods that reduce building costs and/or pairing housing investments with major commercial developments.

Recommended actions:

- ***All:*** Continue current municipal/county collaboration but also expand efforts, where appropriate, to include collaboration with Weld County and its communities on regional approaches (in addition to the Current Continuum of Care (CoC) work).
- ***All:*** Support implementation of the Regional Homelessness Strategy Across Larimer County.

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- ***All:*** Continue to cultivate public-private partnerships to achieve housing goals.
- ***All:*** Identify potential collaborations—particularly between the county and cities to achieve Prop 123 goals.
- ***Larimer County:*** Take the lead on convening, data sharing, and resource alignment. This could include developing a data dashboard, collaborating on prop 123, and outreach/education through the Housing Summit.

2. Create new dedicated, sustainable revenue sources to support affordable housing development and services.

Dedicated local funds for affordable housing production, preservation, and programs (or a "Housing Trust Fund") can have a high impact on housing needs. Revenue from local sources vary widely but can include General Obligation Bonds, commercial and/or residential linkage fees, sales tax, property tax, general fund allocations, and other taxes directly tied to housing demand.

Local funds are particularly effective for affordable housing development projects because they provide a sustainable and flexible funding source without federal or state regulations. Fee revenue can be used for gap financing of low-income housing projects, land banking, development incentives or subsidies (such as fee or tax rebates), and/or leveraging state and federal funding that requires a local match. Dedicated funds—as opposed to discretionary allocations—have the added benefit of dependable future revenue, which protects funding from shifting politics AND allows a City/County to bond against the revenue, which can support up-front costs of major housing investments. The biggest challenge for most communities in creating a dedicated funding source is lack of political support for meaningful sources.

The City of Fort Collins is the only participating jurisdiction with a dedicated housing revenue stream. Even with existing dedicated sources, the needs outweigh available resources. Financial resources to address housing affordability needs elsewhere in Larimer County are primarily reliant on state and federal grants. As it stands, these sources are insufficient to fully address the housing needs identified in the HNA.

Recommended actions:

- ***All:*** Study potential local funding tools and determine the most appropriate and politically viable source of funds. This could include evaluating funding streams for housing projects in peer cities/communities.
- ***County:*** Explore a lodging tax that could fund housing programs.[3]
- ***All:*** Track state legislation that may remove barriers to using General Fund (property tax) revenue on affordable housing (SB26-001).
- ***All:*** Explore the potential benefits of additional HUD entitlement grants through a HOME consortium.
- ***All:*** Continue to monitor funding gaps in housing service provision to evaluate the financial needs that cannot be fulfilled through existing funding sources. This is particularly important if/as federal funds shift.

[3] County examples of other dedicated tax streams for housing include: dedicated property tax in Denver and Boulder counties; and dedicated sales tax in Denver, Pitkin, Summit, and San Miguel counties.

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3. Continue to allocate publicly owned land (and/or acquire vacant or underutilized properties) for affordable and mixed-income housing. Property acquisition costs are a central component of the cost of developing affordable housing. The County, Cities, and other public entities (e.g., school district, state entities, etc.) own properties that could reduce costs and facilitate the production of affordable and mixed-income units. Though much of this property is already utilized for public facilities (or is inappropriate for residential development), there may be opportunities to create affordable units through strategic utilization of publicly owned property.

Many local governments donate, discount, or lease vacant land or underutilized properties (e.g., closed schools, vacant or out-of-date public sector offices) for residential mixed-income or mixed-used developments through land bank/land donation programs. Essentially, cities acquire properties which are held in a "land bank" and redeveloped by nonprofit or private developers. Land from the bank can be donated, discounted, or offered on a land lease to the selected developer who agrees to an affordability level or community benefit. This process is typically started by creating an inventory of existing public land that could be used for future housing sites. Land banking can also be used as a long-term preservation strategy, and a mechanism to help develop additional financial assets for future affordable housing needs.

As discussed earlier in this section, all of the participating local governments are already engaged at varying levels in this effort; Fort Collins has the most developed approach with a formal land bank. In order to expand ongoing efforts and evaluate future opportunities, Root recommends the following actions:

Recommended actions:

- ***Larimer County and Loveland:*** Develop an inventory of existing publicly available land (including land already identified in the Inventory of Non-developed State-owned land[4]) and study the feasibility of residential development as well as any public process barriers related to property acquisition and disposition.
- ***Fort Collins:*** Continue development of the city's Real Estate Strategy to prioritize uses and target investments.
- ***All:*** Actively maintain partnerships with mission-driven or community-oriented land owners, such as school districts, religious groups and churches, and nonprofit/affordable developers.
- ***All:*** Consider conducting site-specific analyses to inform the development review process.
- ***All:*** Watch for property and land that can be acquired and redeveloped. This could include vacant land, underutilized/vacant commercial, and/or small naturally occurring affordable multifamily housing.

4. Invest in the preservation of housing and properties serving low and moderate income households. There are two different submarkets of rental properties serving existing low- and moderate-income households in Larimer County: income-restricted properties and naturally occurring affordable housing, or NOAH. Preservation efforts are needed when the affordability contracts on income-restricted units are set to expire and when NOAH is under

[4] https://doh.colorado.gov/inventory-of-non-developed-state-owned-land

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market pressure to raise rents beyond what low-income households can afford or when NOAH is for sale (especially to corporate investors).

Preservation is an attractive strategy because it utilizes existing housing stock and is not bound by the timeline and cost of new construction. However, preservation of NOAH can be a challenge because it is driven by market opportunities and owned by private landlords—in other words, Cities/Counties have no control over rents.

Expiring affordability contracts. Just over 1,300 rental units in Larimer County have federal subsidies contracts that will expire by 2035 (see Section III). This means that property owners will have the option to convert units to market-rate housing. With rentals in high demand, it is increasingly likely that affordability contracts held by private companies (rather than non-profits) will not be renewed after they expire—resulting in fewer affordable units and more households vulnerable to displacement/housing instability.

The most common form of preservation for expiring subsidies is to provide funding to non-profits for acquisition (and rehabilitation if needed) of the properties in exchange for long-term affordability. Financial resources can be allocated for activities including the identification of expiring properties, outreach and education, and/or funds to incentivize participation.

Naturally occurring affordable housing. NOAH refers to housing that does not have income restrictions but generally serves lower and moderate income households through "naturally" affordable rents and home prices. It generally reflects older apartments, smaller and attached for-sale homes, and/or manufactured housing (e.g., mobile homes). This critical segment of the market constitutes a large portion of the housing stock but can be challenging to preserve through policy tools because the units are privately held. NOAH preservation strategies are typically designed to incentivize property owners to institute affordability contracts in exchange for financial assistance to make needed repairs or improvements to their units and properties.

Mobile/manufactured homes as a form of NOAH. Mobile or manufactured home communities (MHPs) are a unique form of NOAH as they offer an affordable option but also come with unique vulnerabilities tied to lower construction standards and owning the structure but renting the lot on which it stands. Preservation efforts for this housing type in the face of redevelopment pressures can include:

- Zoning protection and accompanying building code revisions to address and accommodate the unique structural and policy needs of MHs and their low-income owners;
- Preserving affordability within MHPs (through grants, loans, and services for infrastructure improvements, home repairs, and home replacements); and
- Preventing displacement of residents by providing or facilitating acquisition of grants/loans for resident or nonprofit ownership. After resident, nonprofit, or government purchases, lot rents rarely increase more than 2% per year, preserving stability.[5]

Recommended actions:

- ***County:*** Maintain a database of income restricted housing properties including affordability periods, expiration timelines, ownership entities, and other data to help City/County staff and partners identify opportunities for preservation programs. This could include investment in software to help track deed restrictions and expiration timelines.

[5] Based on data from ROCUSA https://rocusa.org/

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- ***All:*** Partner with local non-profits, housing providers, affordable developers, and other entities who could be able to acquire expiring income-restricted properties and units.
- ***All:*** Contingent on available resources, dedicate funds to support acquisition/rehabilitation that renews affordability contracts (e.g., PAB funds paired with 4% LIHTC could be a source for this).
- ***All:*** Evaluate opportunities to preserve NOAH, including:
  - Identify model preservation programs and interview program staff to evaluate the feasibility of similar programs.
  - If/as funding allows, design a program that offers rehabilitation grants and/or loans for needed repairs in exchange for limits on rent increases.
  - Develop an outreach and education program for property owners on preservation options and financing tools.
- ***All:*** Evaluate policy and program options to support residents of Mobile Homes (MH) and Manufactured Housing Communities (Mobile Home Parks, or MHPs), such as:
  - Support resident ownership of MHPs, as opportunities arise, through funding and technical assistance for resident acquisition.
  - Provide infrastructure and/or property improvements to MHPs in exchange for affordable lot rents (or limits on lot rent increases).
  - Maintain zoning and density that accommodates MHPs (all jurisdictions have explicit MHP zoning currently—this recommendation is to maintain such zoning).
  - Track and pursue expanding opportunities to apply for MH and MHP-related federal funding from HUD, such as the Preservation and Reinvestment Initiative for Community Enhancement (PRICE)—a competitive grant fund for the preservation and revitalization of manufactured housing and eligible manufactured housing communities—as well as other funding sources.

5. Implement land use and zoning modifications to unlock supply and improve housing diversity. Land use and zoning reform (or modification) is a common practice to increase housing supply and improve natural affordability and housing diversity. While regulatory reforms cannot fully address needs across the housing continuum, it is an important tool for many local governments to allow the housing market to keep pace with the county's growing economy and create opportunities for more diverse product types and naturally affordable housing options.

A significant benefit of land use regulatory reforms is that they can be implemented without additional financial resources—though they may require political capital and/or staff capacity. Some best practice zoning reforms include:

- Allow accessory dwelling units (ADUs) by right in agricultural, single family, and two-family uses (subject to lot and/or occupancy requirements).
- Zone more land for multi-family.
- Allow more types of housing in single-family zones—especially duplexes.
- Allow medium density housing (10 dwellings per acre, or du/a) in 10% of land area.
- Allow administrative approvals of small multifamily or affordable projects.

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- Lower minimum lot size for single-family.
- Increase lot coverage limits.
- Allow conversion of commercial and office buildings to multi-family housing as appropriate.
- Create opportunity for modular solutions through local accommodations and state advocacy.

All participating jurisdictions have made some efforts to reduce regulatory burden and increase housing diversity through zoning modifications (as discussed earlier in this section). However, there remain opportunities for continued improvement:

Recommended actions:

- ***County:*** Increase awareness of zoning code changes and support and implementation and uptake (e.g., the new Larimer ADU deed restriction program).
- ***County:*** Identify best practices related to workforce/seasonal housing development on agricultural land.
- ***All:*** Monitor the impact of recent code changes that allow more diversity and make adjustments to policies as needed. Continue to evaluate improvements to zoning code for best practice alignment.

6. Refine and expand development incentives to increase the production of affordable (income-restricted) housing developments. In general, development incentives offer variances from entitlement zoning (or relief from development fees) in exchange for including affordable units in the development. Incentives can take several forms:

- Process-oriented development incentives, such as fast track or administrative approvals, which indirectly lower predevelopment costs by reducing risk, reducing redesigns, and reducing the amount of time (and interest) a developer will have to use bridge financing prior to closing.
- Regulatory incentives that allow for more units to be built than allowed by right by current zoning regulations (e.g., density or height bonuses), which improve land efficiency and allow for a more cost-efficient product.
- Financial incentives, such as in-kind donations, fee reductions/rebates, or tax incentives for affordable developments, which directly lower the cost of construction.

Incentives can be used both to encourage market-rate developers to include a small proportion of affordable units and/or to improve the development economics and process for projects with a large proportion of affordable units (e.g., LIHTC developments). Most incentive policies mandate set asides of at least 10%-20% of units affordable to 50% to 80% of AMI on rentals or up to 120% AMI on for-sale, depending on the local housing market. Affordability periods can range from 15 to 99 years (the average length of time for deed restrictions is 30 years). Many cities offer tiered incentives that scale with the set-aside—offering deeper incentives to developments that are majority affordable than to those with 10% of unit affordable.

Loveland and Fort Collins both have a variety of financial and regulatory incentives for affordable housing and Larimer County has already implemented a fast track review for affordable developments. Thus the recommendations below focus on ways to continue success and expand and refine incentives as needed.

Recommended actions:

- ***Loveland and Fort Collins:*** Finalize and implement a "fast-track" development process for affordable housing projects.

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- ***County:*** Evaluate opportunities to catalyze or subsidize infrastructure investments in rural areas that will support needed affordable workforce projects in target areas.

- ***All:*** Continue to monitor and evaluate the use and impact of incentives and refine existing programs as needed to support affordable development.

- ***All:*** Conduct stakeholder outreach with affordable and market-rate developers to identify additional incentives (or modifications to existing incentives) that could help affordable developers maximize their potential and that could stimulate additional affordable development.

7. Stabilize existing households through programs for low-income residents, special needs populations, and people experiencing homelessness. While there are a wide range of community resources, services, and programs available to meet the unique needs of individuals and households in the County, the needs far exceed resource availability. Housing supports can include accessibility improvements, support for aging in place, tailored programs for people experiencing homelessness, emergency rental assistance, emergency home repair and/or weatherization, housing counseling, landlord-tenant mediation services, eviction and foreclosure prevention, etc. A key role for the Cities and County may be to improve access and awareness of programs, convene service providers for regular collaboration, and provide funding for housing services.

Recommended actions:

- ***All:*** Continue to make strategic investments in programs that are stabilizing households and addressing critical needs. In doing so, continue to monitor needs and resource gaps to inform program investments while acknowledging current resource constraints.

- ***All:*** Continue (and expand as possible) existing successful programs (e.g., rental assistance, eviction protection, and landlord incentives).

- ***All:*** Support accessibility programs and other services that create opportunities for seniors to age in place, preserving their existing home as a viable housing option.

- ***All:*** Support implementation of the Regional Homelessness Strategy Across Larimer County.

- ***All:*** Continue to promote education and awareness of existing programs (e.g., ensure eligible homeowners are informed about the tax relief programs).

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Larimer County

REGIONAL HOUSING NEEDS ASSESSMENT

ROOT POLICY RESEARCH

PRESENTED BY

Mollie Fitzpatrick, *Managing Director*

Project Objective: Better understand current and future housing needs in Larimer County and its communities—as well as comply with SB24-174 (unlocks state funding preferences). HNA will inform future Housing Action Plans for Larimer County, Loveland, and Fort Collins.



Larimer County HNA: Project Overview

Methodology and Terminology

- **Data sources:** The report (and presentation) rely on the U.S. Census Bureau's American Community Survey (ACS) data and state demographer estimates as well as market sources such as CoStar, Zillow Analytics, and Assessor sale reports. At the time the research was conducted, the most recent ACS data available were 2023. (ACS is the only data source for reported resident incomes and certain housing stock and market metrics).

- **Geography:** participating jurisdictions are Larimer County, Loveland, and Fort Collins. Where possible we include data specific to unincorporated areas and for other incorporated areas within the county. References to "Larimer County" mean the county as a whole.

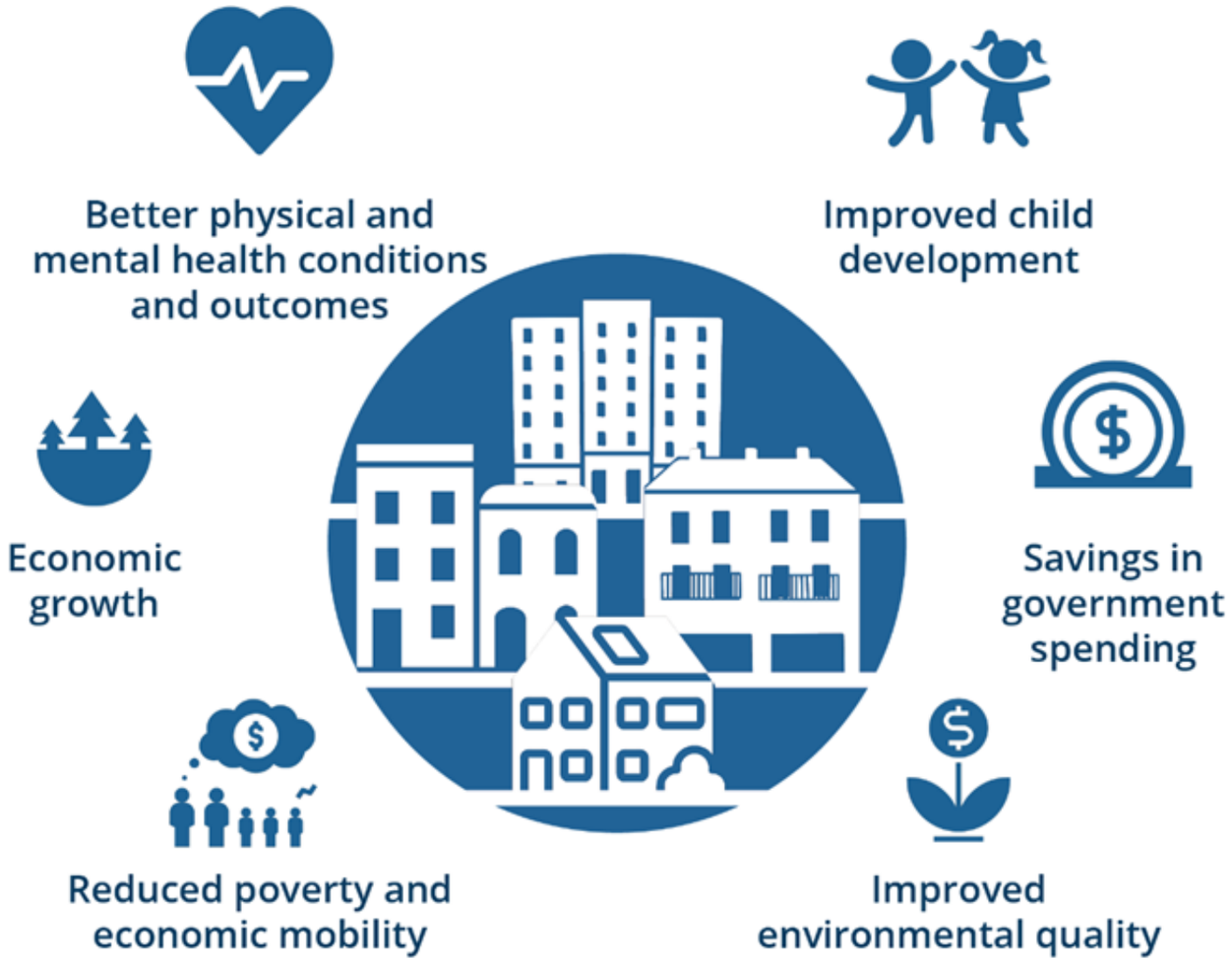
- **Affordability:** Industry standards consider housing affordable when the housing payment—the rent or mortgage payment plus taxes and utilities—consumes 30% or less of a household's gross income.



- **Area Median Income (AMI):** The HNA uses both household income ranges and "Area Median Income (AMI)." AMI is a measure of income based on the median, or middle income household. Housing programs base program eligibility on income limits that are represented as percentages of AMI (published by HUD by region and household size). 100% AMI for a 2-person household is about $100,000.

Why work to address housing needs?

A balanced housing stock accommodates a full “life cycle community”—where there are affordable housing options for residents of all stages of life from career starters to centenarians—which in turn supports the local economy and contributes to Larimer County’s culture and community.



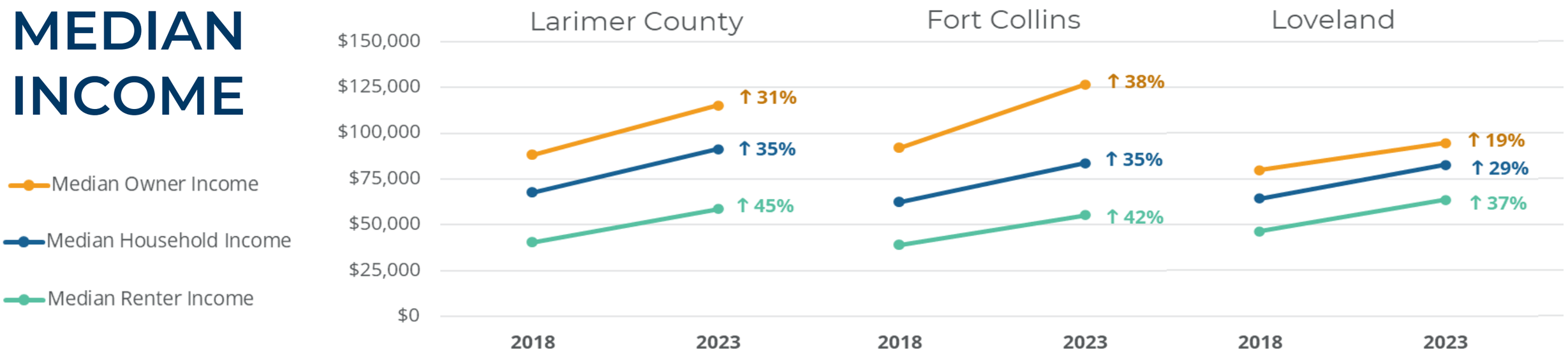
Demographic and Economic Trends

Forecasted growth, aging population, and rising incomes but declining rates of homeownership for income levels that have historically been entry-level buyers (household incomes $50,000 to $100,000).

KEY TRENDS IMPACTING HOUSING CHOICE

- Steady growth with an aging population (17% are over 65).
- Decline in homeownership, particularly for households with income $50,000 - $100,000.
- Rising wages and rising incomes for renters and owners—outpacing inflation but lagging home prices.
- Both in-commuting and out-commuting have increased slightly over the last 5 years, though a majority (60%) live and work in-county.
- Increase in share working from home (19% in 2023 up from 8% in 2019)

MEDIAN INCOME

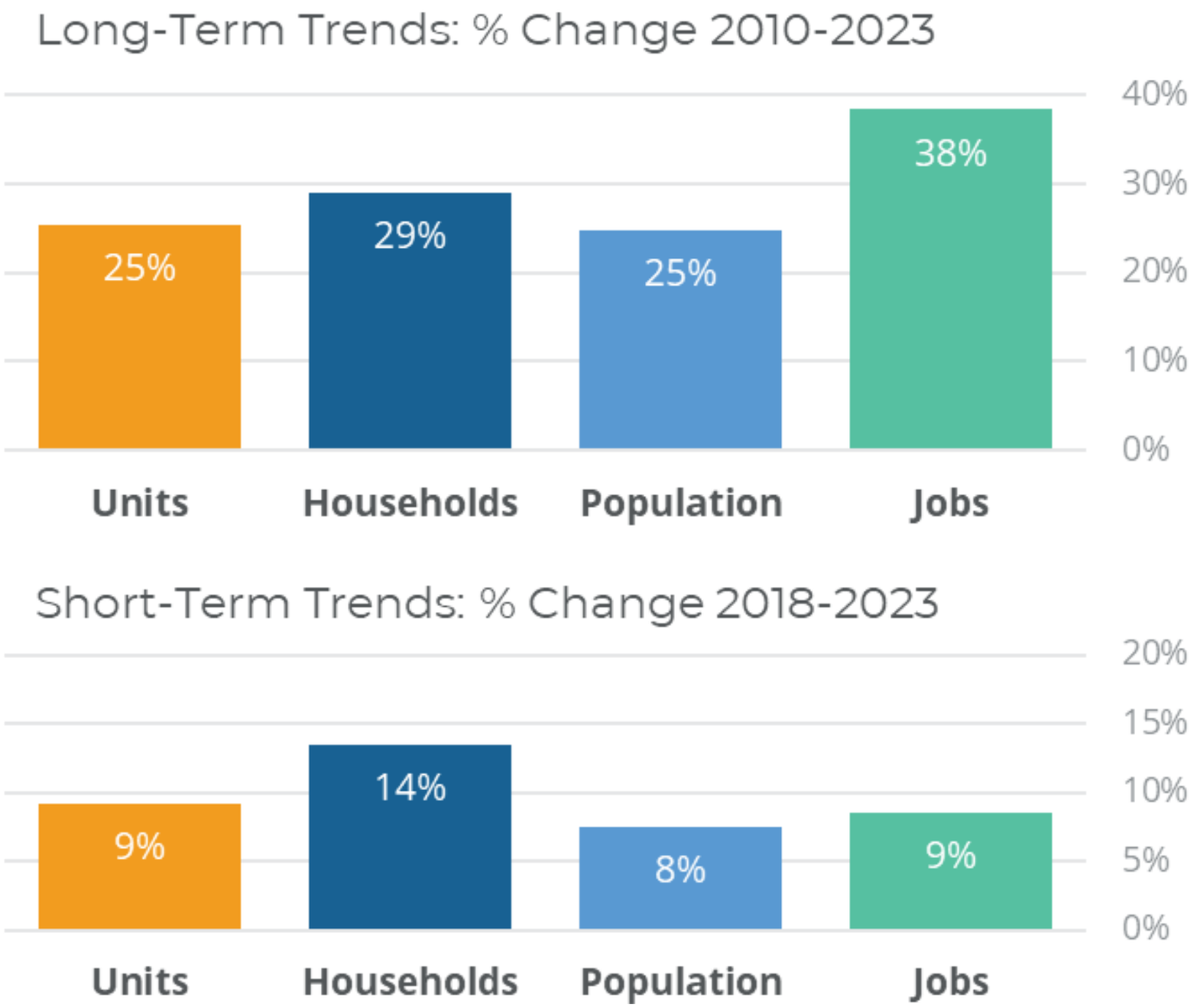


Housing Stock and Market Trends

Housing production keeping pace with population and job growth (after a period of undersupply). Steep price and rent increases—with some softening in the last 2 years—outpace wages and inflation and lead to and losses in naturally occurring affordable housing.

Housing Production

Long-term trends in the county (2010-2023) show economic growth outpacing housing production, but more recent trends (2018-2023) indicate housing production is on pace with job growth , though still lagging growth in households.

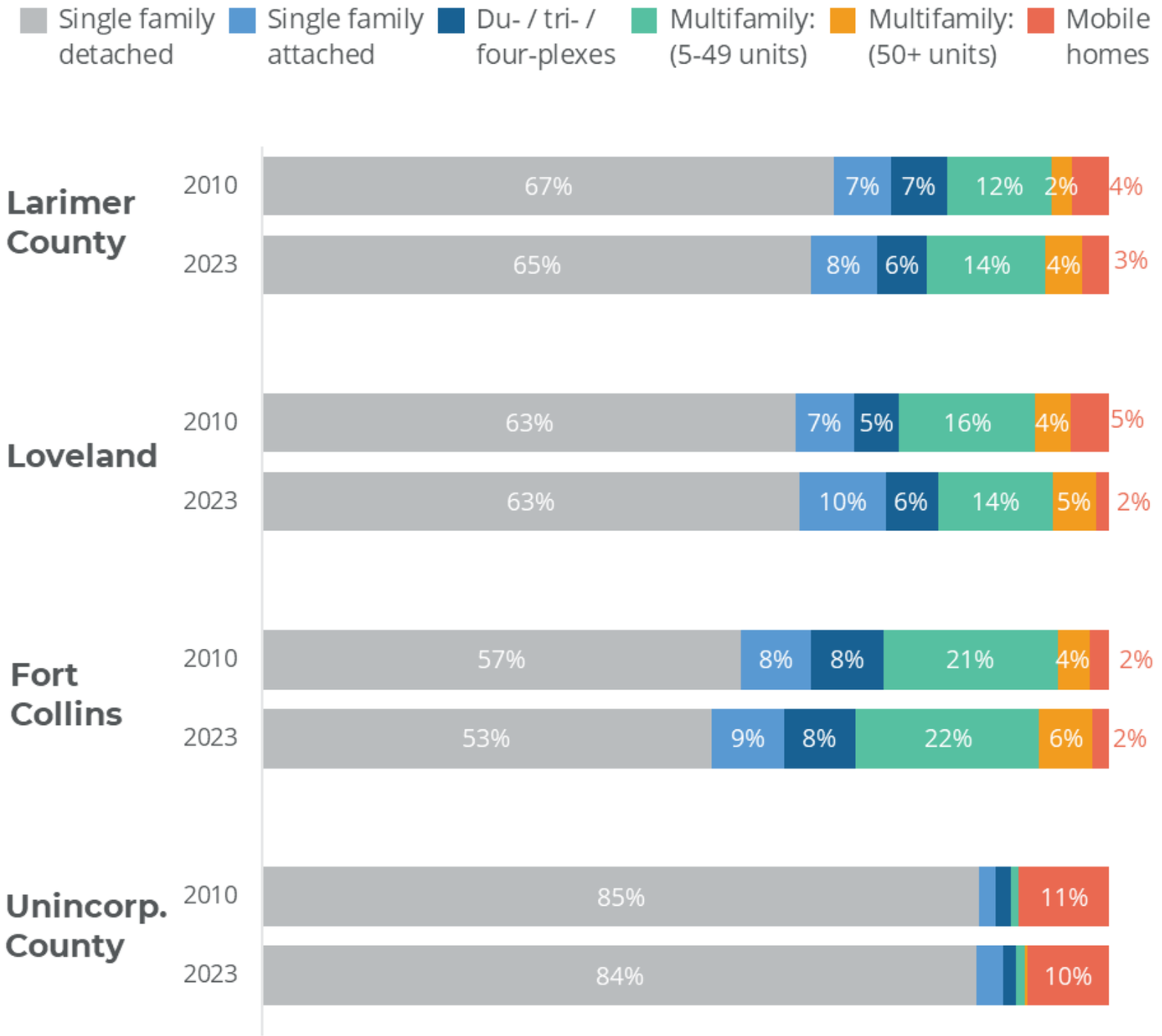


Percent Change in Housing Units vs. Households, Population, and Jobs, Larimer County

Source: ACS, Dola, and Root Policy Research

Housing Type

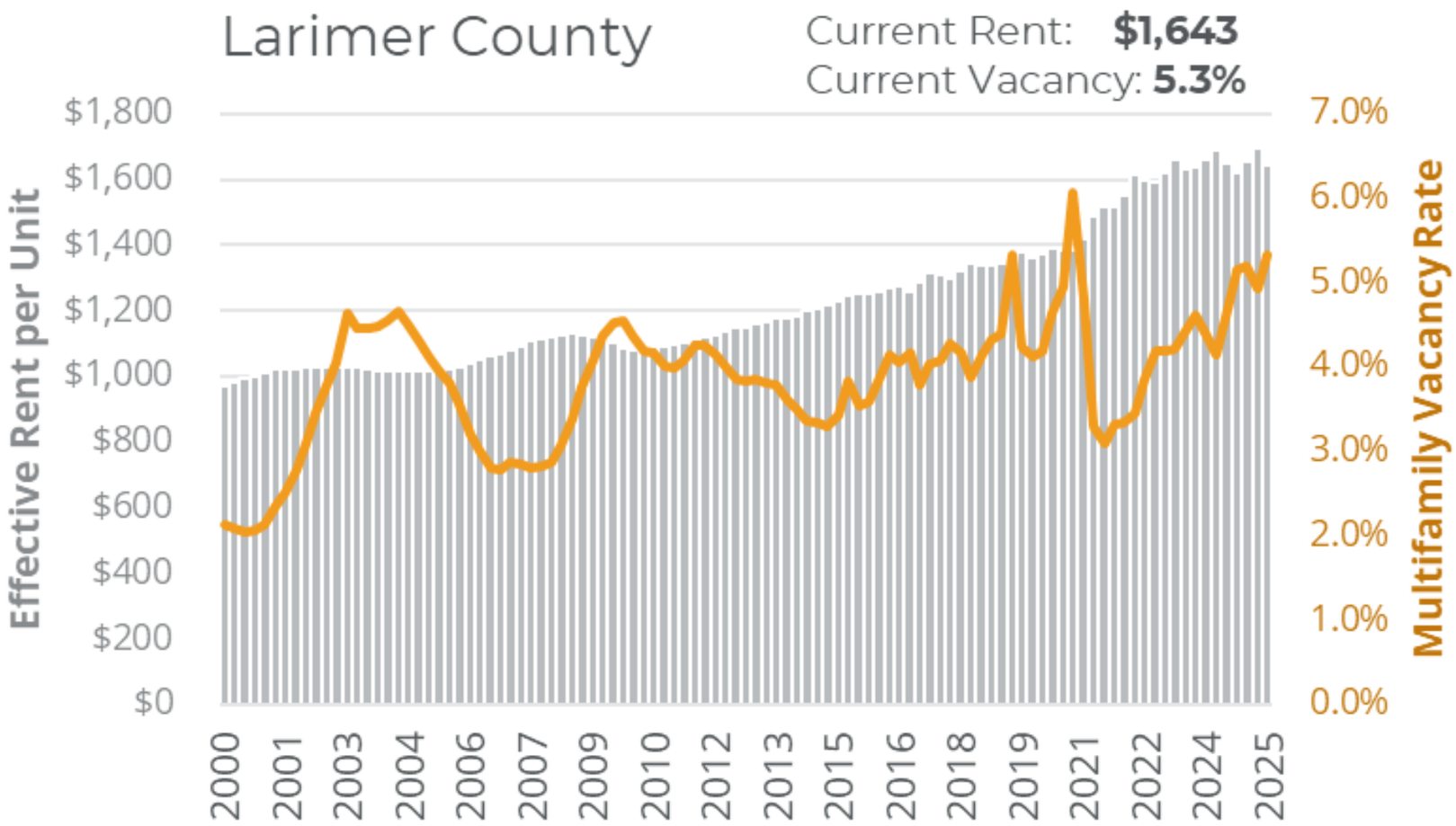
Housing stock composition in the county shifted slightly since 2010 as single family detached homes have become a smaller proportion of the overall stock, though they still constitute a strong majority of homes (65%).



Units in Structure, 2010 and 2023 | Source: ACS and Root Policy Research

Rental Market

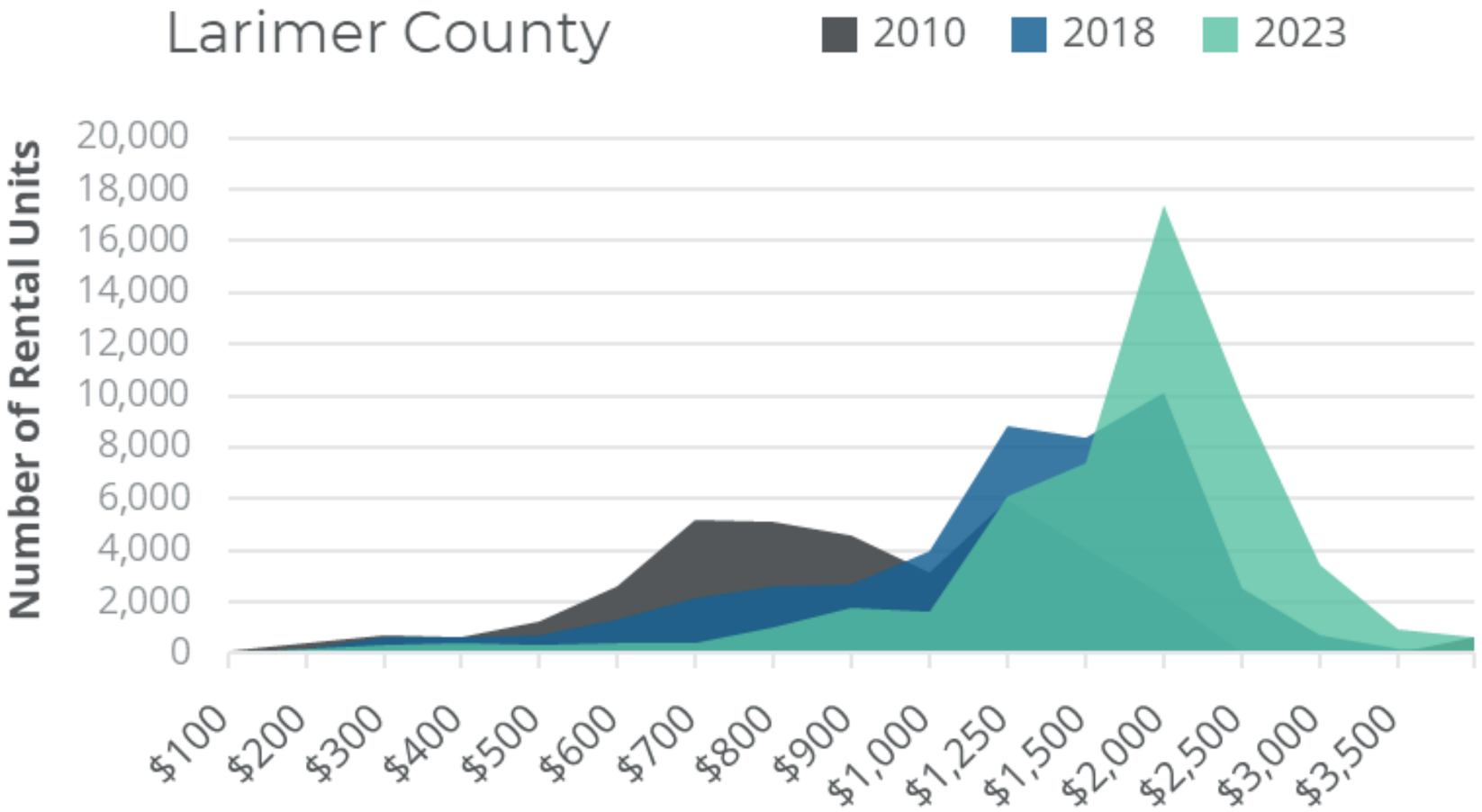
Between 2018 and 2023, median rent in Larimer County increased dramatically as existing rental units shifted into higher price points and new products were delivered near the top of the market. Rent growth plateaued over the past 2 years, though vacancy rates remain low.



Multifamily Rent and Vacancy Trends| Source: Costar and Root Policy Research

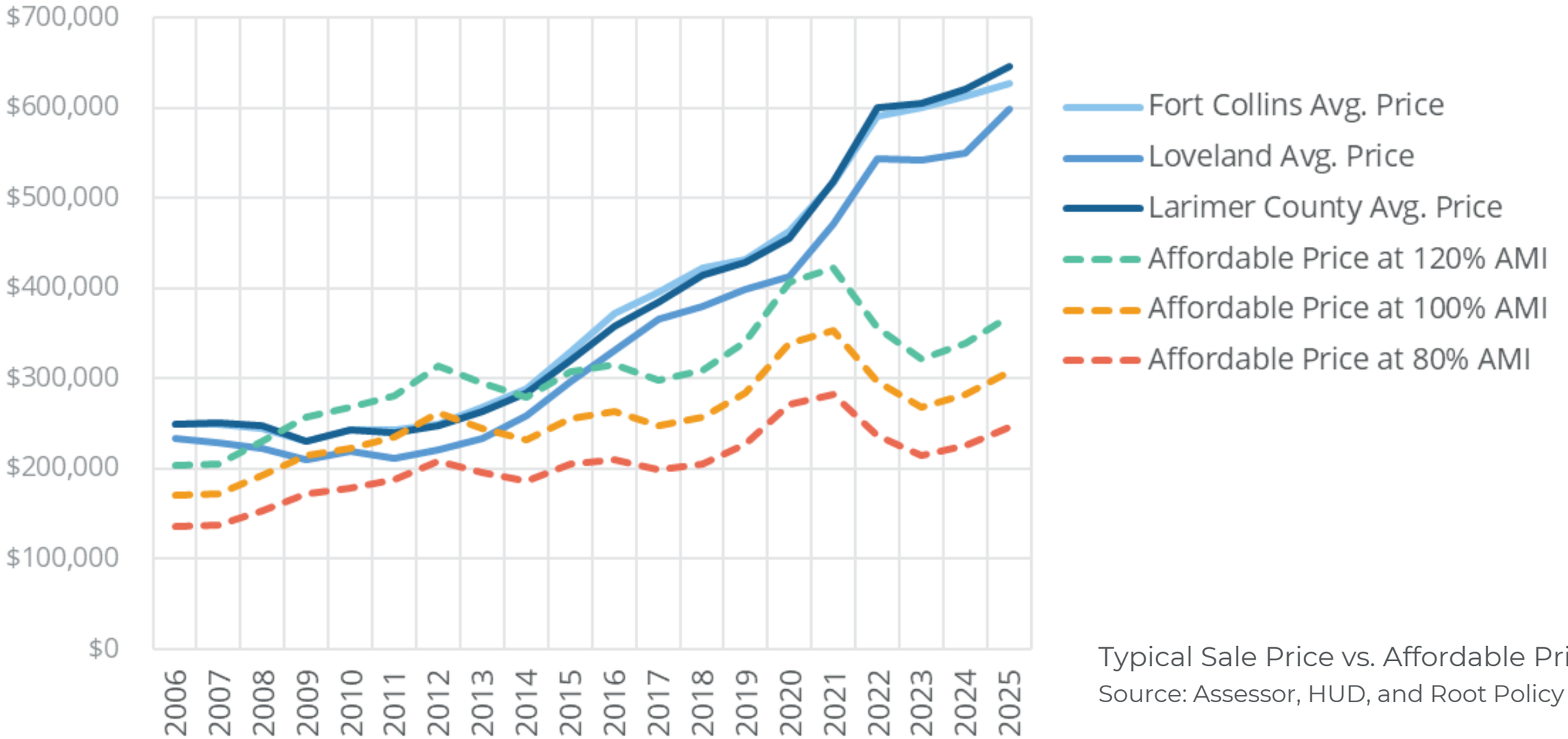
Rental Market

Rent increases are occurring across market segments, resulting in a significant loss of naturally affordable rental stock. The proportion of rentals priced below $1,500 was cut in half between 2018 and 2023 (from 70% down to 38%).



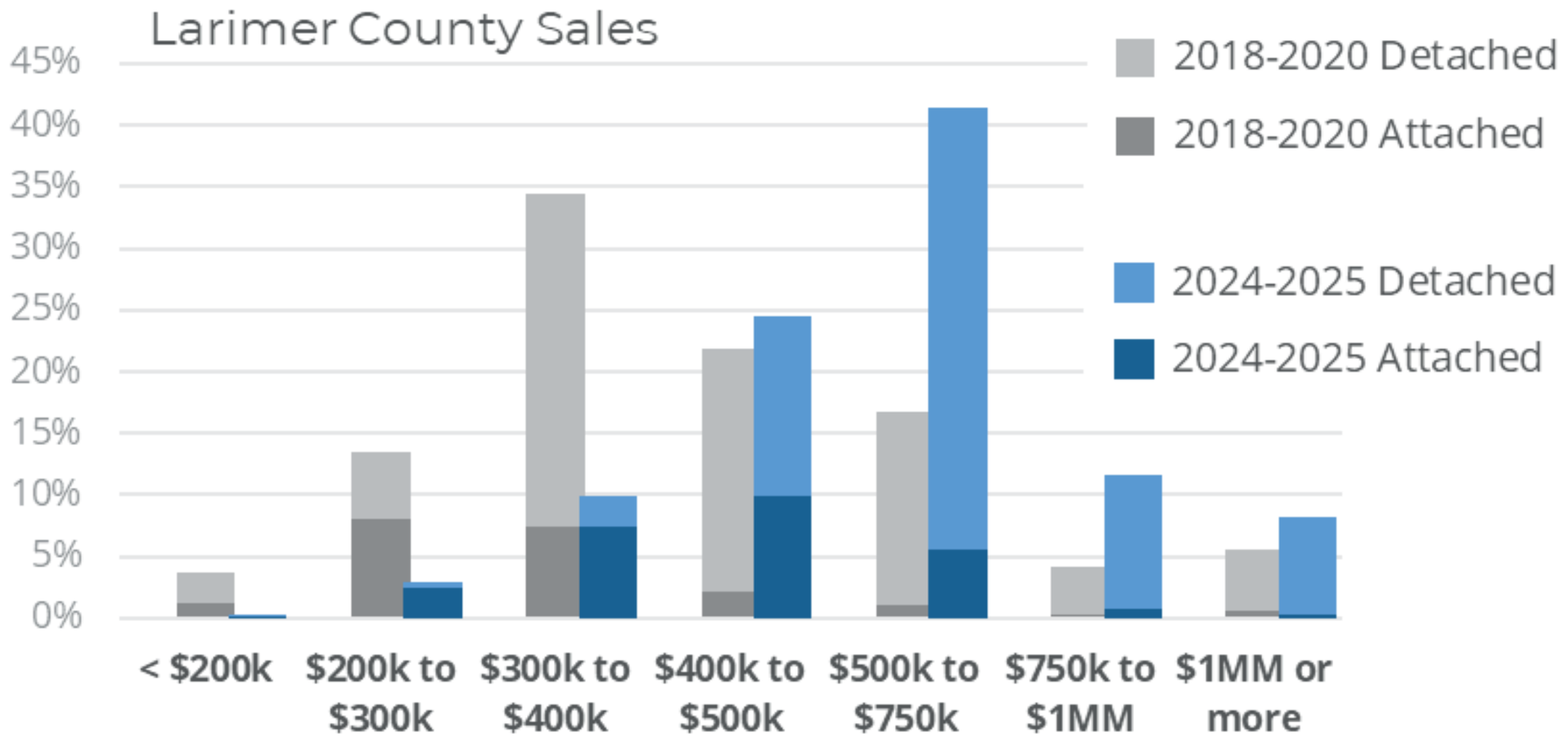
Rent Distribution, 2010, 2018 and 2023 | Source: ACS and Root Policy Research

Home Purchase Market:
Typical Sale Price vs Affordable Home Price by AMI



Typical Sale Price vs. Affordable Price
Source: Assessor, HUD, and Root Policy Research

Home Purchase Market:
Sales Distribution by Price and Type, 2018/20 and 2024/25



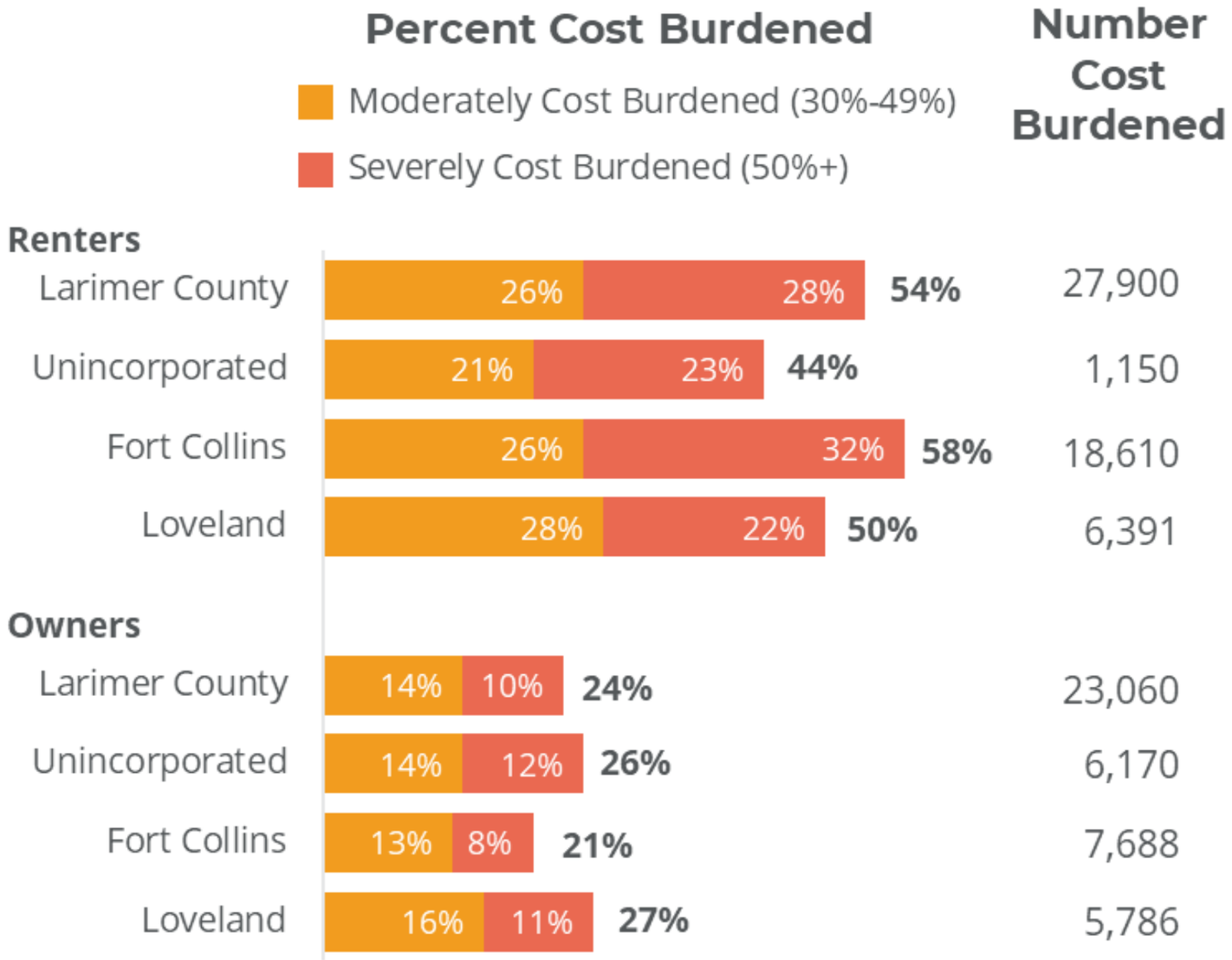
Home Sales by Price and Type | source: Assessor, HUD, and Root Policy Research

Housing Affordability and Needs

Changes in affordability, mismatches in supply and demand, and cost burden.

Housing Stability

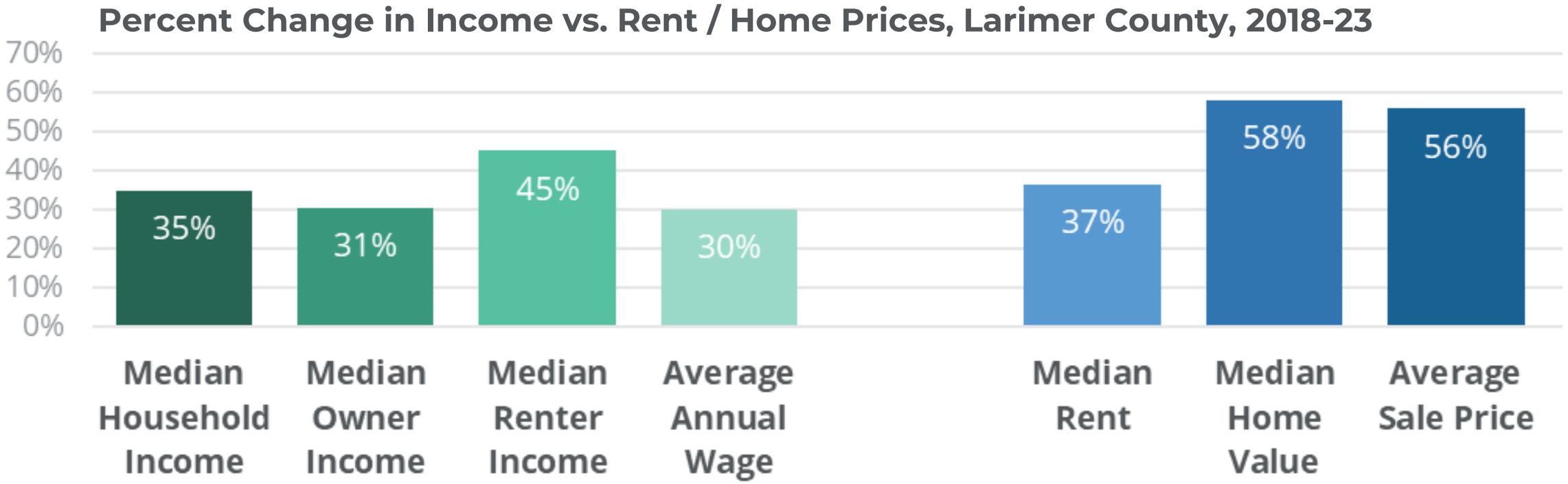
- 51,000 households are cost burdened.
- 24,000 of those are severely cost burdened.
- Nearly 7,000 people experienced homelessness in Larimer County in 2024.



Cost Burden, 2023 | source: ACS and Root Policy Research

Affordability Changes at the Median

At the median, the rise in home prices far exceeded income and wage gains over the past five years. Median renter incomes rose at a slightly higher rate than median rents; however there remains a substantial affordability gap for many renters (evidenced by cost burden and affordability gaps analysis).



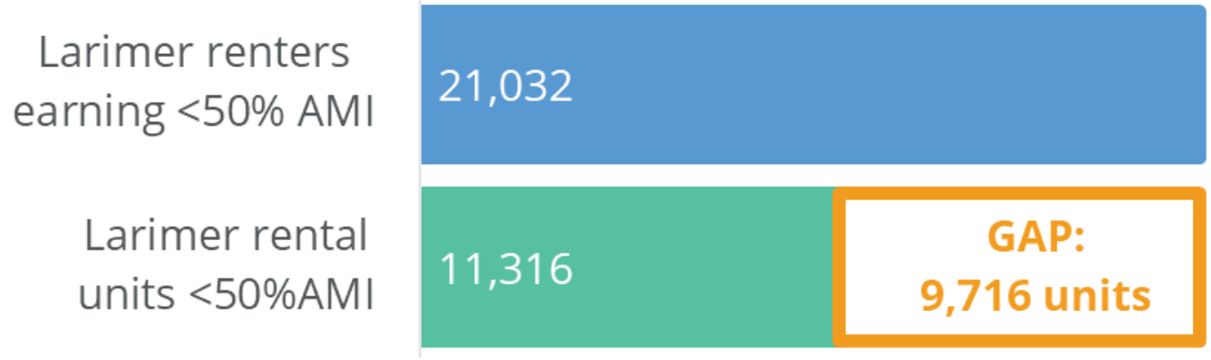
source: ACS, Assessor, and Root Policy Research

Current Affordability Gaps

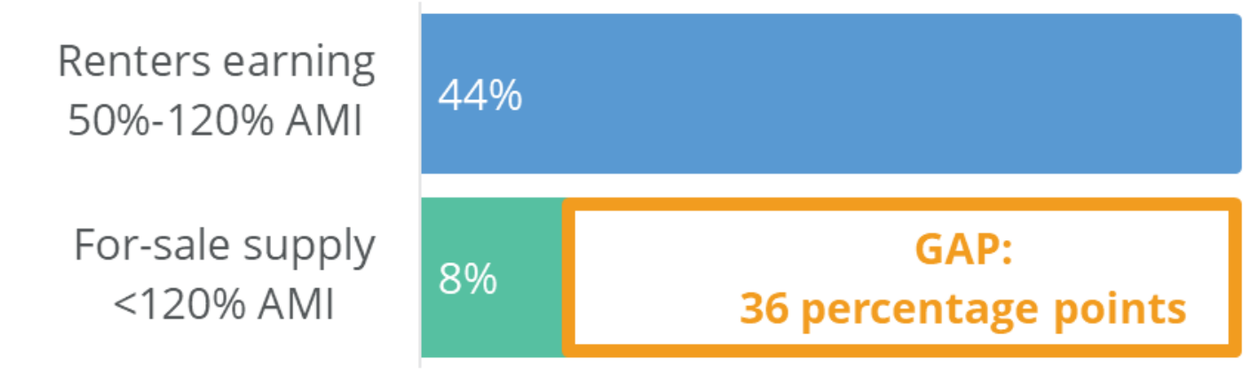
Mismatches in supply and demand by price-point show existing affordability needs are concentrated:

- below **50% AMI** in the rental market; and
- below **120% AMI** in the for-sale market.

Rental Affordability Gap



For-Sale Affordability Gap



Affordability gaps can be addressed through new units at needed price-points and/or subsidies of existing units.

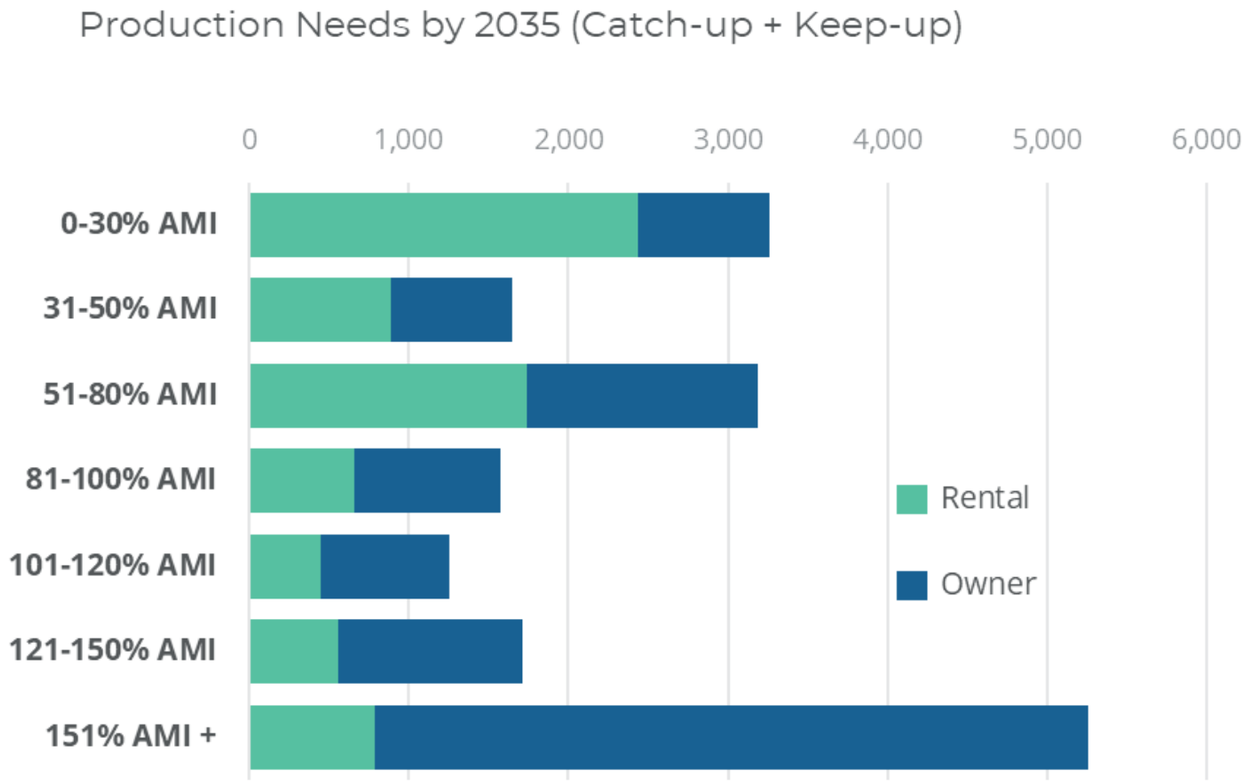
Production Needs

Catch-up needs: Larimer County needs 3,394 new housing units (1,285 units for sale and 2,109 rental units), to alleviate overcrowding and soften vacancy rates for current residents.

Keep-up needs: Larimer County needs to add 14,502 units (9,093 for sale and 5,409 for rent) in the next 10 years to keep up with projected population and job growth.

Countywide: 17,897 units over 10 yrs

Unincorp: 1,428 units over 10 yrs



Community Engagement

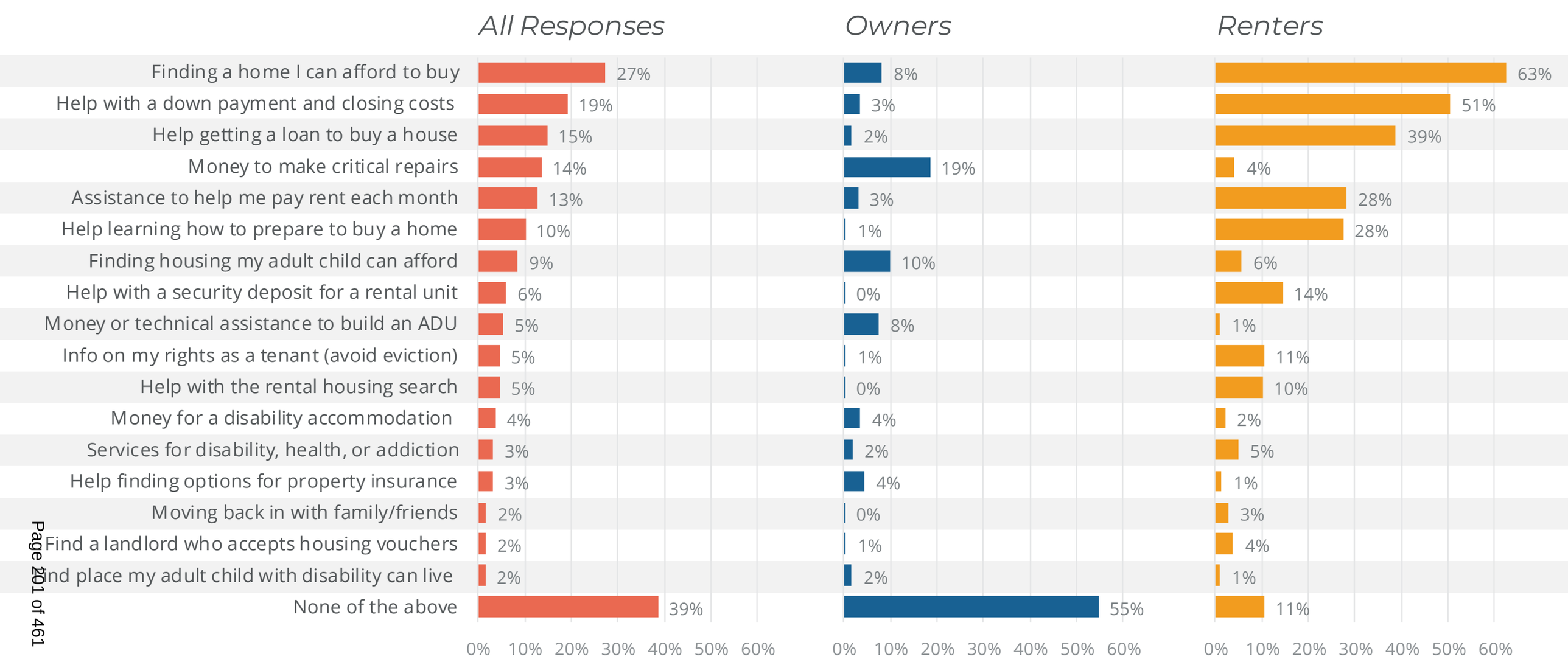
Resident and employer surveys, resident focus groups, community meetings, and stakeholder interviews and focus groups.

Engagement Opportunities

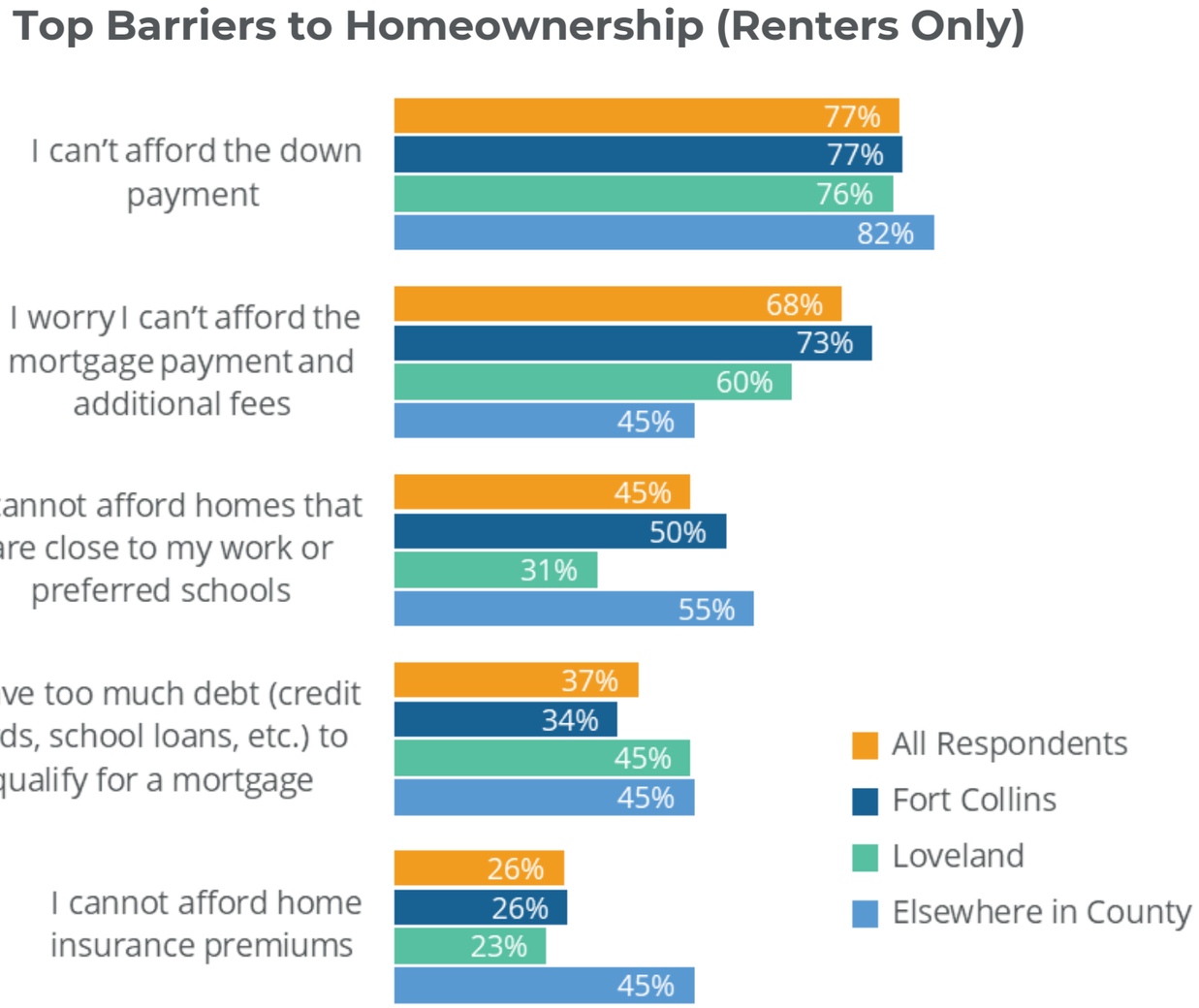
- **Community meetings** (Fort Collins, Loveland, Red Feather)
- **Stakeholder focus groups and interviews (**developers, economic development officials, and service providers)
- **Employer survey** (43 respondents)
- **Resident focus groups** (residents living in mountain/rural communities, members of the Agricultural Advisory Board, mobile home communities, people experiencing homelessness, older adults, and families receiving rental and utility assistance)
- **Resident Survey** (1,146 respondents)

Housing Stability:

What would make you feel more secure in your current housing situation?



Barriers to Homeownership for Renters who want to buy…



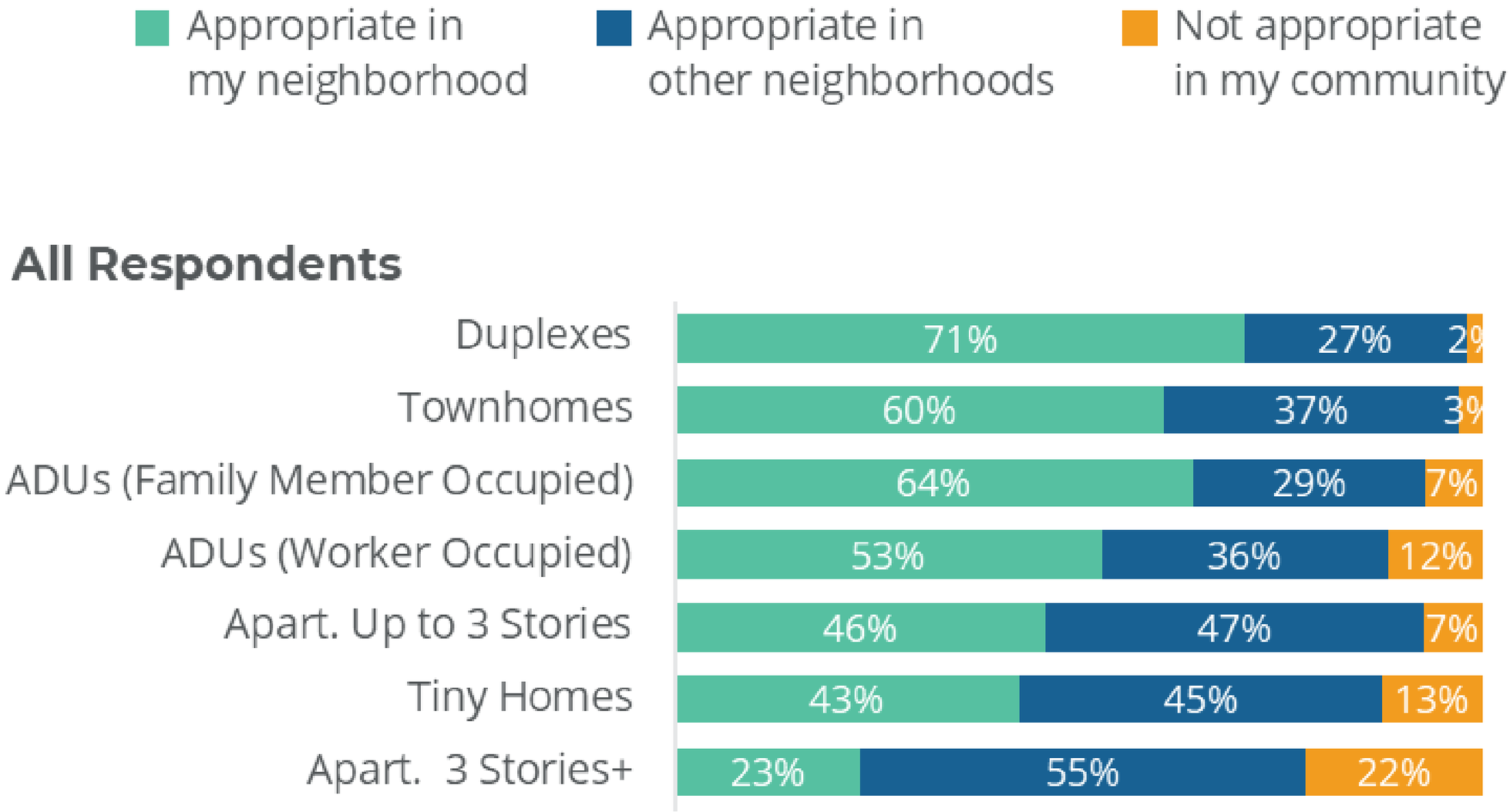
Renter Interest in Deed-Restricted Homeownership Programs:

- 38% Very interested
- 31% Somewhat interested
- 11% unsure
- 20% either not at all interested or somewhat uninterested

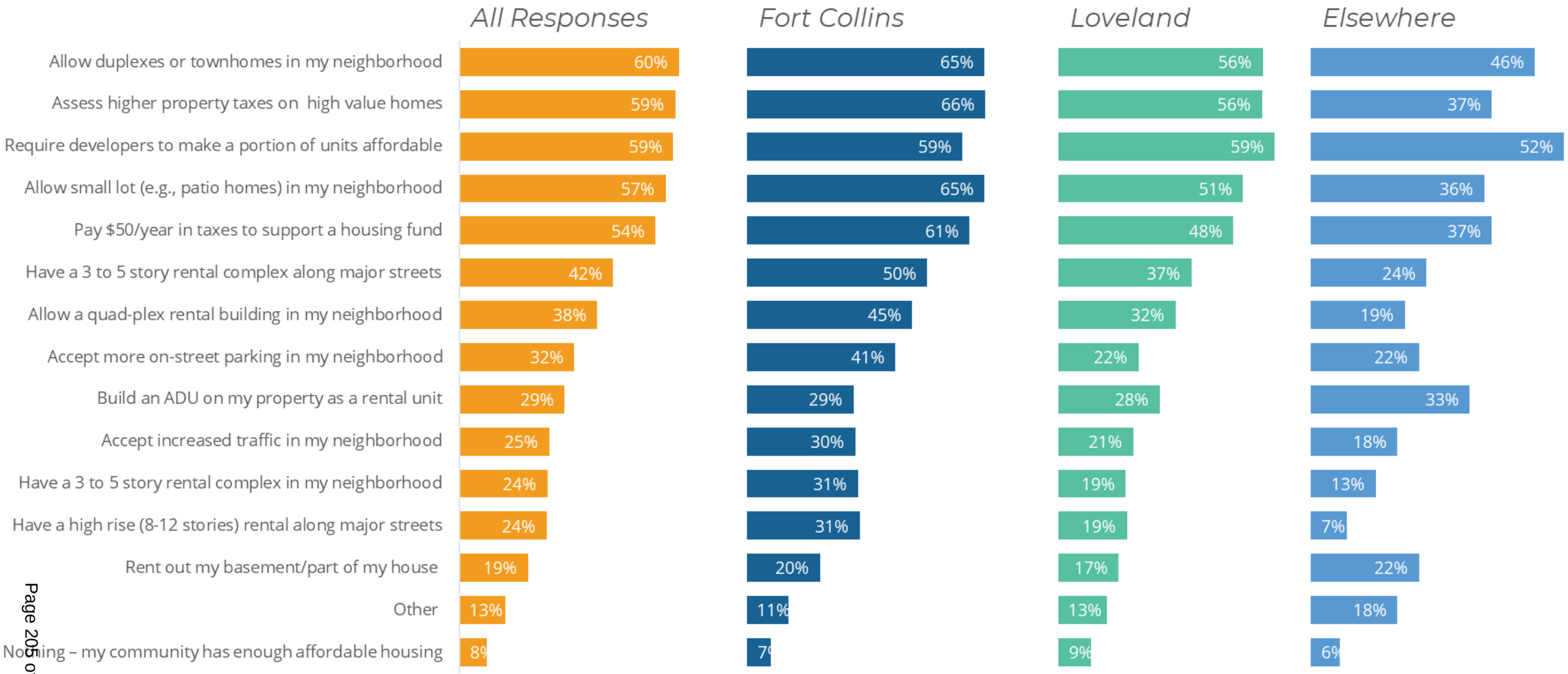
IMPORTANCE RATINGS OF VARIOUS HOUSING TYPES



Appetite for Various Housing Forms

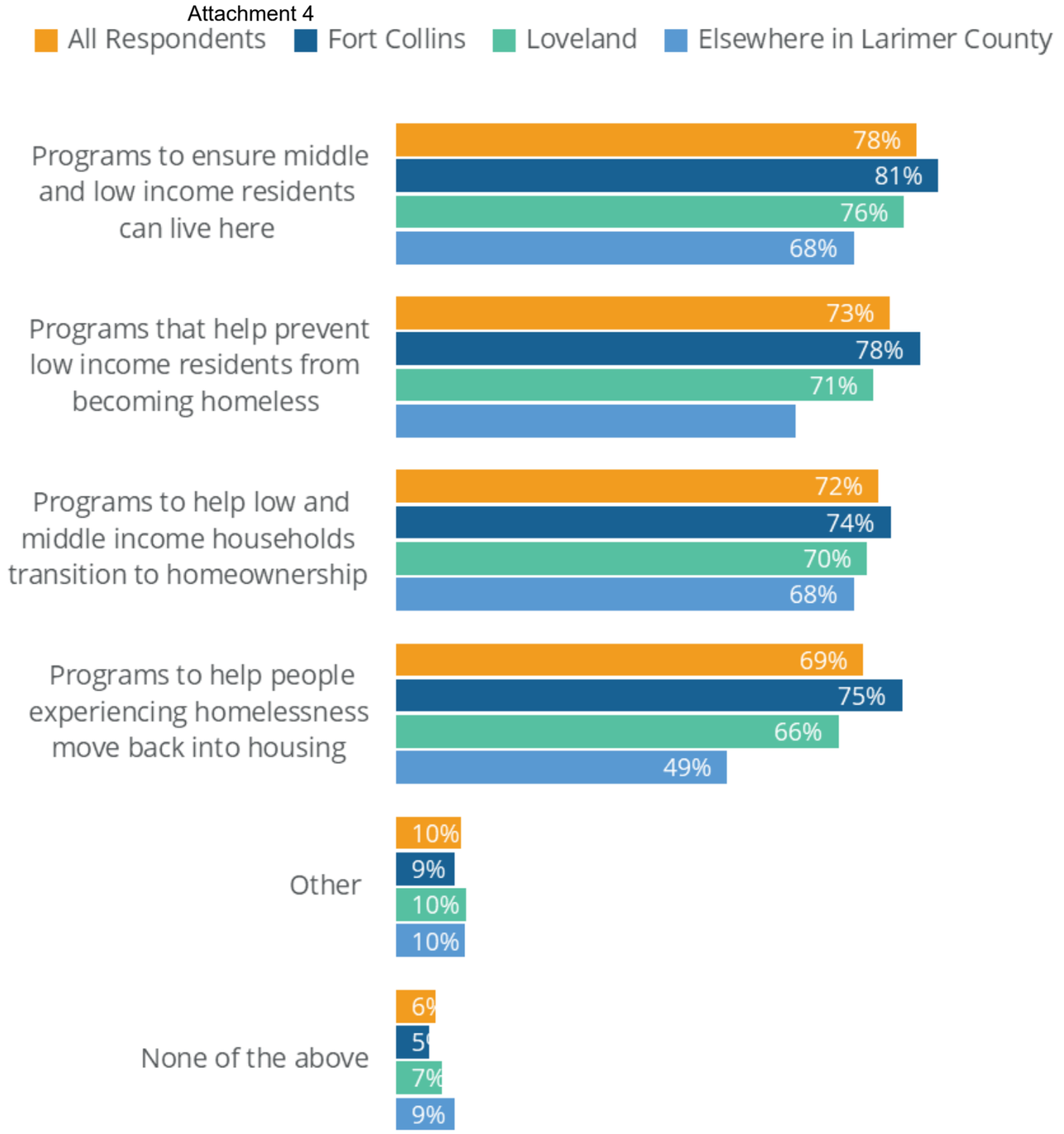


AFFORDABILITY TRADEOFFS



Program Priorities

Which types of housing programs should your City and/or County invest in over the next five years?



Stakeholder Perspectives

- **Housing affordability remains the most pressing challenge** across Larimer County, with both rental and homeownership opportunities out of reach for low- to moderate-income residents.
- **Certain populations face disproportionate housing barriers** (e.g., seniors on fixed incomes, families seeking larger affordable units, individuals needing temporary or emergency housing, service industry employees, seasonal workers)
- A **mismatch between existing housing supply and local needs persists** across the region. Stakeholders noted shortages of deeply affordable and smaller units, accessible senior housing, transitional or temporary housing options, and smaller for-sale homes for first time buyers.
- **Barriers to new development** include high construction costs, financing costs, limited developable land, community opposition, infrastructure constraints, and zoning barriers.
- **Gaps in services** affect residents with the greatest housing needs (limited emergency shelter beds, lack of temporary housing options with wrap-around services, transportation challenges, especially in rural and mountain areas, difficulty accessing programs).
- Stakeholders suggested **practical, targeted solutions,** including expanding rental and utility assistance, aligning programs with identified needs, improving service access in rural areas, and continuing to support local collaborative networks that have been effective in meeting residents' needs.

Recommendations, Reflections, & Next Steps

Recommended Actions

The recommendations in the HNA help set the stage for future Housing Action Plans for Loveland, Fort Collins, and Larimer County.

Recommendations are designed to achieve an integrated approach that leverages key partners and financial assets (both land and funds) to create housing that serves current and future residents, preserve existing affordability; and assist low-income households.

1. Continue regional collaboration and public-private partnerships.
2. Consider funding source options.
3. Allocate publicly owned land to affordable/mixed income development.
4. Preserve existing housing (serving low and moderate income households).
5. Implement land use and zoning modifications (to unlock supply and improve housing diversity).
6. Establish development incentives for affordable housing.
7. Assist and stabilize existing households through program support.



What's next? Housing Action Plan

- What data surprised you? Where do you still have questions—what additional information do you need to set goals/priorities?
- Any initial thoughts on preliminary recommendations?
- As we move into Housing Action Planning, how would you like to see the recommendations operationalized?
- Are there any policies or programs you've seen in peer counties that you want to make sure we explore?



Commissioner Discussion

Thank you!

ROOT POLICY RESEARCH

MEETING DATE:	March 24, 2026
TO:	City Council
DEPARTMENT:	Development Services
DIRECTOR:	Robert Paulsen
PRESENTER:	Kerri Burchett, Principal City Planner
STRATEGIC PLAN FOCUS AREA:	Economic Vitality Livability

AGENDA ITEM:
PRESENTATION REGARDING PROPOSITION 123 AFFORDABLE HOUSING AMENDMENTS

RECOMMENDED CITY COUNCIL ACTION:
This item is informational. There is no recommended City Council action from staff

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	N/A
Deny the motion or take no action	N/A
Adopt a Modified Action	N/A
Refer back to Staff	N/A

SUMMARY:

Purpose: The purpose of this item is to update City Council on efforts needed to comply with Proposition 123, which is the voter approved initiative that created the State Affordable Housing Fund. City Council opted-in to the program by adopting Resolution #134-2023 in October of 2023 and as part of the requirements, an expedited review process must be established for qualifying affordable housing development applications.

Objective: The objective of this item is to provide an overview of the work underway to support Proposition 123 compliance, including outreach efforts and the general direction of amendments to the Unified Development Code (UDC).

Impact: The impact of this item is to address actions needed to comply with Proposition 123 and facilitate affordable housing opportunities in the City. Amendments will streamline the review process, simplify and adjust housing standards based on market trends, and add incentives for housing diversity as identified in the Housing Needs Assessment.

Council Follow-up: None

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A
	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	The City received a Local Planning Capacity grant of $160,000 in August of 2025 from the Department of Local Affairs to support the necessary updates to the UDC for Proposition 123 compliance.

STRATEGIC PLAN FOCUS AREA

Focus	Economic Vitality Livability
Strategy (if applicable)	Continually Improve Our Processes Strive to Ensure Opportunity is Available to All
Priority (if applicable)	Development Review & Building Permit Processes Affordable and Attainable Housing
Notes	Economic Vitality and Livability

COUNCIL OR BOARD/COMMISSION REVIEW:

Type of Meeting: Informational meetings to share progress on the amendments have been held with:

1. Planning Commission
2. Affordable Housing Commission

Date of Meeting: March 9, 2026

Resulting Vote: The meetings were informational to share an overview of the project. As such, there were no votes taken.

Discussion: N/A

BACKGROUND:

History:
Colorado voters approved Proposition 123 in 2022, creating the State Affordable Housing Fund and dedicating a portion of State revenue to affordable housing programs. It dedicates $300 million annually to the State Affordable Housing Fund to support affordable housing development statewide.

Jurisdictions that opt-in must:

- Commit to increasing the affordable housing stock by 3% per year for 3 years, and
- Establish a 90-day maximum fast-track review process for qualifying affordable housing applications by December 31, 2026.

City Council opted into the program by adopting Resolution #134-2023 (**Attachment 1**) in October of 2023 and committed to increase Loveland's affordable housing stock by 82 new units per year or 246 units over the 3-year period. The current commitment period ends on December 31, 2026, and Loveland is on track to meet the commitment.

Proposition 123 sets statewide affordability thresholds that determine which units qualify for a jurisdiction's 3% annual commitment. It defines affordable housing as units that meet the following thresholds:

- Rental units: affordable to households earning 60% or less AMI
- For-sale units: affordable to households earning 100% or less AMI
- In all cases, housing costs must be less than 30% of the household's monthly income

To count towards the 3% annual affordable housing stock, units can be new construction, which is counted when a building permit is issued for a deed restricted unit, or it can be Naturally Occurring Affordable Housing (NOAH) which must be newly added and meet the affordability thresholds at the end of the 3-year period. NOAH units do not require a deed restriction. Small lot cottage units and attached units such as duplexes and townhomes often qualify as NOAH based on the market rate. Compliance tracking of affordable units is being managed by the Community Partnership Office.

To support implementation of an expedited review process for qualified affordable housing projects, as required by the State, the City received a Local Planning Capacity grant and contracted with Framework, a consulting team specializing in development code modernization and housing feasibility analysis. Framework evaluated efficiencies of recently processed housing applications, completed an audit of the UDC, and conducted surveys, interviews and focus group discussions with local developers, builders, land use designers, and City staff to gain an understanding of process challenges, unclear standards, and regulatory barriers affecting the development of affordable housing. A summary of the UDC audit is included as **Attachment 2**.

Under Proposition 123, only development applications meeting both State affordability thresholds and local procedural triggers are subject to the 90-day maximum review timeline.

To qualify for expedited review under State requirements, a project must:

- Include at least 50% affordable housing units within the project, as defined by State affordability criteria; and

- Require one or more qualifying City development applications. In Loveland, there are four application types that meet the State threshold: site development plans, variations, variances, and building permits. Given the 50% affordability requirement and the limited number of qualifying application types, the number of projects eligible for expedited review is expected to be relatively narrow. Staff is exploring whether to expand eligible application types and/or apply elements of the expedited review process to housing projects that include affordable units at a percentage below the State threshold. This approach could facilitate the timely review and delivery of additional affordable housing units, even when projects do not qualify for State-mandated expedited review.

Expanding eligible application types or broadening the applicability would not create additional State reporting requirements beyond those established under Proposition 123. Rather, it would demonstrate the City's commitment to proactively supporting affordable housing production and aligning our procedures with the housing goals identified in the Housing Needs Assessment. The Housing Needs Assessment, as required in SB 24-174, is being conducted by Root Policy Research to better understand current and future housings challenges affecting residents ability to find and maintain stable housing. The City partnered with Larimer County and Fort Collins to complete the assessment on a regional scale, ensuring a more comprehensive understanding of shared housing needs and market conditions.

Outreach and Notification Efforts: Several rounds of engagement with City staff, developers, builders, and private sector land use designers have been completed and used to shape the recommended code and process updates.

Efforts to date include:
• Staff and Developer Surveys: In August, surveys were distributed to City review staff and local development partners to identify barriers and challenges with the existing review process.
• Developer Interviews: In October, 30-minute interviews were conducted with local developers and land use consultants to gather detailed feedback on feasibility challenges and code barriers.
• Developer for a Day Workshop: In October, a hands-on workshop was held with the City's development review team that placed staff into the role of a small-scale real estate developer to illustrate how zoning and code requirements directly affect project feasibility.
• Focus Group Discussions: In February and March, meetings with City staff and local development partners were held to discuss ways to expedite the development review process. Draft code amendments were provided with polling software to gauge the importance of the amendments in encouraging affordable housing.
• Development Summit: In March, a joint meeting was held with City staff and the development community to further refine the fast-track development review process and discuss direction on the code amendments.
• Affordable Housing Task Force: In March, a project update was presented to the Affordable Housing Task Force.

To date, the key resulting themes from the outreach include:
• Strong desire for clearer standards & more predictable processes.
• Developers consistently reported that the current code is complex, difficult to navigate, and not well suited for small lot or infill housing.
• Both staff and applicants identified the need for improved completeness checks and more coordination between applicants and city staff to collaborate and problem solve.

• Utility standards, especially for small lots, were cited as a barrier to feasibility and timely review. Public Works is actively creating small lot utility and infrastructure standards to align with the UDC amendments.

Conditions met/or anticipated: N/A

Start and End Dates (of studies, design, construction, or in service/operational): To encourage early adoption, the State has added a one-time $45,000 incentive grant (with no local match) to support affordable housing in the City, if the amendments are adopted by June 20. The amendments are tentatively scheduled for City Council hearings on June 2nd and June 16th to qualify for the grant.

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Att 1 Resolution Opting in to Proposition 123
Att 2 Framework Code Audit & Update Strategy Summary
Att 3 Draft Flowchart for Expedited Review Process
Att 4 Presentation Slides

RESOLUTION #R-134-2023

A RESOLUTION APPROVING THE CITY OF LOVELAND TO OPT IN TO PROPOSITION 123 WHICH PROVIDES STATE FUNDING TO ASSIST LOCAL GOVERNMENTS IN INCREASING THE AMOUNT OF AFFORDABLE HOUSING AND AUTHORIZING THE CITY MANAGER TO EXECUTE AND FILE ASSOCIATED DOCUMENTATION REQUIRED BY THE STATE OF COLORADO TO PARTICPATE THEREIN

WHEREAS, the City of Loveland (the "City"), is a duly organized and existing home rule municipality of the State of Colorado (the "State"), created and operating pursuant to Article XX of the Constitution of the State of Colorado and the home rule charter of the City; and

WHEREAS, on November 8, 2022, Colorado voters passed Proposition 123 dedicating a portion of each year of state income tax revenue to fund a State Affordable Housing Fund estimated at $300 million for State fiscal year 2023-2024 and thereafter; and

WHEREAS, the State Affordable Housing Fund was divided into two voluntary programs administered by the Office of Economic Development and International Trade ("OEDIT") and the Department of Local Affairs ("DOLA"): (1) the Affordable Housing Financing Fund that, in part, provides grants to assist local governments' efforts to increase the amount of affordable housing by acquiring and preserving land for the development of affordable housing; and (2) the Affordable Housing Support Fund that, in part, provides grants to local governments to increase planning capacity and provides loans and grants to local governments to support the development and preservation of supportive housing for persons experiencing homelessness; and

WHEREAS, the language of Proposition 123 and C.R.S. §29-32-105 require each participating jurisdiction that desires to opt in to: (1) make and file with DOLA by November 1, 2023, a three-year commitment specifying how the jurisdiction intends to increase its affordable housing stock by three percent (3%) annually or nine percent (9%) by December 31, 2026; and (2) create a fast-track approval process for affordable housing projects; and

WHEREAS, to make the formal three-year commitment to the various affordable housing programs the City Council desires to opt in to Proposition 123 and authorize the City Manager to execute and file the necessary commitment and any associated documentation by November 1, 2023.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF LOVELAND, COLORADO:

Section 1. That the Loveland City Council finds and determines that opting in to Proposition 123 by making the required commitment and executing and filing the associated documentation by November 1, 2023, is in the best interests of the City.

Section 2. That the Loveland City Council hereby authorizes the City Manager, or his designee, to execute and approve the commitment and any associated documentation required to participate in Proposition 123.

Section 3. That this Resolution shall become effective upon its adoption.

ADOPTED this 24th day of October, 2023.

CITY OF LOVELAND, COLORADO

Jacki Marsh, Mayor

ATTEST:

Delynn Coldiron, City Clerk

APPROVED AS TO FORM:

Moses Garcia, City Attorney

A RESOLUTION APPROVING THE CITY OF LOVELAND TO OPT IN TO PROPOSITION 123 WHICH PROVIDES STATE FUNDING TO ASSIST LOCAL GOVERNMENTS IN INCREASING THE AMOUNT OF AFFORDABLE HOUSING AND AUTHORIZING THE CITY MANAGER TO EXECUTE AND FILE ASSOCIATED DOCUMENTATION REQUIRED BY THE STATE OF COLORADO TO PARTICPATE THEREIN

Loveland Code Amendments, Process Improvements, & Prop 123 Implementation

Code Audit & Update Strategy Summary

City of Loveland

framework

January 28, 2026

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Proposition 123 6
Engagement & Audit Findings 9
Update Strategy 13

Executive Summary

In October 2023, the City of Loveland opted into the State of Colorado's Proposition 123 Affordable Housing Initiative. Proposition 123, or Prop 123, is an initiative approved by voters in November 2022 which dedicates $300 million in annual tax revenue to support affordable housing across the state. Jurisdictions that opt into the initiative can access this funding pool so long as they implement a 90-day maximum expedited review process for certain affordable housing development applications. For Loveland, this expedited review process must be established by December 31, 2026.

To support the creation and implementation of this expedited review process, the City contracted with Framework to assess both the current review process and development regulations, using their findings to identify challenges to fast-tracking affordable housing projects. Framework's assessment included a review of recent development projects and applications, interviews with City staff and local developers, stakeholder surveys, and a detailed audit of Loveland's Unified Development Code (UDC).

Three general update strategies are proposed below to align the City of Loveland's development review process and regulations with Prop 123. Each strategy is framed by summarizing the issue at hand and proposes actions for improvement. **Short-term actions** include Prop 123 compliance measures to be implemented by June 2026. **Long-term actions** cover additional policy and regulatory amendments recommended to optimize affordable housing opportunities in Loveland in the next 5 years.

The project team will follow the update strategies to draft code amendments, test the feasibility of incentives, and discuss technicalities with key stakeholders between January and late February. A Development Summit to workshop draft amendments with review staff and developers will tentatively take place in early March and a project update will be provided during the City Council study session on March 24. The complete package of draft UDC amendments, process improvements, and supplemental materials is expected to go through the local legislative review process beginning in April.

Unified Development Code Streamlining

Opportunity: Loveland's current residential development standards come from a well-meaning place, but they do not always support the City's goals for housing affordability and faster project review required under Prop 123. An analysis of the development review process, paired with the code audit, feasibility testing, and interviews with local developers and staff, highlights a key challenge: the City's development and infrastructure codes were built around large, suburban-style projects and do not easily accommodate smaller lots or infill development. As a

result, tools like the Housing Palette, dimensional and use standards, and the Complete Neighborhood Standards can be difficult to apply in real-world situations.

Path Forward: By clarifying and simplifying the residential standards, Loveland has the chance to make the UDC more user-friendly and effective. Streamlined standards will improve administration, make the code easier to navigate, and help more projects move forward by right. Additionally, in parallel with Prop 123 adjustments, the City's Public Works Department is in the progress of developing small lot infrastructure templates that will streamline infrastructure design, creating transparency and predictability. This will in turn support faster permitting timelines. More flexible development options and incentives that encourage housing diversity will open the door for small-lot and "missing middle" infill housing, expanding the range of homes available and supporting the community's broader affordability goals.

Short-Term Actions

1. Consolidate housing types within the Housing Palette to promote flexibility and more predictable reviews
2. Update use permissions and dimensional standards to reflect development trends and feasibility
3. Recalibrate lot coverage thresholds to better support compact houses on small lots
4. Adjust off-street parking requirements to accommodate multi-unit housing, smaller lots, and on-street parking alternatives
5. Develop small lot infrastructure standards (in progress with Public Works)

Long-Term Actions

1. Modernize the Housing Cluster and Complete Neighborhood Standards to increase usability and development potential
2. Create process flowcharts and application examples to provide clearer expectations for applicants
3. Apply targeted comprehensive plan updates to promote housing diversity and enable density increases in select zoning districts

Process Improvements

Opportunity: Current affordable housing standards in the UDC specify that City Council designated affordable housing projects are to be expedited to the extent feasible, but does not provide a mechanism or clear process to achieve the compressed timeline under Prop 123. A review of several affordable housing projects that would have required fast-tracked review showed that they exceeded Prop 123 timelines by months, if not more. Delays can be traced back to both inefficiencies in City processes and considerable resubmittal delays from applicant teams when re-submitting the projects.

Path Forward: At minimum, Loveland must establish a dedicated review process for Prop 123 eligible projects that lasts no more than 90 calendar days. Ideally guided by a dedicated development coordinator, this fast-track will include a robust pre-application meeting, thorough completeness check, and improved cross-departmental coordination. Prop 123 applications will need to be processed ahead of other applications with a recommended maximum of two rounds of review once applications are deemed complete. A clear resolution pathway will be developed to efficiently review design alternatives and resolve conflicts, and applicant timelines will be established for resubmittals.

Short-Term Actions

1. Establish a robust and predictable pre-application process
2. Develop a 90-day fast track review flowchart with applicant and reviewer timelines for Prop 123 compliance
3. Provide an option to decouple site planning and platting review processes for subdivisions
4. Create an internal resolution process for problem solving, design alternatives, or interdepartmental conflicts
5. Review and update neighborhood outreach and appeal processes for affordable housing projects to reduce delays while ensuring transparency

Long-Term Actions

1. Implement a development tracking mechanism in Accela for staff and applicant visibility on timelines and milestones (in progress)
2. Establish policies for development review staff including a requirement to cite specific standards in comments and redlines

Prop 123 and Local Affordable Housing Incentives

Opportunity: Fee waivers, density bonuses, and other incentives outlined in Title 17 were for a long time only available to deeply affordable deed-restricted units built by non-profit developers like the Loveland Housing Authority and Habitat for Humanity. More recently, a pilot program with Aspen Homes has also successfully utilized fee waivers and density incentives for the Wilson Commons development. No incentives in the form of financial (fee) relief or via development bonuses exist for the affordability levels defined in Prop 123 (up to 100% of the Area Median Income).

Path Forward: Loveland's incentives for deeply affordable deed-restricted homes built by non-profit housing developers will be retained in Title 17. However, a new suite of design incentives and development bonuses should be established in Title 18 for projects categorized as "Naturally Occurring Affordable Housing." Modest increases in density and building coverage, architectural design relief, or parking reductions are possible incentives to encourage

development of a variety of housing products that can serve middle-income households and smaller homes affordable to 100% AMI (for sale) and 60% AMI (rental).

Short-Term Actions

1. Create a new UDC section consolidating affordable housing incentives for all zones, including planned unit developments and conventional zoning
2. Establish incentives to promote product diversity and mixed-use developments, encouraging Naturally Occurring Affordable Housing (NOAH)

Long-Term Actions

1. Develop policies and regulations that enable homeownership opportunities in accessory dwelling units
2. Pursue grants and other state funding programs to expand affordable housing tools

Introduction

This document provides a project overview and outlines a proposed development review process and regulatory framework for the City of Loveland to satisfy Prop 123 requirements. An overview of Prop 123 communicates the key mandatory provisions for Loveland and audit findings summarize the existing challenges identified for the City's existing permit review process, unified development code, and affordable housing code. Engagement efforts with Loveland's development review staff and local developers and designers are also highlighted throughout this document. Key update strategies are ultimately proposed for streamlining of the unified development code, process improvements, and affordable housing incentives with recommendations for short- and long-term actions.

Proposition 123

Overview

Enacted by Colorado voters in 2022, Proposition 123 (C.R.S. 29-32-105(2)) establishes the State Affordable Housing Fund, a sustainable funding source designed to help Colorado communities address housing affordability challenges across the state. The fund allows governmental, tribal, non-profit, and for-profit housing developers to access grant and low-interest loan programs to construct affordable housing in specific jurisdictions that opt-in to the requirements set forth in the proposition.

Proposition 123 includes distinct requirements for commitment filing and counting of units, fast-track review, and funding opportunities for affordability households, and sets forth the following Affordability Thresholds:

- Rental housing at or below 60% area median income (AMI), or
- For-sale housing that is at or below 100% AMI, and
- Which costs the household less than 30% of its monthly income.

Commitment Filing & Unit Counting Criteria

Unlocking access to the State Affordable Housing Fund established under Prop 123 requires communities to "opt in" to the program by filing a Local Government Affordable Housing Commitment. This process commits those jurisdictions to increase their local affordable housing stock by 3% each year for three consecutive years. Figure 1 includes Loveland's baseline and first three-year commitment cycle under Prop 123.

Figure 1. Proposition 123 baseline and annual commitment for Loveland.

Baseline Affordable Units* (accepted 10/24/23)	Annual Commitment to Build (3%)	Aggregate 3-Year Commitment (9%)
2,736 units	82 units	246 units

Colorado Department of Local Affairs, 2025

The end date for fulfilling the City's three-year commitment is December 31, 2026. Shortly before this, Loveland faces a filing deadline of November 1, 2026 to initiate its second three-year commitment cycle (2027-2029). Failure to meet the first three-year commitment will result in projects losing Prop 123 funding eligibility during the first year of the next three-year cycle (losing eligibility in 2027).

The following criteria must be met for a community to count units toward its Prop 123 commitment:

- **New Construction:** Counted when a building permit is issued for vertical construction and an affordability mechanism is in place (e.g. deed restriction, resale agreement, etc.). Rental and ownership housing must be affordable to household income levels established by the law (60% AMI for rental, 100% AMI for ownership).
- **Preservation and Conversions:** Counted either once the project is fully funded or when a permit for the required work is issued, whatever is later. If neither funding nor permitting is applicable, the units are counted when an affordability mechanism is executed. Rental and ownership housing must be affordable to household income levels established by the law,
- **Naturally Occurring Affordable Housing (NOAH):** Units must be newly added after the date of a jurisdiction's commitment filing and affordable to the income thresholds established by the law without affordability mechanisms. Affordability Thresholds must be met at the time of identification, with confirmation at the end of the commitment cycle that they remain within Affordability Thresholds.

As of early October 2025, approximately 205 units have been constructed at or below the affordability levels required by Prop 123 (see below), putting the City on track to meet its three-year commitment by the end of 2026. This tally includes 145 NOAH units that will be checked again for affordability at the end of the commitment cycle.

Fast-Track Requirement

Cities opting-in to Prop 123 also must establish a fast-tracked permitting process by December 31, 2026 for certain affordable housing projects, as defined below:

- A final decision on a complete application must be made within 90 days. This only applies to certain application types: site plans, development plans, building permits, variances,

conditional or special use permits, land use approvals, administrative modifications, and construction or engineering documents if they are required to be included in the application types above.

- At least 50% of the units must be affordable based on a percentage of AMI
    - Ownership units must be affordable to households earning up to 100% AMI
    - Rental units must be affordable to households earning up to 60% AMI
    - "Affordable" entails the household spending less than 30% of its monthly income on housing costs

Funding Opportunities

The State Affordable Housing Financing Fund, created by Prop 123 and managed by the Office of Economic Development and International Trade (OEDIT), supports land banking, equity, and debt investment to advance affordable housing across the state. Another Proposition 123 funding opportunity is administered by DOLA's Division of Housing and used to build new homes, acquire and rehabilitate existing properties, or prepare sites for future development. Figure 2 summarizes the project eligibility, affordability requirements, and other relevant information for each funding opportunity.

Figure 2. Summary of Proposition 123 Funding Opportunities

Program	Recipient Eligibility	Project Eligibility	Affordability Requirements / Other Considerations
Land Banking (OEDIT)	- Local & tribal governments (grants) - Nonprofits with a demonstrated history of affordable housing (forgivable loans)	- Acquisition of land for affordable rental or for-sale housing. Mixed-use allowed if predominant use is affordable housing - New-money acquisitions prioritized over refinance or gap financing	- Rental: ≤ 60% AMI - Ownership: ≤ 100% AMI - Mixed-use development, including non-restricted housing, is eligible provided that the predominant use (70%) is affordable. - Regulatory Agreement at time of program funding - Final development: covenant, ground lease, or similar for 30 yrs
Equity (OEDIT)	- Profit, nonprofit, & government / housing authority entities, tribal governments	- New multifamily rental developments (low- and middle-income) - Preservation of existing affordable rental properties	- Average AMI of restricted units: ≤ 90% AMI - Affordability covenant for 30 years, via Regulatory Agreement; right of first refusal for local govt

Program	Recipient Eligibility	Project Eligibility	Affordability Requirements / Other Considerations
Concessionary Debt* (OEDIT)	- Profit & nonprofit developers - Local governments, housing authorities, tribal governments	1. Multifamily Finance — new or preservation of low- & middle-income multifamily developments 2. LIHTC Gap Finance 3. LIHTC Predevelopment Finance	- Average AMI of restricted units: ≤ 60% AMI; up to 25% may be unrestricted (but not eligible for financing) - Regulatory Agreement required for greater of loan term or 30 years
New Construction/ Acquisition Rehabilitation (DOLA)	- Community Partner (Nonprofit organization) - Local Governments	- New Construction of homeownership units - Acquisition/Rehabilitation of homeownership units - Acquisition of land for homeownership units	- Ownership: ≤ 100% AMI - 30 year minimum **Bonus Subsidies:** - ≤ 10% for projects addressing transit-oriented development, density, energy efficiency, mixed-use, early childhood education, or inclusion of income restricted ADUs as wealth-building device - ≤ 10% for projects utilizing modular construction

OEDIT; CHFA; DOLA, 2025

*Concessionary Debt also covers financing for modular/factory-build manufacturers.

Engagement & Audit Findings

Over the past three months, the project team has evaluated Loveland's existing development review processes and regulations for clarity, objectivity, and efficiency with an emphasis on the statutory requirements of Prop 123. This evaluation included direct review of eight major permit applications processed and finaled by the City. The "Permitting Process Audit" is intended to get a clearer sense of how the current permitting process was unfolding for actual projects from both a developer and administrator perspective. The project team also conducted an in-depth "Regulatory Audit" to evaluate Loveland's Unified Development Code for clarity, usability, and consistency. Key findings from these two audits are summarized below.

Several engagement efforts supplement the analyses of the City's permitting process and regulations. In August, separate surveys were sent to City staff and local development partners asking about challenges and opportunities with the existing process and code. In total, 15 responses were recorded from review staff and 18 from developers and designers. Local developers and designers also shared their experience building homes in Loveland one-on-one

during eight 30-minute interviews in October and a "Developer for a Day" workshop with development review staff communicated development feasibility challenges and sought out process and regulatory improvements for affordable housing. Survey, interview, and workshop themes are embedded in the summaries below.

Permitting Process Audit

The City's current development review procedures and eight project applications were analyzed to better understand the baseline performance and recurring issues. The highlights summarized below were later corroborated by survey responses and interviews with Development Review Team staff and local developers.

1. Applicants favor the Planned Unit Developments (PUDs) review process, which is not subject to Prop 123's 90-day review period, and typically takes significantly longer for approval.

Most housing projects elect to follow the Planned Unit Development (PUD) path, which provides the developer with more flexibility to adjust City standards and housing products allowed than under the existing UDC. This results, in effect, in a developer creating new and unique zoning specific to that development, one that allows the flexibility they desire but takes much longer to review. This outcome is inconsistent with the goal of streamlining the review process and contributes to the City's challenges in achieving the 90-day target for projects, especially those that include affordable housing.

2. The Complete Neighborhood Standards were adopted in 2018 with the new Development Code and are intended to improve neighborhood quality and mix of housing types, but they are not being used.

Despite their creation in a new development code adopted in 2018, the Complete Neighborhood Standards have not been utilized in any development reviews. The majority of new development in Loveland is occurring near the city's edge, requiring annexation and new zoning. Rather than pursuing conventional zoning and applying for the Complete Neighborhood Standards, applicants are opting for the more streamlined PUD process. Furthermore, the Complete Neighborhood Standards are not designed to work for smaller-scale infill projects.

3. Multiple overlapping permits required for subdivisions impact the timeline for review and approvals.

The current code includes several overlapping and, in some cases, concurrently or sequentially applied review processes. Specifically, the Subdivision or Plat Review is integrated with the Site Development Permit process. Because the Site Development Permit is subject to a 90-day review clock, while the Subdivision Plat Review is not, this integration creates unnecessary asymmetry within the review process. This in turn imposes a strict deadline on application

materials that would not typically be subject to time limitations, which can lead to rushed application processing and potential delays. Additionally, other optional reviews like the Sketch Plat Review and the Sketch Site Development Permit further complicate the process.

4. Multiple reviewers across departments impacts review times and decision-making, often leading to multiple submissions prior to approval.

The development code designates the Planning Director and the City Engineer as the two individuals with the authority to review and make decisions on development projects. However, no additional clarity is given on the roles or authorities of other departments that participate in application review. Without defined responsibilities or conflict resolution procedures, the current distributed review process can lead to slow decision-making and multiple rounds of submittals, with some projects requiring up to five or more revision rounds before approval.

5. Emphasis on aligning prescriptive housing types and lot sizes during platting increases complexity and length of review times while reducing future flexibility.

The Loveland Development Code includes options for varied lot sizes that pair with housing types. The intention to align platting and site planning considerations is laudable but it adds complexity and reduces flexibility over time.

6. Development Review Team (DRT) members and local developers share a desire for clearer standards and stronger inter-departmental coordination.

Based on the initial survey, review staff and applicants indicated a shared desire for clearer development standards and a more coordinated and predictable review process. Survey responses and interviews consistently noted delays and uncertainty, often stemming from Public Works' current utilities standards. These issues are compounded for applicants proposing projects on smaller lots or developing alternative housing products. The absence of utility standards for small lots has resulted in uncertainty and time delays. In response, Public Works has begun development of small-lot utility standard updates to support an "affordable by design" solution with clear guidance and improved predictability within the application review process.

7. The City's completeness check, which starts the 90-day clock under Proposition 123, is constrained by limited staff resources and can cause review delays from the beginning.

The decision-making authority and degree of detail required in 18.14.03.06 Completeness Review is not fully implemented in reality. Limited staff capacity and a less-structured process mean that completeness checks do not consistently receive the amount of attention they may require, resulting in applications that might pass review initially but see delays down the line.

Regulatory Audit

An analysis of Loveland's Unified Development Code (Title 18) and Affordable Housing Code (Title 17) aimed to identify inconsistencies, procedural bottlenecks, and feasibility-limiting standards that impact predictability, usability, and overall residential project viability.

Overall, complexity and fragmentation within Title 18 make it difficult to navigate and follow, constraining housing production and development feasibility. The code favors greenfield, single-family development patterns and relies heavily on discretionary tools such as Planned Unit Developments (PUDs) to deliver diverse housing types. Infill development remains limited by minimum lot sizes, rigid unit-type definitions, and restrictive parking and utility standards.

1. Use standards should be simplified and provide greater clarity.

Loveland's use standards are fragmented, with excessive distinctions between housing types, overlapping permission categories, and standards scattered across multiple sections. This complexity makes by-right feasibility difficult to determine, creating uncertainty for both applicants and staff, and limiting development options.

2. Residential typologies and lot standards limit possibilities for diverse housing types resulting in extensive use of Planned Unit Developments (PUDs) for housing diversity.

Housing type and lot standards are overly prescriptive and tied too strictly to lot size, forcing design decisions too early and constraining adaptability. Minimum lot sizes, unit-type distinctions, and subjective standards reduce flexibility and limit infill potential. As a result, housing diversity depends overwhelmingly on the Planned Unit Development (PUD) process, reflected in the large share of residential land currently zoned as PUD and the generally limited and/or conditional allowances within the base zones. This reliance places housing variety within a negotiated framework, reducing predictability and increasing administrative burden compared to by-right zoning.

3. Development standards favor greenfield over infill.

While vacant parcels exist, most housing development occurs in greenfield areas, reinforcing low-density, car-dependent, single-family patterns. Development standards, allowed densities, and utility requirements are scaled for large, undeveloped parcels rather than small-lot or urban infill. Minimum lot sizes and rigid standards, including easement widths, meter limits, and installation sequencing, create physical and procedural barriers and prevent small-lot or missing middle infill from playing a meaningful role in housing supply.

4. Review processes lack efficiency and flexibility to meet desired permit timelines.

Loveland's review processes are slowed by vague or subjective criteria and excessive administrative oversight. Limited flexibility for residential and affordable housing, underutilized

expedited procedures, and overlapping review layers, create inefficiency and uncertainty while limiting the use of affordability incentives.

5. More flexibility is needed for zoning standards to accommodate different housing types.

While Comprehensive Plan amendments are beyond the scope of this project, the Audit and Survey findings indicate that limited flexibility in zoning standards contributes to administration complexity and developer reliance on PUDs. In many cases, modest increases in allowed intensity would reduce administrative overhead by codifying what were previously treated as unique, negotiated approvals and complex workarounds.

6. Design standards limit small-lot and higher-density housing.

Design requirements appear across multiple code sections and sometimes conflict, complicating review, increasing costs, and limiting the ability to deliver consistent design quality and viable affordable housing. Two-stall minimum parking for townhomes and rigid ratios for multifamily projects consume a disproportionate share of site area, reducing buildable space, driving up housing costs, and discouraging compact, affordable, walkable development.

7. Challenges with Utility and Service Standards for Middle Housing.

Oversized, inflexible easement, spacing, and access requirements complicate small-lot and multi-unit projects. A brief analysis of peer cities, combined with consultant experience working with other jurisdictions, indicates that more flexibility or alternative design solutions could be provided in the Loveland utility standards.

Update Strategy

The audit findings above, taken together with feedback from Loveland's development review team and local developers, point to three key areas within a successful update strategy: streamlining Loveland's Unified Development Code, improving review processes to fast-track affordable housing projects, and establishing affordable housing flexibility incentives and development bonuses.

Each topic is expanded upon below with example amendments corresponding to proposed actions. **Short-term actions** include Prop 123 compliance measures to be implemented by June 2026. **Long-term actions** cover additional policy and regulatory amendments recommended to optimize affordable housing opportunities in Loveland in the next 5 years.

Unified Development Code Streamlining

Loveland adopted a new unified development code (UDC) in 2018 with the goal of integrating zoning, subdivision, and annexation regulations into a unified code under Title 18. The effort successfully combined these regulatory layers, making it easier to identify all rules for land development within a single title. A heightened focus was also placed on guiding residential development by prescribing detailed standards for different housing types within a multi-layered framework that determines what can be built.

In combination with feasibility testing and interviews with local developers and staff, an analysis of the UDC highlights a key challenge: the City's development regulations were built around large, suburban-style projects and do not easily accommodate smaller lots or infill development. Similarly, new code tools like the Housing Palette, dimensional and use standards, and the Complete Neighborhood Standards, while laudable, can be difficult to apply in real-world situations.

Short-Term Actions regarding UDC streamlining are focused on updating key code sections to further the City's goals for affordable housing and faster project review required by Prop 123. Targeted amendments to essential code chapters will improve usability for reviewers and applicants, simplify the decision-making pathway for more diverse and affordable residential development, and help more projects move forward by right. Five actions are proposed to be implemented by June 2026.

1. **Consolidate housing types within the Housing Palette to promote flexibility and more predictable reviews.** The Housing Palette was added to the UDC in 2018 to promote housing diversity in Loveland's neighborhoods. The system prescribes specific lot and building standards to control the development of various single-family, duplex, townhouse, multiplex, manufactured, and clustered housing types. Commendable site planning analysis contributed to this effort of precisely matching buildings and lots, but the system has become unwieldy to administer and provides little flexibility in two key ways.

   First, the Housing Palette is not attainable for infill development. Because underutilized or vacant lots in Loveland's older neighborhoods have fixed geometries, they may not support diverse housing types outlined in the Housing Palette regardless of lot size or allowable density.

   Second, the narrowly defined lot types in the Housing Palette can restrict greenfield development where developers are platting new lots. In this case, developers are required to create lots according to their intended housing types at the time of permitting. This means any change to the development plans that may be necessary over time to accommodate market demand or financing (i.e. different types of homes, changes to

streets and infrastructure, or even minor changes to the proposed neighborhood layout) may trigger an arduous process of re-platting before permits are issued.

Proposed amendments for this short-term action entail the consolidation of similar housing types within the housing palette and creating a more flexible system of lot sizes and standards. The following table shows what this consolidation could look like, at a high level.

Existing Housing Types	Proposed Housing Types
Downtown Multifamily	(no change)
Infill Multifamily	**General Multifamily:** 3+ units in a single building (aligns with building code), does not look like a large house.
General Multifamily	
Multiplex (3-5 units, stacked), different lot sizes and dimensional standards depending on number of units	**Multiplex:** Multifamily that looks like a large house in a stacked configuration, including over-under duplexes, triplexes, and fourplexes.
Over-Under Duplex	
Standard Townhouse	**Attached Housing:** Townhomes and side-by-side duplexes.
Side-by-Side Duplex	
Urban Cottage	**Urban Detached:** Small, detached single-family homes & cottages.
Urban	
Large Urban	
General	
Suburban	**Suburban Detached:** Larger, detached single-family homes.
Large Suburban	
Estate	**Estate Detached:** Very large, detached single-family homes on large lots.
Large Estate	

2. **Update use permissions and dimensional standards to reflect development trends and feasibility.** The land use table in Loveland's Unified Development Code was amended in 2018 to accommodate the City's new Housing Palette (described above) and other features to determine the allowance of certain land uses in each zoning district. Rather

than acting as a quick reference to determine permissions, layers of distinctions make this table challenging to interpret, and the repetitive table structure complicates administration. By-right unit type allowance is often dependent upon designations of "in Complete Neighborhoods" or "in all other locations," with most uses labeled as "limited" or "adaptable" uses, each with minor variations in the definition. This complexity creates uncertainty about by-right feasibility, as developers must navigate overlapping criteria rather than clear baseline permissions.

Scale Thresholds are another well-meaning mechanism aimed at limiting building bulk and scale. Rather than establishing development standards that directly regulate the desired form of development, this system creates an extra step in the permitting process and adds unpredictability. Ultimately, the thresholds for building coverage and height incentivize lower density development even in the City's most urban zoning districts.

Finally, the dimensional standards in the Housing Palette are not supportive of current development trends and often stymie project feasibility. Minimum lot sizes and setbacks, for example, are scaled for large, undeveloped parcels rather than small-lot or urban infill.

Proposed short-term actions for this update strategy include several amendments to make the development code more clear, predictable, and aligned with modern development trends which will in turn create a more streamlined regulatory system sought by Prop 123. For example, simplifying land uses to parallel the Housing Palette consolidation and removing sub-area distinctions would eliminate excess table rows and improve readability.

3. **Recalibrate lot coverage thresholds to better support compact houses on small lots.** Similar to the dimensional standards described above for minimum lot size and setbacks, the lot coverage standards for housing in Loveland are designed to reinforce lower-density suburban tendencies. Right-sizing lot coverage thresholds for more urban housing typologies can support the small-lot development many new homebuyers are looking for. The flexibility for smaller lots also supports "Naturally Occurring Affordable Housing" (i.e. the upper end of Prop 123's Affordability Threshold) because the resulting homes are more modest and inherently cheaper due to smaller floor area.

   Proposed amendments for this short-term action include increasing the lot coverage limitations for by-right development. This may entail adjustments to the Scale Thresholds for Residential Zones, which currently require a more rigorous review process if the building coverage exceeds 45% regardless of the housing type, density, or underlying zone. The table below summarizes possible amendments for more urban-style housing types that rely on this flexibility.

Consolidated Housing Type	Min. Lot Area*	Min. Lot Width**	Max. Height	Max. Coverage
Multiplex	1,300 sf per unit	20 ft	38 ft	70%
Attached Housing	1,300 sf per unit	18 ft	35 ft (no change)	70%
Urban Detached	2,800 sf	alley: 30 ft no alley: 35 ft	30 ft	50%

**Maximum density will still be based on the underlying zoning district.*

***Infill development on existing lots will be exempt from minimum lot width requirements.*

4. **Adjust off-street parking requirements to accommodate multi-unit housing, smaller lots, and on-street parking alternatives.** Existing parking standards are propagating a car-dependent, dispersed urban fabric and holding back housing affordability and production. By modifying Loveland's parking standards to be more flexible and market-based, a more diverse range of housing products will become more feasible. Smaller units geared towards young adults and seniors, who often have fewer cars than the typical household, should not be required to provide the same amount of parking as a 3+ bedroom unit. Reducing parking requirements creates flexibility, reduces the amount of lot area needed for paved parking and garages, frees up more space for housing, allows for a more walkable community, and improves the financial feasibility of housing projects so that more housing can be built. Requiring fewer parking stalls for certain unit types doesn't necessarily mean there won't be parking; developers will often still build parking because of market demand and consumer expectations, but the amount and form of that parking can be adjusted depending on the type and location of the project and can be adjusted over time as we become less car-dependent.

   Proposed amendments for this short-term action include reduced parking minimums for more modest residential projects. Ratios for cottage clusters, multiplexes, and townhomes will likely be reduced to 1 space/unit with the ability to count on-street parking towards required parking either by-right or justified through a parking study. Parking ratios would also be reduced to 1 space/unit for any housing type that is affordable by design or through subsidy (see Prop 123 and Local Affordable Housing Incentives below).

5. **Develop small-lot infrastructure standards (currently in progress with Public Works).** Barriers to more affordable, small-lot development go beyond the UDC. The City's regulations for water, wastewater, and electrical service are also designed for greenfield development on larger suburban lots. In particular, utility spacing and clearance standards are unworkable for small-lot or multi-unit projects. Maintaining safe clearances and minimizing risk for future homeowners are important goals; however, the standards set in place to achieve these goals are often at odds with the construction of dense and affordable housing. Recognizing this, City public works staff is undertaking a separate effort to create small-lot infrastructure standards, which will be reviewed for consistency as amendments to streamline the UDC are drafted.

Long-Term Actions include more labor-intensive changes aimed at improving code usability, optimizing clarity and speed of development review, and enabling higher residential densities to fundamentally improve Loveland's housing supply. These actions are expected to take place in the next 1-5 years and are outlined here in response to the audit and outreach done as part of this project. Most actions are significant and geared toward addressing overarching issues that have been frequently raised during the initial phases of this project. Formally documenting these actions now is crucial to avoiding repeated work in the future.

1. **Modernize the Housing Cluster and Complete Neighborhood Standards to increase usability and development potential.** A more comprehensive simplification and reorganization of the UDC is expected to occur long-term to optimize unused regulatory tools like the Complete Neighborhood and Housing Cluster standards. The short-term action to simplify the Housing Palette will likely include a consolidation of clustered housing types. This action will not, however, make significant changes to the standards and process around those housing types beyond condensing them into a single “use.” Eventually, the City will make more holistic updates focused on modernizing the additional standards and process steps related to developing clustered housing.

   Similarly, the Complete Neighborhood standards need to be either drastically simplified or removed from the code entirely. The Complete Neighborhood standards were developed with good intentions and strive to mix specific amounts of housing diversity into developments but have become limiting and unused in practice. Long-term revision of these standards would focus on flexibility and scalability to better appeal to a range of development sizes and contexts. Alternative methods to encourage “complete neighborhood” characteristics like housing diversity, high-quality amenities, and neighborhood connectivity may also be embedded via mandatory or optional mechanisms in the UDC.

2. **Create process flowcharts and application examples to provide clearer expectations for applicants.** As a continuation of the primary focus of this project on streamlining the permitting process for affordable housing projects, the City intends to clarify and simplify the permitting process for all housing applications. Part of this effort will be the eventual creation of supplemental materials that will help applicants understand the process and expectations for housing developers, especially for first-time or small-scale developers who may be less familiar with the process.

   These additional materials will be external to the code, and accessible through the City’s website. They will likely include flowcharts for each permit type, updated application material lists with reference links to examples of these submittal materials, and example applications. When the time comes for this long-term action, further research will be done to assess what will be the most useful materials to produce.

3. **Apply targeted comprehensive plan updates to promote housing diversity and enable density increases in select zoning districts.** The low residential densities imposed by Loveland's existing comprehensive plan have been brought up repeatedly during this project as a major barrier to housing production, and one of the greatest contributing factors to the City's reliance on PUDs to develop denser, more affordable housing. Amending the comprehensive plan to allow for higher densities will not only make housing more affordable generally, but will also reduce reliance on the PUD process, which can be slow and labor-intensive for City staff. Allowing higher densities in the comprehensive plan will also open the door to the possibility of using these densities as incentives to encourage other desired housing outcomes such as diversity, connectivity, and affordability.

   Achieving this long-term goal will hinge on the community's willingness to approve such an amendment. Luckily, general public support has been voiced for such an action, thanks in large part to large-scale, ongoing public education around housing affordability. Hopefully this momentum will continue when the time comes to implement. A robust education and outreach campaign will be key to the success of this action and should be started as soon as possible.

Process Improvements

Development review processes for different application types are established in the UDC and carried out by Loveland's Development Review Team (DRT). Through a combination of application types (e.g. annexation, subdivision, site development plan, planned unit development) and decision tracks, the code outlines mandatory submittal materials, procedural steps like pre-application meetings between applicants and staff, requirements for public meetings and hearings, and determines how final decisions are made. Each step of the review process directly contributes to the overall review timeline established by Prop 123. The City has 90 calendar days from the time an application is deemed complete until permits are granted to the applicant.

Loveland currently directs certain affordable projects to be expedited to the extent feasible but does not provide a mechanism or clear process for meeting timelines required by Prop 123. A review of several affordable housing projects that would have required fast-tracked review showed that they exceeded Prop 123 timelines by months, if not more. Delays can be traced back to both inefficiencies in City processes and considerable resubmittal delays from applicant teams when re-submitting the projects.

Amendments to streamline the UDC described earlier will clarify project requirements and improve development feasibility. These measures will also improve the quality of applications

upon first submission and, in turn, should expedite the process itself but additional procedural improvements are necessary for the City to make swift permit decisions required by Prop 123.

Short-Term Actions regarding process improvements are intended to formalize a highly efficient and coordinated development review between Loveland's DRT and project applicants for Prop 123 eligible projects. More effective pre-application meetings, completeness checks, and internal escalation process for solving projects are among the immediate actions that are implementable with existing staff and resources.

1. **Establish a robust and predictable pre-application process.** While this process is spelled out in the existing code, in practice, it is not thoroughly executed due to limited staff resources and a lack of structured workflows. A more robust pre-application process will help improve coordination between project applicants and reviewers and ensure applications are adequately assembled from the beginning. First, a focused in-person pre-application meeting will help applicants and reviewers get on the same page early on and allow critical questions to be addressed. To make this meeting more effective, applicants may be asked to present more detailed information than what is required today and representation from all City reviewing departments will be necessary. Expectations and review timelines must also be clearly communicated to both reviewers and applicants.

   Assuming a more productive pre-application meeting, the materials submitted for the formal completeness check should inherently be more sufficient than what is typically received by the City. Still, improvements to the completeness check process itself must be made, which will ideally be led by a dedicated Development Coordinator who will conduct a thorough examination of the application before formally accepting the project and therefore starting the 90-day review clock.

2. **Develop a 90-day fast-track review flowchart with applicant and reviewer timelines for Prop 123 compliance.** A structured and enforced timeline for project reviews and applicant resubmittals must be established to ensure the 90-day timeline is met. These strict timelines will set expectations for all parties at the beginning of the process and will be predicated on a maximum of two review cycles. Limited timeline extensions will be built into the updated system in accordance with Prop 123.

3. **Provide an option to decouple site planning and platting review processes for subdivisions.** The current code includes several overlapping and, in some cases, concurrently or sequentially applied review processes. Specifically, the Subdivision or Plat Review is integrated with the Site Development Permit (SDP) process. This integration is problematic because the Site Development Permit is subject to a 90-day review clock, while the Subdivision Plat Review is not. This forces a decision on a process that is typically

not subject to time limitations within a strict deadline, which can lead to complications and potential delays.

The current combined process works well for a few savvy developers working on larger subdivisions with long timelines, ample budgets, and the ability to lay out all the details for horizontal and vertical development up front. Most developers, however, take issue with the combined platting and buildings and believe the requirement for architectural and electrical details early on is a huge issue. They also recognize that approval timelines for horizontal development (subdivision and infrastructure) are less consequential than the timeline to start vertical construction (site development plan) and therefore believe the processes should be separate.

For these reasons, the platting component of subdivision applications could, upon request of the applicant, be decoupled and processed without time constraints to allow for the complexities that arise with platting and infrastructure. Once the plat application is approved, the applicant will be able to move on to a separate SDP application process which must be completed in 90 calendar days. This adjustment will also allow developers to start geotechnical grading and site utility work as they enter the SDP process which is helpful for development phasing, labor coordination, and financing.

4. **Create an internal escalation process for problem solving, design alternatives, or interdepartmental conflicts.** Loveland's existing permit process of personnel responsibilities and procedures does not have an efficient way of addressing uncertainties that are bound to arise during development review. Moving forward, a standardized process for handling project-related questions, resolving conflicts between requirements and their respective departments, and assessing design alternatives will help to streamline development review by removing the "limbo" stage that can occur when no clear hierarchy of decision-making or authority exists.

5. **Review and update neighborhood outreach and appeal processes for affordable housing projects to reduce delays while ensuring transparency.** Currently, the City of Loveland does not require public outreach for application types subject to Prop 123 (e.g. site development plans, building permits, variances). However, it is recognized that certain neighborhood meeting requirements come into play for other affordable housing applications like Sketch Plats and Final Plats, which can be problematic for developers and staff. This process requires applicants to review and respond to dozens of individual comments—many of which are not based on specific code regulations—and face the repercussions of potential appeal. Moving forward, all affordable projects including those pursuing application types that are not subject to Prop 123 timelines may be exempted from public meetings provided the development is by-right and satisfies all the required development regulations.

Long-Term Actions to improve Loveland's development review process include software optimization and cultural changes within the DRT to ensure objective reviews.

1. **Implement a development tracking mechanism in Accela for staff and applicant visibility on timelines and milestones (in progress).** The City's new permitting software, Accela, can integrate development review status updates that are viewable to both staff and applicants. The City has started the process of testing these features, but due to additional staff training, software updates, and alignment with internal review workflows required for seamless integration, the City will strive to fully implement the development tracking mechanism beyond the June 2026 timeframe for the Prop 123 compliance project.
2. **Establish policies for development review staff including a requirement to cite specific standards in comments and redlines.** Current review protocol is loosely defined and enforced for DRT members commenting on applications moving through the City's development pipeline. In practice, many reviewers are free to comment and request changes on any component of a development proposal regardless of the issue being overseen by their department and often do so without reference to any particular standard.

   The development code can only formalize so much of Loveland's development review and permitting process. Eventually, the City will establish internal policies for how DRT members evaluate, redline, and comment on applications. Some examples include policies that limit reviewers' domain to their department's expertise and require specific citation of standards to which reviewers are evaluating compliance.

Prop 123 and Local Affordable Housing Incentives

Although the City offers financial incentives (fee waivers) and density bonuses for deeply affordable deed-restricted housing, no incentives of any kind exist for the affordability levels defined in Prop 123. A new suite of design incentives and development bonuses will be created for projects categorized as "Naturally Occurring Affordable Housing" provided the applicant can prove the project remains within the Prop 123 Affordability Thresholds by the end of the commitment cycle (i.e. for sale units must be affordable to 100% AMI; rentals must be affordable to 60% AMI).

Short-Term Actions include the allowance of modest increases in density and building coverage, architectural design relief, and parking reductions. The project team will work closely with local developers to ensure that any draft incentives are economically viable for a variety of smaller homes that can serve middle-income households.

1. **Create a new UDC section consolidating affordable housing incentives for all zones, including planned unit developments and conventional zoning.** This short-term action is primarily intended to create a logical and easy-to-find place for new incentives for "Naturally Occurring Affordable Housing" (NOAH) that is affordable by design.

   "Affordable by design" refers to housing that is lower cost due to its small size, simple layout, minimal finishes, and other design elements, rather than achieving affordability through subsidy. Subsidized affordable housing is complex and often costly to develop. It is typical for this type of housing to only be built by specialized developers. By making space within the UDC for more easily achieved affordable housing, Loveland will see more of this type of housing built as market-rate developers see more of a benefit in building smaller, simpler homes through incentives and simple funding mechanisms.

2. **Establish incentives to promote product diversity and mixed-use developments, encouraging naturally occurring affordable housing (NOAH).** As stated above, it is in Loveland's interest to incentivize smaller housing types that tend to be affordable to the income levels specified by Prop 123. Non-financial incentives will be designed to achieve a diverse mix of housing types within residential and mixed-use development. These incentives will be crafted in collaboration with local developers and carefully calibrated for economic feasibility. The goal is to create options that are flexible and scalable, rather than strict all-or-nothing requirements.

   New incentives for product diversity, mixed-use development, and NOAH may include:

   - Reduced parking ratios
   - Site design flexibility
   - Priority permit processing
   - Tiered density bonus up to 30% based on mix of housing products and affordability if no units are deed restricted. Product diversity, non-residential uses, or NOAH units must be built in the first phase.
   - Lot dimension and setback flexibility
   - Landscaping and open space reductions
   - Architectural flexibility for housing models
   - Use of narrower, lower-cost street standards for street segments serving a limited number of residences

Long-Term Actions are designed to optimize Loveland's affordable housing incentives and financing mechanisms for an array of housing and application types beyond those prioritized by Prop 123.

1. **Develop policies and regulations that enable homeownership opportunities in accessory dwelling units.** Currently, Loveland's ADU development standards and utility requirements

do not support fee-simple ownership of these units, meaning a homeowner cannot easily sell an ADU. Enabling this through a streamlined subdivision mechanism like "unit lot subdivision" along with simplified development and utility standards will help expand affordable homeownership options in the city. This strategy will support community members looking to buy a small home, and those looking to help pay for their existing home with revenue from an ADU.

2. **Pursue grants and other state funding programs to expand affordable housing tools.** Loveland is always looking for funding opportunities to expand the supply of affordable housing through multiple avenues. From new state programs to support affordable housing developers to creative financing mechanisms like community land trusts and shared-equity homeownership models, the City is committed to injecting capital into new homebuilding and lowering housing costs for renters and buyers.

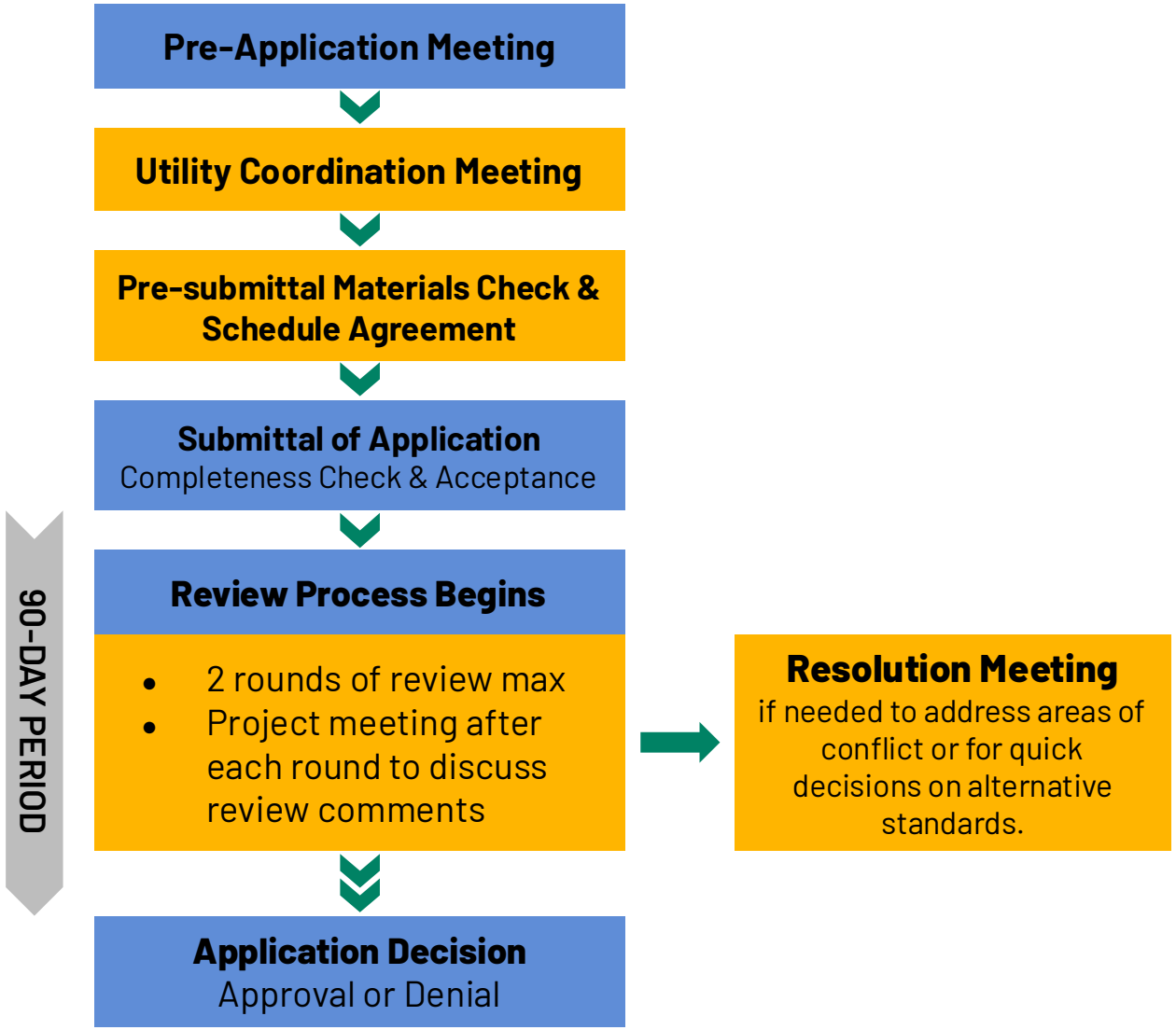
The update strategy outlined above provides achievable short- and long-term actions for the City of Loveland as it seeks to meet the requirements of Prop 123 by June 2026 and fully implement and support all forms of affordable housing in the years to come. The project team will be refining draft amendments with local stakeholders, testing development feasibility, and informing community members of the process between February and April. The amendment package of short-term actions is targeted for adoption in June.

Expedited Process Overview (proposed)

Current Process

New Collaborative Meetings

- 90-day expedited review process begins once application is accepted
- New collaborative meetings between City staff and the applicant to ensure project stays on expedited schedule





City of Loveland

PROPOSITION 123 AFFORDABLE HOUSING

Kerri Burchett, Principal Planner
Development Services

Tyler Quinn-Smith
Framework

March 24, 2026

Agenda

- Objective
- Background on Proposition 123 Requirements
- Update on Outreach and Progress
- Project Timeline
- Questions

City of Loveland

Why & What

Why are we here?

To provide an overview of progress on the Housing Needs Assessment, Proposition 123 compliance, & housing code amendments

What are we asking?

This presentation is for information purposes. Amendments to the UDC are tentatively scheduled for a City Council public hearing in June

City of Loveland

Proposition 123 Background

Voters passed Proposition 123 in 2022 to support affordable housing

Loveland opted-in to the program in 2023

Requirements:

- Increase the number of affordable housing units by 3% a year for 3 years, and
- Implement a 90-day expedited review process for qualified housing projects by the end of 2026.

Loveland's commitment = 82 units annually for 3 years (246 total units)

City of Loveland

Proposition 123 Background

Proposition 123 Thresholds

Affordability

- Rental units: households earning 60% or less AMI
- For-sale units: households earning 100% or less AMI
- In all cases, housing costs must be less than 30% of the household's monthly income

Qualifying Projects

1. Include at least 50% affordable housing units within the project
2. Be a qualifying application type identified by State

➢ Implications: the number of projects eligible for expedited review is expected to be relatively narrow.

City of Loveland

Proposition 123 Background

To implement Proposition 123 requirements, the City contracted with Framework to:

1. Evaluate review process and housing standards and identify challenges/barriers
2. Conduct outreach to local developers, builders, land use consultants and City development review team
3. Explore ways incentivize housing products that the City needs
4. Create an expedited 90-day review process for affordable housing projects

City of Loveland

Framework



JEFF ARANGO
PROJECT DIRECTOR
FRAMEWORK



TYLER QUINN-SMITH
PROJECT MANAGER
FRAMEWORK



EMILY PRESSPRICH
PLANNER/DESIGNER
FRAMEWORK



MATT CAMPBELL
PLANNER/DESIGNER
FRAMEWORK

Neighborhood Workshop



NEIL HELLER
PLANNER/ECONOMIST
NEIGHBORHOOD
WORKSHOP

Project Overview

Loveland is implementing Prop 123 in three key ways:

- Creating a 90-day expedited review process for affordable housing
- Adding clarity to the City's Unified Development Code
- Exploring incentives for affordable and diverse housing

Today, we are providing information on our progress and the direction forward as we pursue Prop 123 implementation.

Code Audit Completed

- Comprehensive review of housing standards, allowances, and processes in Title 17 and Title 18 (UDC)
- Reviewed the processing, timelines, and review comments of recently approved housing projects
- Compared UDC standards for small lots with other communities

Engagement Summary

Step 1: Listening & Learning

- Surveys, developer interviews, site visits, & staff workshop

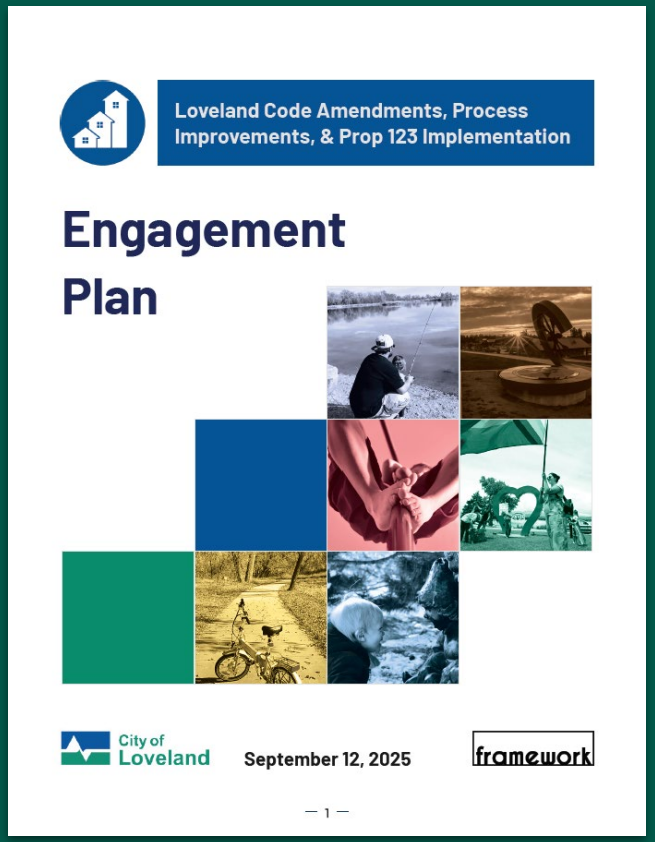
Step 2: Input & Public Awareness

- Process & amendment discussions with staff, developers, & designers

Step 3. Refinement & Public Awareness

- Focus group discussions & developer & staff workshop

Step 4. Review & Adoption



Engagement Findings

Code

- UDC is too complex and needs clearer standards
- Utility standards are not designed for small urban lots

Process

- Upfront coordination is needed between staff and applicants to problem solve
- Need a process for quick resolution when projects get stuck
- Applicants prefer Planned Unit Developments for flexibility

Update Strategy - Actions

PROCESS

- Establish a predictable pre-application process
- Develop a 90-day fast track review flowchart for Prop 123 compliance
- Create an internal resolution process

CODE

- Consolidate housing types & update standards to reflect development trends and feasibility
- Adjust off-street parking requirements for small housing types

Update Strategy – Actions

INCENTIVES

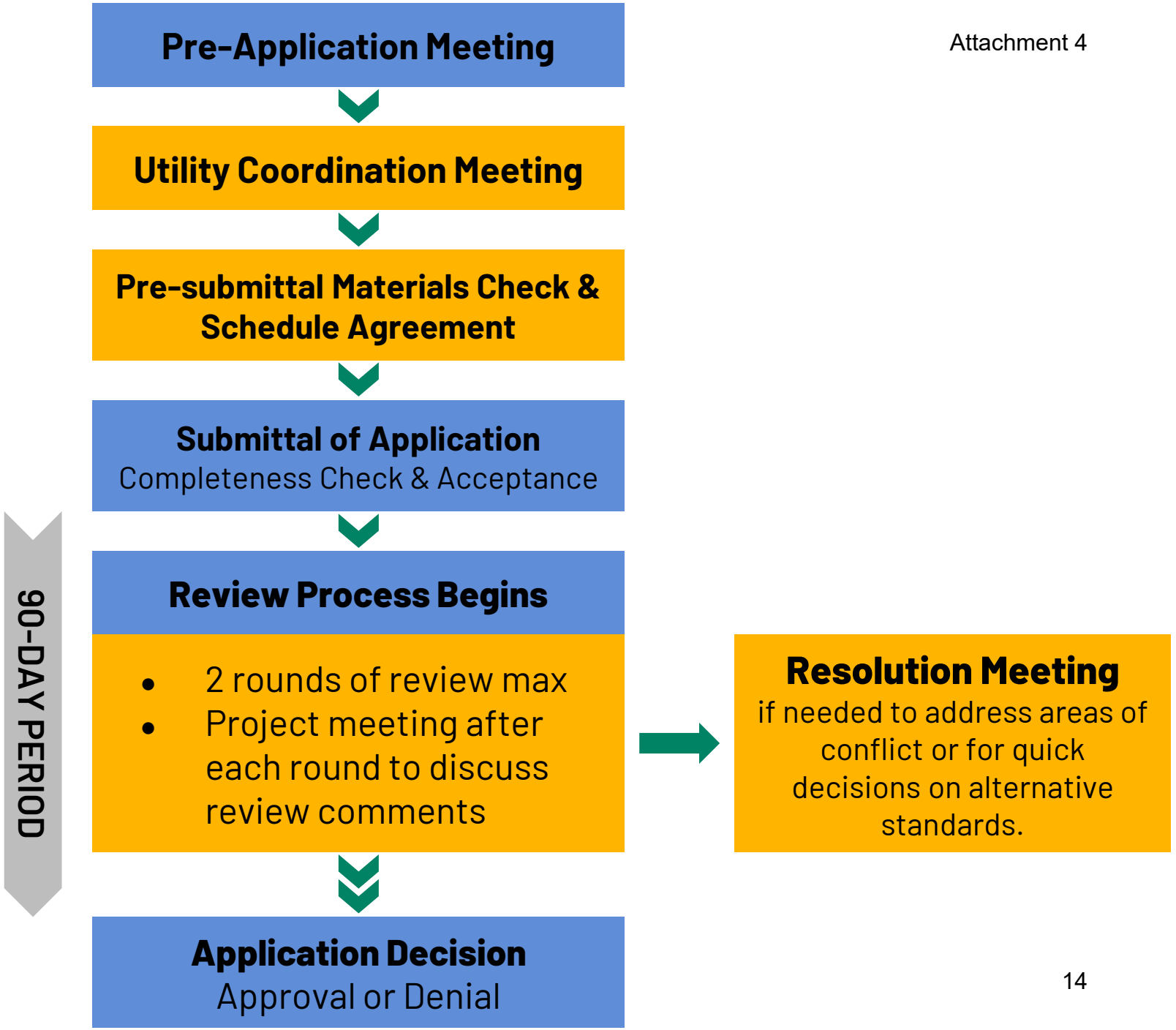
- Consolidate affordable housing incentives into one section
- Create targeted incentives for the housing Loveland needs
- Broaden the State's thresholds for expedited review for affordable housing

Expedited Process Overview

Current Process

New Collaborative Meetings

New collaborative meetings to ensure project stays on schedule



Code Updates – Housing Palette Example

Existing Single-Family Lot Types	Proposed Single-Family Lot Types
Urban Cottage	Cottage
Urban Large Urban	Urban
General Suburban Large Suburban	Suburban
Estate Large Estate	Estate
8 Single Family Lot Types	**4 Single Family Lot Types**

- Consolidate similar categories, remove redundancy, & increase flexibility
- Simplifying standards to improve code usability

Code Updates – revised standards

1. **Recalibrate development standards** for development feasibility and smaller lots
2. **Allow more housing types in more zones** while involving the neighborhood (via adaptable use process).
3. **Reduce off-street parking requirements** to align with smaller housing types

Code Updates – Example Affordability Incentives

Affordability Tier	Incentive
Product Diversity	Unit bonus based on Housing Needs Assessment
Prop 123 Qualifying projects	Unit bonuses Fast-track process Flexible development standards
Designated Affordable Housing Projects	Current incentives for deed restricted affordable projects

Project Timeline

- April - Construction Advisory Board
- May - Planning Commission & Affordable Housing Commission
- June - City Council

Adoption Goal: June 20th

If adopted by June 20, the City will be awarded $45,000 in grant funds for affordable housing!

City of Loveland

Council Questions

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City of Loveland

Thank You!

Kerri Burchett, Principal Planner
Development Services Department, Strategic Planning
Kerri.Burchett@cityofloveland.org

Tyler Quinn-Smith
Framework
Tyler@weareframework.com

MEETING DATE:	March 24, 2026
TO:	City Council
DEPARTMENT:	Public Works
DIRECTOR:	Will Jones
PRESENTER:	AnnaRose Cunningham, Senior Transportation Planner
STRATEGIC PLAN FOCUS AREA:	Economic Vitality Infrastructure & Transportation

AGENDA ITEM:
PRESENTATION REGARDING PASSENGER RAIL STUDY

RECOMMENDED CITY COUNCIL ACTION:
This item is informational, there is no recommended City Council action.

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	N/A
Deny the motion or take no action	N/A
Adopt a Modified Action	N/A
Refer back to Staff	N/A

SUMMARY:

Purpose: The purpose of this item is to update Loveland City Council on the status of Front Range Passenger Rail (FRPR), its different planning efforts and outline who is leading them. The goals of this presentation include creating awareness around the different elements of this project, garner feedback on the efforts, and identify a Loveland spokesperson for the FRPR District's outreach efforts.

Objective: The objective of this presentation is to provide information to City Council on the status of Front Range Passenger Rail (FRPR) and to identify a Loveland Spokesperson for the FRPR District's outreach efforts.

Impact: This presentation will provide direction and guidance for staff to move forward with the various elements of the FRPR.

Council Follow-up: Provide feedback on the efforts on the project.

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A
	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	N/A

STRATEGIC PLAN FOCUS AREA

Focus	Economic Vitality Infrastructure & Transportation
Strategy (if applicable)	Support & Expand Existing Businesses Provide a Multi-Modal Transportation System
Priority (if applicable)	Business Retention and Expansion Bicycle, Pedestrian & Public Transportation Options
Notes	

COUNCIL OR BOARD/COMMISSION REVIEW:
Type of Meeting: Transportation Advisory Board (TAB)

Date of Meeting: March 2, 2026

Resulting Vote: N/A

Discussion: Although no formal vote occurred, during the last TAB meeting and following several previous presentations on the FRPR, members expressed verbal support for the FRPR.

BACKGROUND:

History:
In 2021, the Colorado State Legislature passed SB 21-238, which created the FRPR District "for the purpose of planning, designing, developing, financing, constructing, operating, and maintaining a passenger rail system." The FRPR project is a 180-mile intercity rail corridor along Colorado's Front Range, proposed to operate along the BNSF Railway and Union Pacific Railroad freight rail corridors between Fort Collins and Pueblo. In 2024, the State Legislature passed SB 24-184 which advanced the first phase of FRPR: 'Joint Service'. Joint Service can be accomplished with existing revenue streams and does not require the FRPR District to go to

the Ballot to provide the three daily round trip service. Future ballot measures will seek to expand frequency to up to 10 trips per day and other station amenities. Additional details on the history and structure of the FRPR District have been detailed in the March 4, 2026, Memo to City Council included in the attachments.

Loveland Efforts

In preparation of the upcoming intercity passenger rail service, City of Loveland Staff have embarked on a station area visioning effort alongside the City of Fort Collins through a grant from the Colorado Department of Local Affairs. The station visioning effort seeks to ensure the future local Front Range Passenger Rail station meets the needs of the Loveland Community and is integrated into the fabric of the city. Station area visioning will consider how the station area connects to local transit, nearby streets, and community destinations. The purpose of the project is to define and advance a vision around the future station site and prepare for implementation considering impacts, identifying potential infrastructure needs, multimodal connectivity, and transit-oriented development opportunities while evaluation station area funding operations.

The station area visioning process, led by the consultant contracted through the DOLA grant, has been and will continue to be a collaborative effort across the City. The project is being managed through Transportation Engineering and Planning in Public Works, and the project team includes representatives from Economic Development, City of Loveland Transit, Development Services, and Communication and Engagement.

As part of the station area visioning process, the City of Loveland, supported by the consultant, will be conducting stakeholder and community outreach to inform the station area vision. Stakeholder outreach is anticipated to begin in the spring with the community visioning process beginning in the summer and include two community events. City staff and consultants will be finalizing the full outreach and communication plan in the upcoming weeks.

Front Range Passenger Rail District Efforts

The Front Range Passenger Rail District will provide an update on the status of FRPR and future District initiatives. The presentation will cover the benefits of Front Range rail, both for cities and for residents, and outline their path forward, including exploring a District ballot question in 2026. The District will review the outreach plan for bringing a question to the ballot, an implementation plan which links funding to service outcomes, and a financial plan which describes how funds will be managed, allocated, and safeguarded. The District will review the Local Return program which will provide funding to municipalities to support station area elements including construction and operations. Additionally, the District is requesting a letter of support supporting station-area visioning efforts.

Outreach and Notification Efforts: The FRPR District will engage in district-wide community outreach efforts over the coming months to prepare for the anticipated ballot initiative. The first of these opportunities in the City of Loveland will be on April 16, 2026, at a District led town hall in which they are requesting a local elected official speak to the effect of the FRPR on the local community. An overview of the anticipated timeline and engagement opportunities is provided in Attachment 2.

Conditions met/or anticipated: N/A

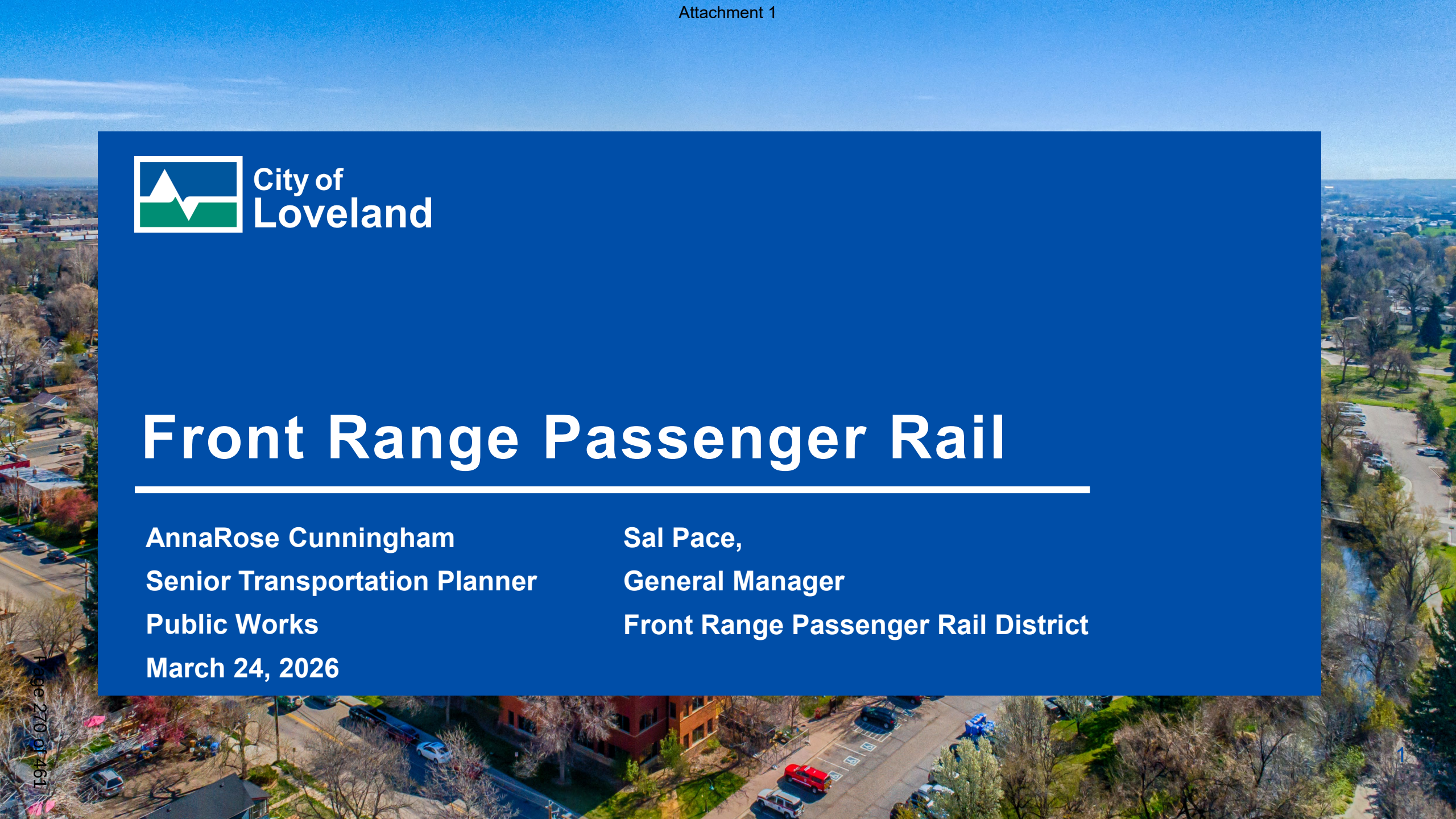
Start and End Dates (of studies, design, construction, or in service/operational): N/A

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Att 1 Presentation
Att 2 Loveland FRPR Memo



City of Loveland

Front Range Passenger Rail

AnnaRose Cunningham
Senior Transportation Planner
Public Works

Sal Pace,
General Manager
Front Range Passenger Rail District

March 24, 2026

Agenda

Front Range Passenger Rail District Update

- Background and Reasoning for Rail
- Upcoming Legislation and Ballot Initiative
- District Next Steps

Loveland Led Station Planning Efforts

FRPR Engagement Timeline

City of Loveland

Why & What

Why are we here?

- Update City Council on the status of Front Range Passenger Rail and related Station Area Planning Efforts.
- Create awareness regarding District vs. Loveland led efforts.

What are we asking?

- Identify a Councilmember spokesperson for Front Range Passenger Rail District outreach efforts.
- Determine if City Council is supportive of providing general approval of the station planning.

City of Loveland



About the Front Range Passenger Rail District

- Created by the Colorado General Assembly in 2021
- Empowered to refer tax question for voter approval
- Statutory direction to plan, finance, construct and operate intercity passenger rail from state line to state line

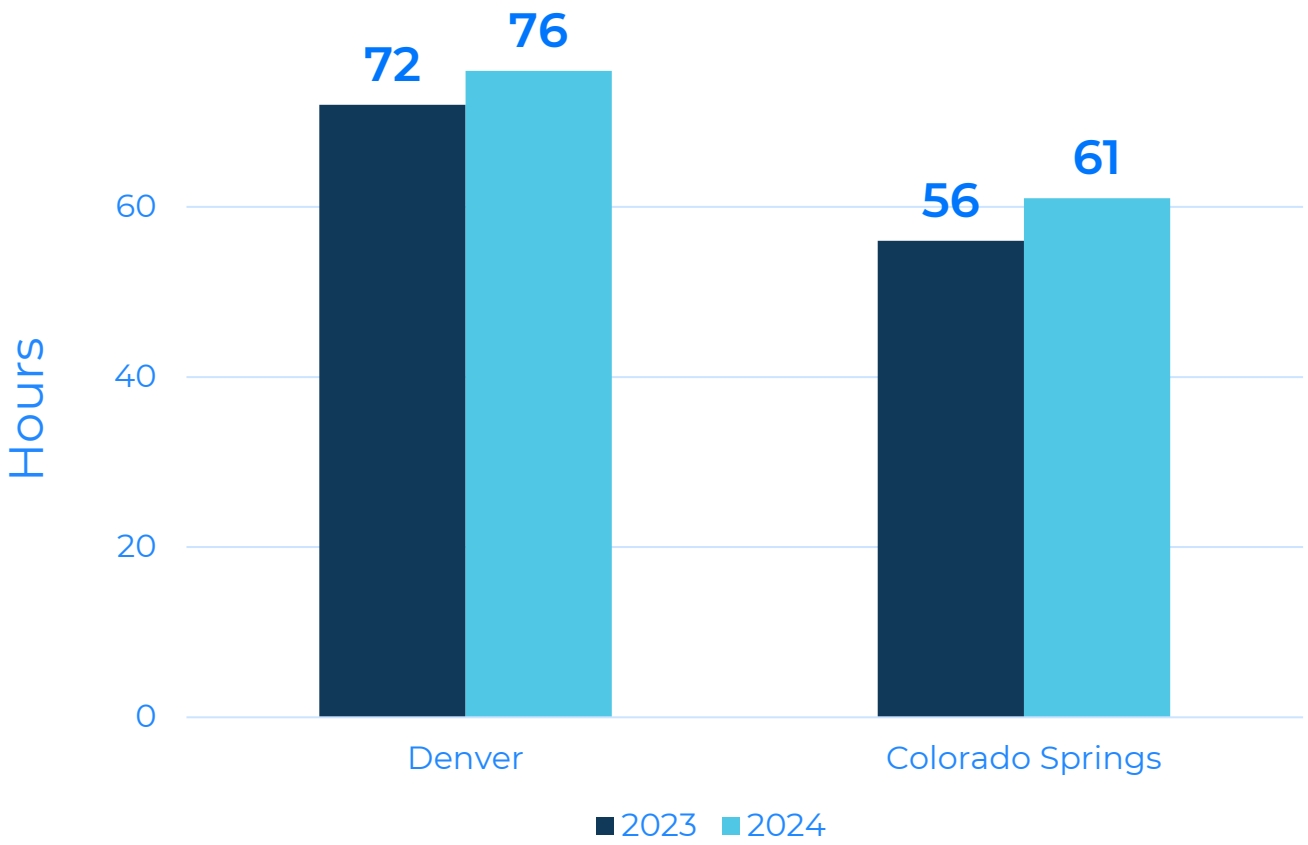
Why Front Range Rail?

Front Range Rail will benefit every Front Range resident by:

- **Taking Cars Off I-25**
- **Improving air quality**
- **Lowering household transportation costs**

Why Front Range Rail: Taking Cars Off I-25

Annual Person-Hours of Delay per Commuter



Commuter delays are **increasing year over year.** Denver metro commutes are delayed 76 hours – almost **two full work weeks.**



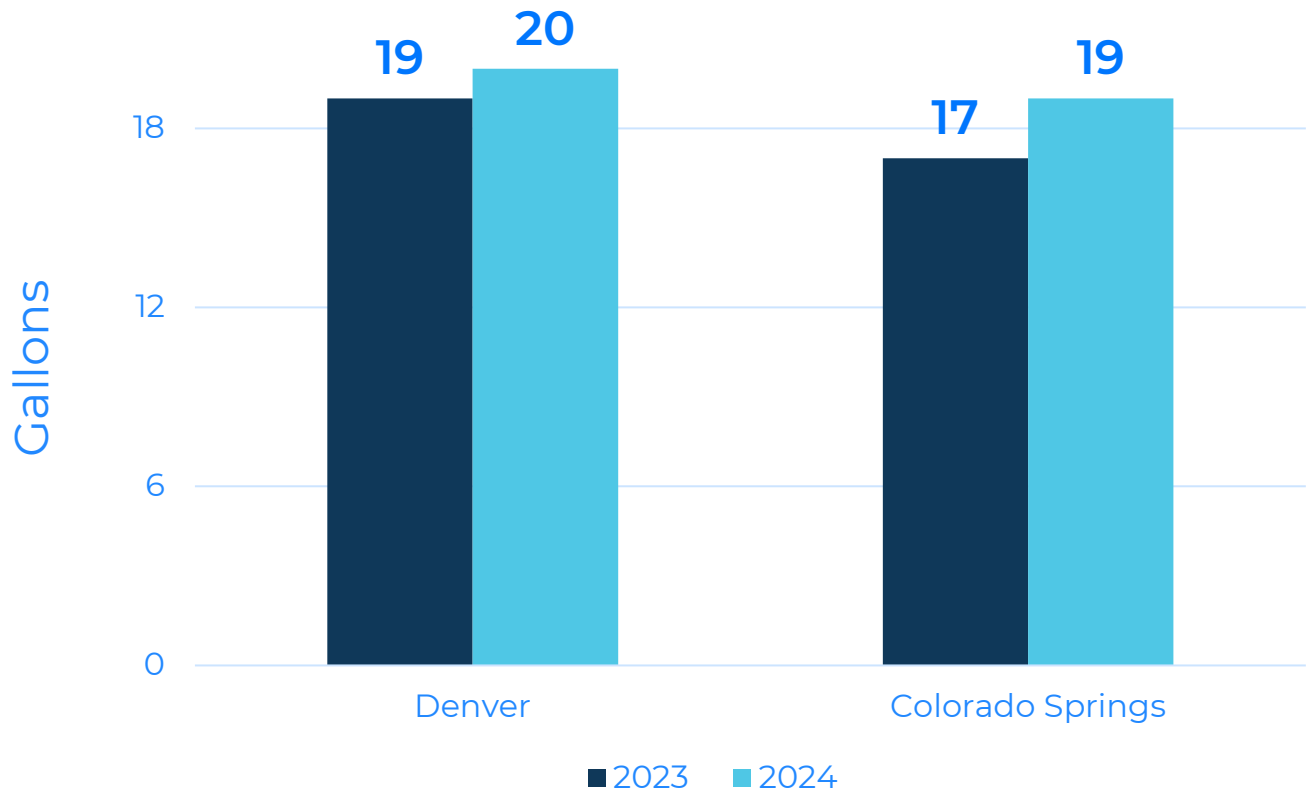
*Source: 2025 Urban Mobility Report

FRPR FRONT RANGE PASSENGER RAIL

Why Front Range Rail: Improve Air Quality

Fuel consumption is **increasing year over year.** In 2024, the average Denver metro commuter consumed an excess of 20 gallons **just because of traffic delays.**

Excess Fuel Consumed per Commuter

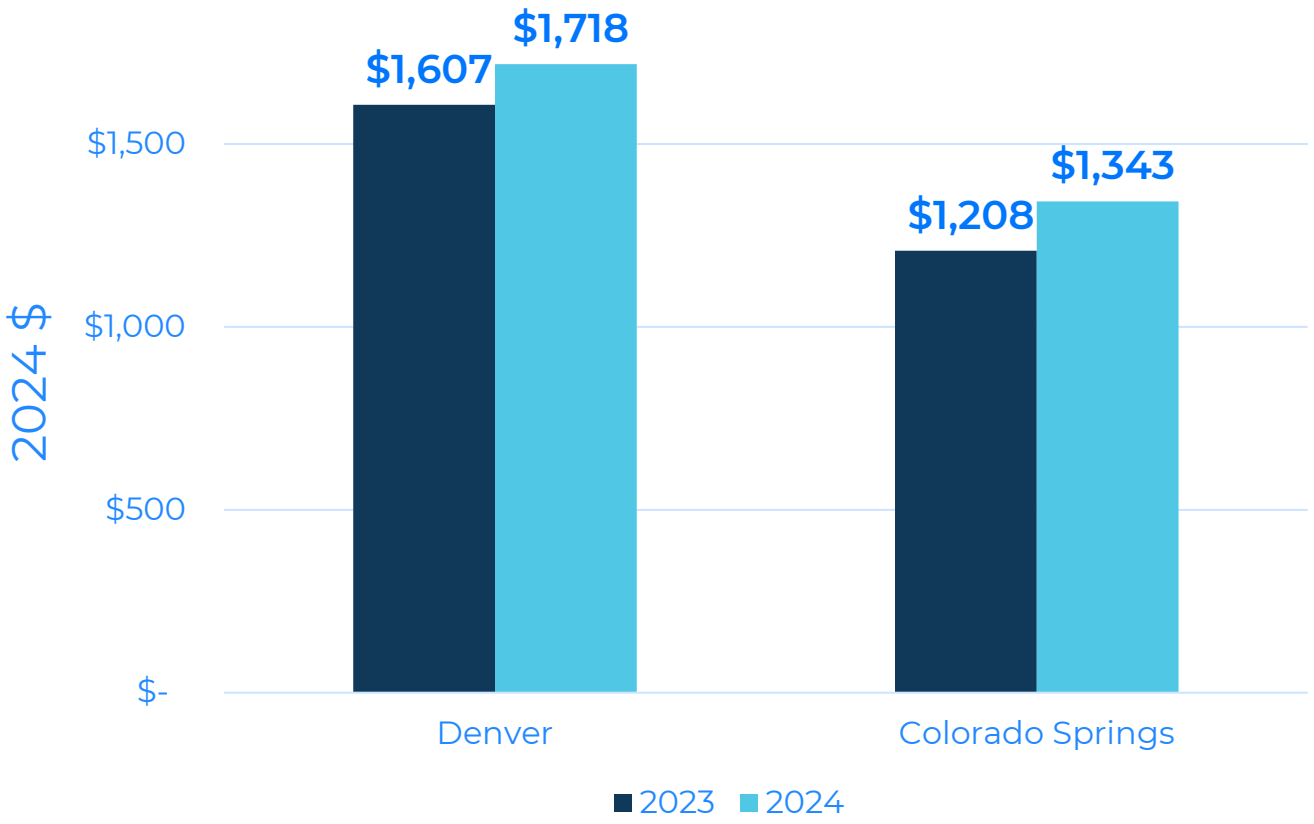


*Source: 2025 Urban Mobility Report

FRPR FRONT RANGE PASSENGER RAIL

Why Front Range Rail: Reduce Costs

Annual Congestion Cost per Commuter





Congestion costs are **increasing year over year** for commuters. In 2024, the congestion cost on the average Denver metro commuter was $1,718.

FRPR FRONT RANGE PASSENGER RAIL



Moving Forward: The Front Range Passenger Rail District is exploring a 2026 ballot question

The plan includes...

Stakeholder Engagement

Complying with statutory mandate for outreach ahead of ballot referral.

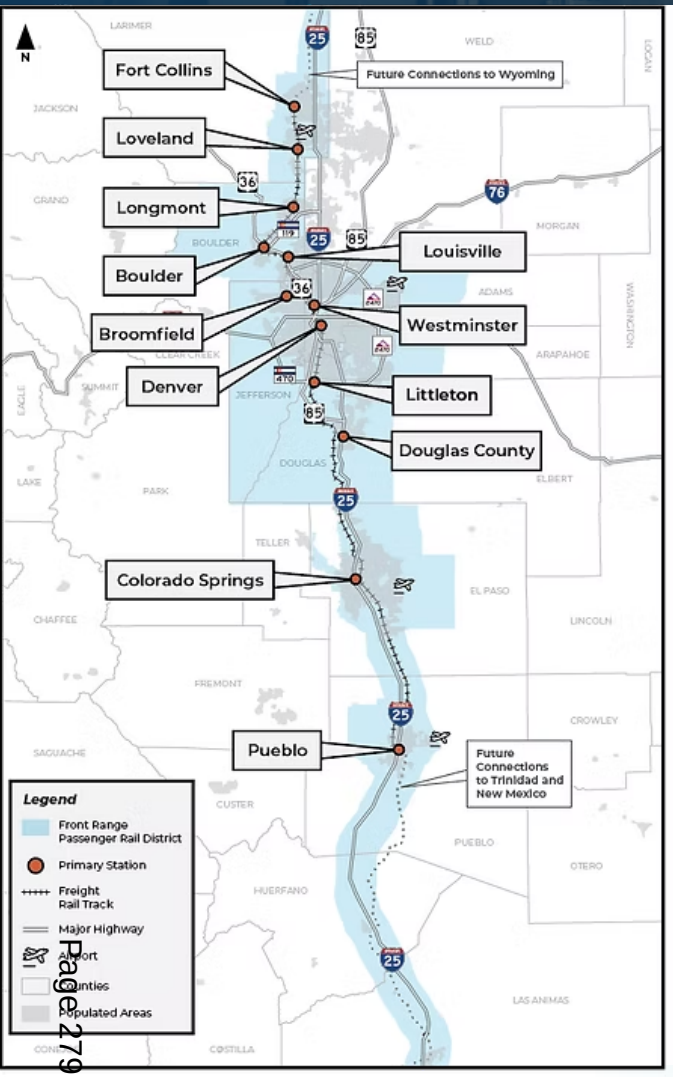
Results-Oriented Approach

Commitment to an open and transparent public process.

Online Engagement

Online Engagement Platform launches in January 2026.

Joint Service: Accelerates Service Delivery



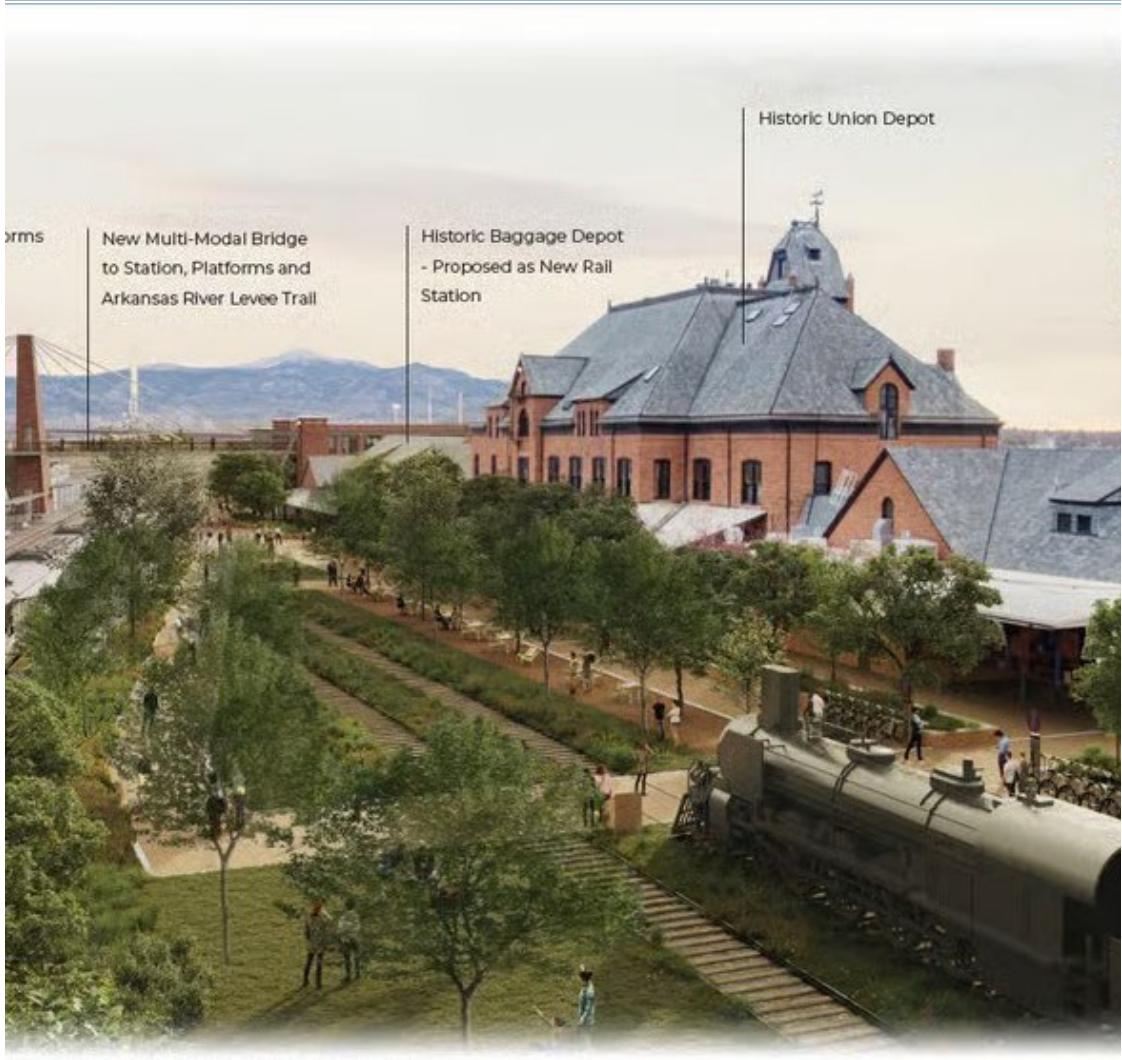
- Starter Service: 3 Daily Round Trips by 2029 (Denver–Fort Collins)
- Capital Build-Out Fully Funded by RTD & State Enterprises
- Ballot Funds Go Directly to Station & Service Expansion



Local Return

Millions of Dollars Sent Annually to Municipalities

- Purpose: Support local vision while strengthening downtown communities
- Community controlled Funds for Stations, Connectivity & Placemaking
- Local communities maintain local control over station area ownership and management





Financing Plan

Two documents are being developed to safeguard taxpayers' investment:

- **Implementation Plan** links funding to service outcomes
- **Financial Plan** describes how funds will be managed, allocated, and safeguarded



Next Steps

- **Branding exercise:** the District is exploring the public service name of the line
- **Agreements with freight railroads and public-facing Operating Plan:** showing project viability
- **Station-Area Visioning:** adopted by local municipalities showing intent to partner

Loveland Led Station Area Planning

Grant funded through the Department of Local Affairs in partnership with Fort Collins

Station Area Visioning

Locally with direction from FRPR District.

- Coordination across City Departments
- Potential improvements to surrounding area
- Transit and multimodal connectivity updates
- Cost estimates for station area projects

Stakeholder Outreach

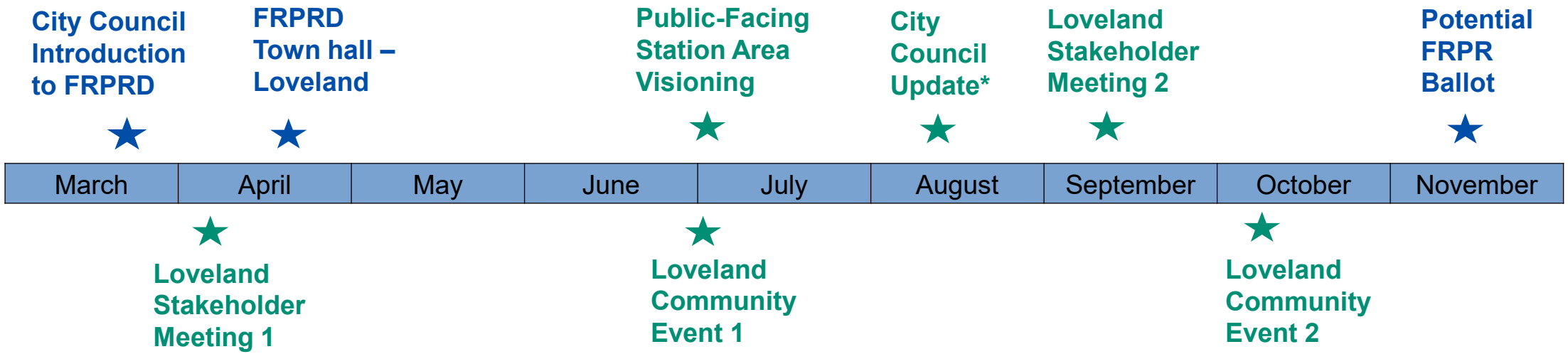
Upcoming Loveland stakeholder and community outreach

- Loveland Stakeholder Meeting
- Station Area Visioning and FRPR Outreach through Fall 2026

City of Loveland

Timeline

Front Range Passenger Rail: Loveland Station Area Planning Engagement Timeline



*Additional City Council update upon project closeout

★ FRPRD District Led Efforts

★ City of Loveland Led Efforts

City of Loveland

Why & What

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City of Loveland

City of Loveland

Council Questions

City of Loveland

Thank You!

AnnaRose Cunningham,
Senior Transportation Planner
City of Loveland Public Works
AnnaRose.Cunningham@cityofloveland.org

Sal Pace
General Manager
Front Range Passenger Rail District
INFO@FRPRDISTRICT.COM

City of Loveland

Public Works Department
2525 W. 1st Street | Loveland, CO 80537
970-962-2524 | TDD: 970-962-2620
PublicWorksInfo@CityofLoveland.org

Memorandum

To:	City of Loveland City Council
From:	AnnaRose Cunningham, Senior Transportation Planner
CC:	Jim Thompson, Rod Wensing, Will Jones
Date:	March 3, 2026
Subject:	Front Range Passenger Rail

Memo Purpose

The Front Range Passenger Rail District (FRPR District), in coordination with City of Loveland staff, will provide a presentation to the Loveland City Council on March 24, 2026. As there are multiple efforts occurring simultaneously, this memo is intended to offer background information on the FRPR District, including relevant legislation, current planning efforts undertaken by both the FRPR District and the City of Loveland, and is intended to prepare the Council for an informed and productive discussion regarding the future of inter-city passenger rail service in Northern Colorado.

FRPR and Joint Service Background

In 2021, the Colorado State Legislature passed SB 21-238, which created the FRPR District "for the purpose of planning, designing, developing, financing, constructing, operating, and maintaining a passenger rail system." The FRPR project is a 180-mile intercity rail corridor along Colorado's Front Range urban corridor proposed to operate along the BNSF Railway and Union Pacific Railroad freight rail corridors between Fort Collins and Pueblo[1]. The full project will include stations in Fort Collins, Loveland, Longmont, Boulder, Louisville, Broomfield, Westminster, Denver, Littleton, Doulgas County, Colorado Springs, and Pueblo. The FRPR District is governed by a board of directors with 17 voting and 7 non-voting members. The North Front Range region is represented by Jon Mallo of Loveland and Tricia Canonico of Fort Collins. In 2024, the State Legislature passed SB 24-184 which advanced the first phase of FRPR referred to as 'Joint Service' Joint Service was formulated through an Inter-Governmental Agreement with the Colorado Department of Transportation (CDOT), Clean Transit Enterprise (CTE), Colorado Transportation Investment Office (CTIO), RTD, the Governor's Office, and FRPR District. Joint Service can be accomplished with existing revenue streams and does not require the FRPR District to go to the Ballot to provide the three daily round trip service. Future ballot measures will seek to expand frequency to up to 10 trips per day and other station amenities.

[1] See Front Range Passenger Rail District Boundary Map in Attachment #1: *City of Loveland Passenger Rail Station Planning Information Packet*

CDOT/FRPR District Led Planning Efforts

The Front Range Corridor is nearing completion of Step 2 (Service Development Plan or 'SDP') of the FRA's three-step Corridor Identification and Development (Corridor ID) Program[2] to facilitate the development of inter-city passenger rail. The SDP outlines service details including frequencies, station markets, and capital needs. Following completion of the SDP, the Front Range Corridor will enter Step 3 of the CID program: Preliminary Engineering/ Environmental Permitting. Step 3 is anticipated to begin in early 2027 and advance capital projects for prioritized funding under the Federal-State Partnership Program.

The station area analysis chapter of the SDP references Amtrak and the Federal Railroad Administration (FRA) planning guidance, as these contain the most relevant and complete principles for planning intercity passenger rail stations, aligning station facilities with forecasted ridership. Beyond the SDP, further station area planning is needed to identify details such as platform location, station building, parking, pick-up/drop-off, multi-modal connectivity and transit-oriented development opportunities. The FRPR District and project partners are working to advance visions for all FRPR station areas by the summer of 2026 in preparation for a potential November ballot initiative. Station communities would be responsible for funding station improvements except for the platform/platform access and work within the railroad right-of-way. Through the proposed district wide sales tax, the FRPR District would collect revenue to be dispersed to station communities annually based on community population as outlined in Attachment #2: *FRPRD Local Return Program*. These funds would support the design, construction, operation, and maintenance of the passenger rail station as well as supporting broader station area investments over a 25-year period.

Further information regarding planning efforts led by the FRPR District can be found at ridethefrontrange.com.

City of Loveland Led Planning Efforts

As a result of FRPR's work, the City of Loveland is beginning initial stages of planning for FRPR service, including the first phase 'Joint Service', which could be delivered by 2029 including three daily round trip trains between Denver and Fort Collins (including Loveland and other intermediate stops). The City and CDOT/FRPR District evaluated four initial station sites through the Service Development Planning and Joint Service process. The City of Loveland (through a joint agreement with City of Fort Collins) has contracted with AECOM, a professional services firm experienced in supporting passenger rail station planning, to advance station area location evaluation and planning for FRPR. AECOM will coordinate with the FRPR District and Joint Service partners to advance a station area vision, including potential improvements that create a safe, accessible and connected station area reflecting the City of Loveland's priorities. Projects and/or initiatives will be aligned to phased expansion of the FRPR service, informing a vision for station area evolution over time. Planning will estimate costs for station area projects, in line with FRPR District policy guidance.

Over the next several months, the AECOM team and City staff will solicit feedback from stakeholders and community members with the goal of identifying key items such as multimodal connections, transit-oriented development opportunities and more, aligned with near-, mid- and long-term horizons for FRPR.

Next Steps

The City of Loveland, FRPR District, and project partners are working simultaneously to advance the FRPR project. A timeline of project elements is included in Attachment #3 and illustrates the work being

[2] Corridor Identification and Development Program | FRA

completed by each partner (City of Loveland, FRPR District, and CDOT). The advancement of this project relies heavily on engaging the members of the Loveland community and affected stakeholders. A preliminary timeline of Loveland's Station Area Planning Engagement is included on Page 2 of Attachment #3. AECOM will be providing a detailed public involvement plan by Spring 2026, details will be provided once available. City of Loveland staff are also evaluating what additional planning efforts may be needed to facilitate potential future station including but not limited to transit and mobility planning.

Attachments:

1. City of Loveland Passenger Rail Station Planning Information Packet
2. FRPR District Local Return Program - Draft
3. Front Range Passenger Rail Progress and Engagement Timeline

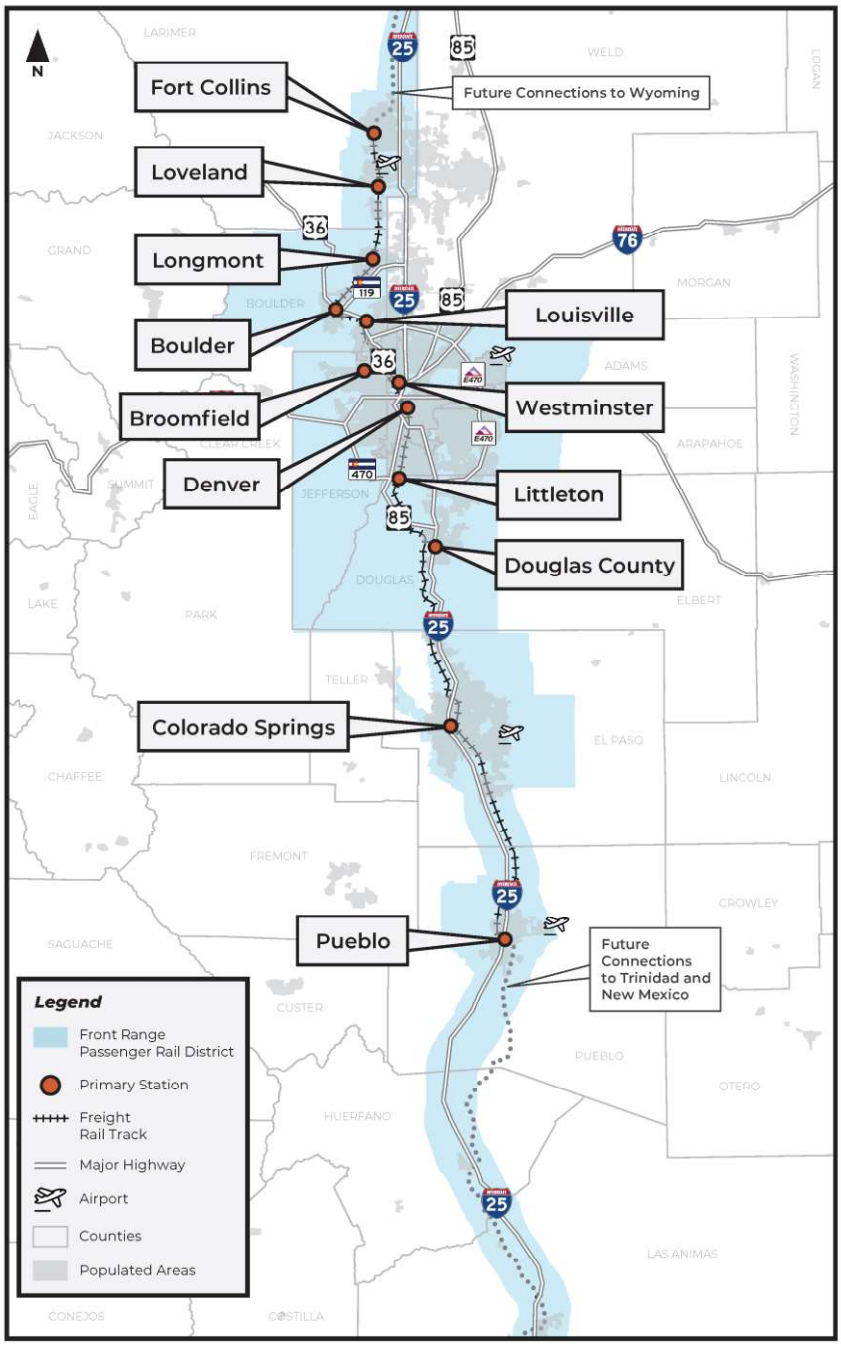
City of Loveland

Public Works Department
2525 W. 1st Street | Loveland, CO 80537
970-962-2524 | TDD: 970-962-2620
PublicWorksInfo@CityofLoveland.org

City of Loveland Passenger Rail Station Planning

Information Packet

Front Range Passenger Rail (FRPR) District Boundary



Elements of Intercity Rail: Station Area Zones

The Front Range Passenger Rail District (FRPRD) is partnering with local communities to advance station planning. Successful station areas are more than the train platform — they are safe, convenient, and welcoming community hubs that support ridership and local economic development.

FRPRD will develop and fund Zone 1: Station Core including platform, rail operations, safety, and systemwide standards, while municipalities guide Zones 2-4 including first-/last-mile access, land use, and development, much of which will occur after funding is secured to implement the system. Zone 2-4 elements would receive funding support via the ballot initiative disbursements.

FRPR District Led:

- Zone 1: Station Core

City of Loveland Led:

- Zone 2: Station Facility & Immediate Surroundings
- Zone 3: Multimodal Connections & Access
- Zone 4: Station Area Development & Placemaking

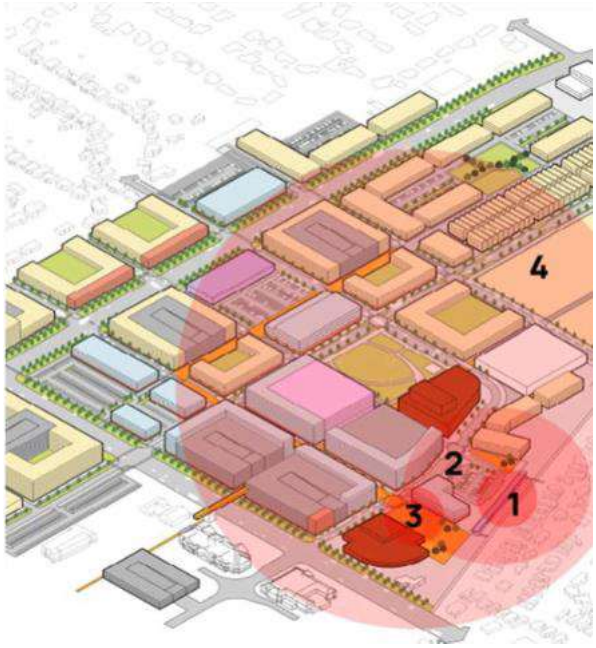


Figure 1. Representative station zone graphic.

Zone 1 Station Area Elements

Zone 1 elements make up the station core and represent the transit interface. These elements must be safe, functional, and consistent across station locations. These elements include:

- Platform
- Canopy
- Ticketing
- ADA Access
- Wayfinding

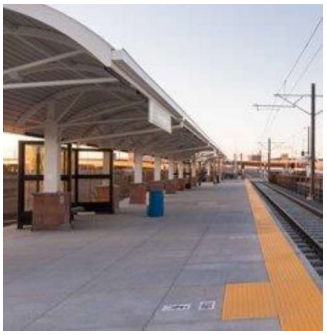


Figure 2: Rail Platform with Canopy



Figure 3: Ticket Vending Machine



Figure 4: ADA Access

Zone 2 Station Area Elements

Zone 2 elements make up the station facility and immediate surroundings. This is the area where the system has a direct place making opportunity and where quality and creative activation come together to support both riders and the community. Zone 2 elements include:

- Station Building
- Drop-off Areas
- Bicycle Parking
- Transit Connections



Figure 5: Station Building



Figure 6: Bike Lockers



Figure 7: Bus Bays with Shelters

Zone 3 Station Area Elements

Zone 3 elements make up multimodal connections and access. This is the transition point between passengers and their intended final destinations. Zone 3 elements include:

- Pedestrian Realm
- Bicycle Infrastructure
- Rideshare
- Local Transit
- Parking
- Public Realm Improvements



Figure 8: Park-n-Ride lot with local transit connections



Figure 9: Bike Lane

Zone 4 Station Area Elements

Zone 4 elements make up the larger station area development and represent intentional placemaking. This area seeks to spur economic development, which aids in creating transit-oriented development in addition to the construction of a new transit stop. Zone 4 elements include:

- Land Use
- Zoning
- TOD
- Economic Development
- Public Realm/Placemaking



Figure 10: Transit Oriented Development next to rail line

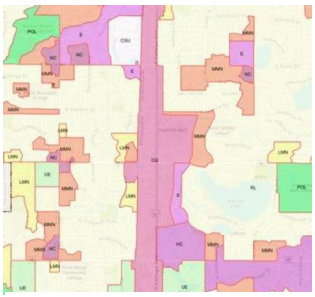


Figure 11: Current Zoning Map

Local Return Program – DRAFT

Station Planning and Funding Principles

Front Range Passenger Rail District (FRPRD)

Purpose

The Local Return Program follows months of input and feedback from FRPRD Board members and Station Partners, which include the municipalities and communities identified for FRPRD stations. This program and the principles identified below simplifies implementation, reduces administrative requirements, and preserves local flexibility while ensuring high-quality station delivery and clear public understanding across the corridor. The Local Return Program is optional, and Principle 4 below identifies the path for Station Partners that do not wish to participate in the program.

Principle 1: Local Return Funding

Following voter approval of a regional funding measure, FRPRD will provide annual funding for a 25-year period to each community hosting a passenger rail station, referred to as the Local Return.

Local Return funding must support the design, construction, operation, and maintenance of a passenger rail station, and may support broader station-area investments that enhance access, connectivity, and functionality, including multimodal access and first- and last-mile improvements. The train system's essential components, such as the platforms, sidings, canopies and ADA access to the platforms, will mostly lie within the Class 1 railroad right-of-way and be paid for by FRPRD separately.

Final funding conditions, scopes, and obligations for the Local Return Program will be formalized through an Intergovernmental Agreement (IGA) following voter approval of the referred ballot question.

Local Return funding amounts will be awarded for 25 years after ballot passage and will be based on community population:

- **Over 700,000:** $4.0 million annually
- **Over 300,000:** $3.5 million annually
- **Over 99,000:** $3.0 million annually
- **Over 75,000:** $2.5 million annually
- **Over 20,000:** $2.0 million annually
- **Under 20,000:** $1.5 million annually

Population will be determined using the most recent census or state demographic estimates.

Principle 2: Station Area Visioning and Public-Facing Materials

A station area visioning process is needed for every station identified in the Front Range Passenger Rail system.

- Visioning will occur between February and the beginning of June 2026.
- Station Partners may choose to lead or co-lead their own visioning process, or FRPRD will lead the process if a community prefers not to do so.
- Station Partners are not required to independently resource or manage the visioning process.

As part of station area visioning, FRPRD will prepare a uniform, graphic, public-facing station vision for every station.

- Vision materials will be consistent across the corridor and designed for general public understanding.
- Materials may reflect either community-led or District-led input but will be finalized by the FRPRD to ensure consistency.

The purpose of visioning is to establish a shared understanding of how each station and surrounding area could function and evolve over time.

Principle 3: Incentive for Community-Endorsed Station Vision

Any Station Partner that enters into an MOU or other agreement with FRPRD endorsing its station area vision by June 30, 2026 will receive an additional 10% increase to its annual Local Return funding amount.

- The agreement documents intent only and does not lock in final designs, funding allocations, or implementation obligations.
- Final funding and implementation details will be established after ballot passage.

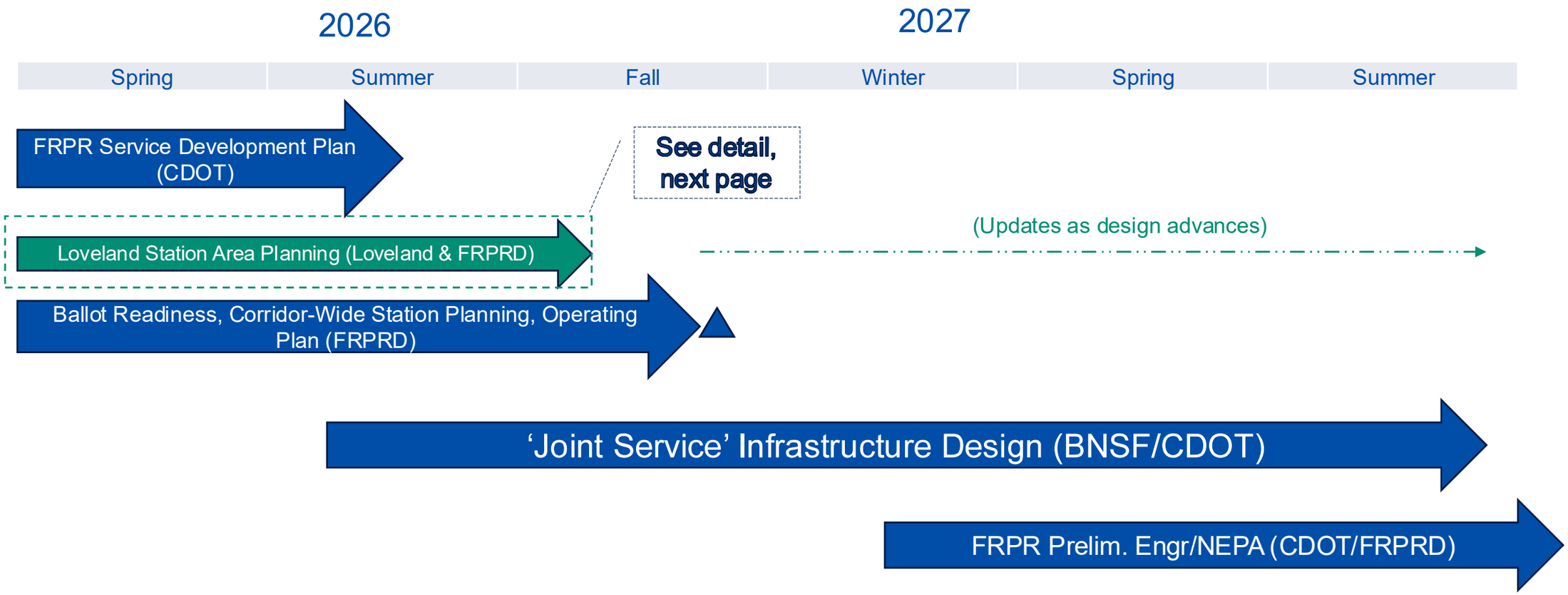
Principle 4: Minimum Station Delivery

If a Station Partner elects not to accept the Local Return funding, the District will deliver, operate and maintain a basic station and platform sufficient to support safe, accessible passenger rail service. Under this scenario, the Station Partner will be included in planning for the station delivery in their community, including the planning, design and construction components.

Additional Clarifications

- Station Partners are not required to enter into MOUs ahead of ballot referral to receive the base amount of annual Local Return funding.
- Station Partners are not required to contribute to ballot access costs.
- Station area visioning is needed, but community leadership is optional.
- The 10% incentive is tied solely to endorsement of the station vision by June 30, 2026.

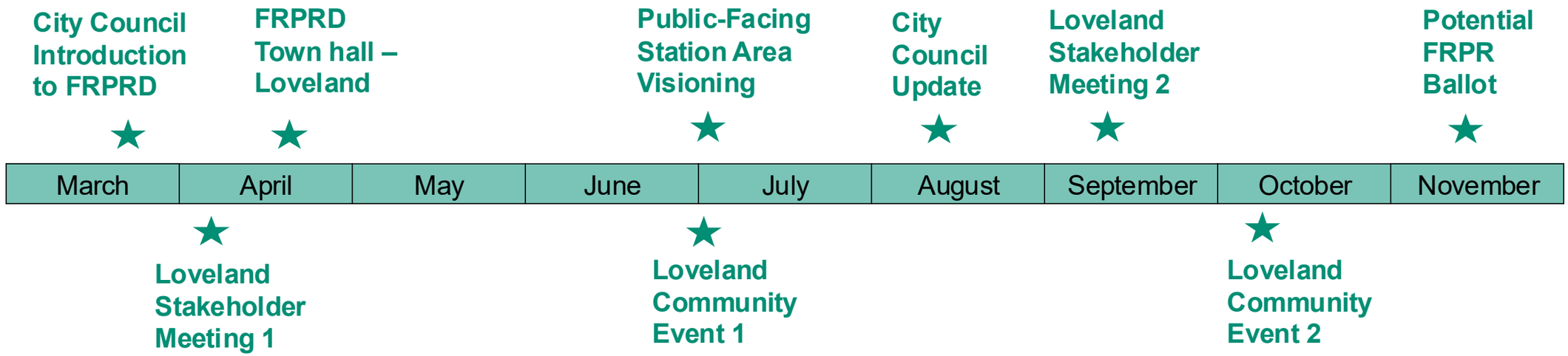
Front Range Passenger Rail Project Timeline (Responsibility)



City of Loveland

▲ (if a 'GO') – Ballot Initiative

Front Range Passenger Rail: Loveland Station Area Planning Engagement



City of Loveland

MEETING DATE:	March 24, 2026
TO:	City Council
DEPARTMENT:	City Manager's Office
DIRECTOR:	Jim Thompson
PRESENTER:	Police Chief Doran, Judge Edgley, City Attorney Junglas
STRATEGIC PLAN FOCUS AREA:	Public Safety Innovation & Organizational Excellence

AGENDA ITEM:
PRESENTATION REGARDING THE RULE OF FOUR SCORECARD REQUEST ON LOVELAND POLICE DEPARTMENT AND MUNICIPAL COURT DATA

RECOMMENDED CITY COUNCIL ACTION:
As this is an information only item, there is no recommended City Council action from staff

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	N/A
Deny the motion or take no action	N/A
Adopt a Modified Action	N/A
Refer back to Staff	N/A

SUMMARY:

Purpose: The purpose of this item is to bring forward the Rule of Four Scorecard presentation requested by Councilmember Light-Kovacs per the Rule of Four process from February 3, 2026. The Scorecard outlines background information, options for Council consideration, implementation requirements, and estimated staffing and budget and impacts to the City.

Objective: The objective of this Scorecard presentation is to provide information based on the Rule of Four Request and allow Council to deliberate and decide which option they would prefer to move forward on, given the scope of resources and estimations by staff.

Impact: The impact of this Scorecard presentation would depend on whether City Council wishes to move forward with pursuing amendments recommendations to Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a ‘Services-First’ enforcement model, requiring officers to provide resource information or transportation to

support services prior to citation and implementation of a data-collection framework to evaluate Ordinance impacts and a formal report on diversionary programs that allow for fine reduction or forgiveness mased on meaningful service engagement.

Rule of 4 Options - Police & CAO Scorecard:

Option 1: Keep the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) as written, placing no additional requirements on the city staff, City Attorney, Municipal Judge, or police department.

Option 2: Keep the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) as written. Create a data collection component and stipulate reporting mechanisms/timeframes. This would include the police pulling arrest and citation data, the city attorney matching every citation to a plea deal, dismissal, or trial recommendation, and the municipal judge detailing the sentencing outcomes, such as imposed penalties, fines, alternative sentencing programs, or imprisonment.

Option 2a: There is a practical reason to support a data collection model for ALL criminal municipal violations, not just camping. For example, campers are often charged with Trespassing. The city leadership may also wish to see how their criminal justice trident is handling harassment, minor assaults, disorderly conduct, shoplifting, etc.

Option 3: Rescind the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) entirely and live with the consequences. The city has seen the repercussions of this approach in the King's Crossing area of town in 2022 when we experienced large encampments rife with unsafe and unhealthy living conditions.

Option 4: Examine the viability of amendments to the Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a 'Services-First' enforcement model, requiring officers to provide resource information or transportation to support services prior to citation.

Writing Policies or Best Practices into law is fraught with challenges. Every encounter is a different story, fact pattern, and circumstance. Additionally, adding policy requirements into the law will make it unlike any other Loveland municipal law and remove a degree of officer discretion. Officer discretion is the authority of law enforcement to make independent, on-the-spot decisions—such as issuing a warning instead of a ticket, choosing not to arrest, or deciding when to use force—based on personal judgment, training, and situational context. This flexibility allows officers to tailor responses to specific circumstances rather than strictly adhering to, or over-enforcing, the letter of the law.

Option 4a: propose an alternative entity (outreach teams, volunteers,

etc.) who can engage, educate, and liaise between the homeless/transient community and the service/501(c)(3) providers, thus taking this off the shoulders of the legal trident.

Rule of 4 Options - Municipal Court Scorecard:

Option 1: Maintain Current Reporting Practices: The Municipal Court will respond to requests for data as they are received.

Option 2: Provide Limited Data Reporting: The Municipal Court will develop additional reports that will capture existing data elements stored in JWorks. This option will exclude information not efficiently aggregated such as (1) a defendant's self-reported housing status, if applicable, (2) non-financial sentencing conditions such as community service hours, jail sentence, educational courses, or other program conditions, and (3) whether the disposition of one case was part of a "global resolution" addressing a defendant charged with multiple cases. The frequency of reporting will be defined by City Council.

Option 3: Expand Data Collection and Reporting: The Municipal Court will modify court processes and/or modify JWorks to capture and aggregate additional data elements. This option will facilitate reports containing more granular data elements such as (1) a defendant's housing status, if applicable; (2) non-financial sentencing conditions such as community service hours, jail sentence, educational courses, or other sentencing conditions, and (3) whether the disposition of one case was part of a "global resolution" addressing a defendant charged with multiple cases. The frequency of reporting will be defined by City Council.

Council Follow-up: Staff will follow up with City Council based on the deliberation by Council during the Scorecard presentation.

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A
	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	N/A

STRATEGIC PLAN FOCUS AREA

Focus	Public Safety Innovation & Organizational Excellence
Strategy (if applicable)	Use Data-Driven Approaches as the Foundation Create a High-Performing Organizational Culture
Priority (if applicable)	Data-Driven Approaches Data-Based Decision-making and Prioritization
Notes	Additional Strategic Plan listed items on Scorecard attachment documents.

COUNCIL OR BOARD/COMMISSION REVIEW:
Type of Meeting: Regular City Council Meeting

Date of Meeting: February 3, 2026

Resulting Vote: Rule of Four request issued by City Council.

Discussion: Direction was given to the City Manager, Jim Thompson, to initiate research and ultimately prepare an item regarding amendments recommendations to Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a 'Services-First' enforcement model, requiring officers to provide resource information or transportation to support services prior to citation and the implementation of a data-collection framework to evaluate ordinance impacts and a formal report on diversionary programs that allow for fine reduction or forgiveness based on meaningful service engagement

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BACKGROUND:

History:
On February 3, 2026, the City Council, by Rule of Four request, directed City Manager Jim Thompson to initiate research and ultimately prepare an item regarding amendments recommendations to Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a 'Services-First' enforcement model, requiring officers to provide resource information or transportation to support services prior to citation and the implementation of a data-collection framework to evaluate ordinance impacts and a formal report on diversionary programs that allow for fine reduction or forgiveness based on meaningful service engagement."
.
Pursuant to the Rule of Four process, staff assembled a cross-departmental team and prepared a Scorecard outlining the legal context and background, operational considerations, estimated resource impacts, and options for Council deliberations.

Outreach and Notification Efforts: N/A

Conditions met/or anticipated: N/A

Start and End Dates (of studies, design, construction, or in service/operational): N/A

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Att 1 Rule of Four Scorecard (Police & CAO)
Att 2 Rule of Four Scorecard (Municipal Court)

Rule of 4 Scorecard

Date of Motion: February 3rd, 2026

Proposed Rule of 4 Description:
The purpose of this Rule of 4 Scorecard is to provide background information and outline the resources that would be required if Council chooses to move forward with the Rule of 4 request made by Councilor Light-Kovacs at the February 3, 2026 City Council Regular Meeting.

Councilor Light-Kovacs Motion:
"I move to direct the City Manager to return with amendments recommendations, by 4/30/2026 to Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a 'Services-First' enforcement model, requiring officers to provide resource information or transportation to support services prior to citation. This motion includes the implementation of a data-collection framework to evaluate ordinance impacts and a formal report on diversionary programs that allow for fine reduction or forgiveness based on meaningful service engagement."

Key Takeaways:

- Councilor Light-Kovacs: This motion is intentionally vague so that staff can assess what services and data they are able to include in the amendments; they are the ones doing the work, and I would appreciate their recommendations ahead of our policy adoption.
- Councilor Light-Kovacs: The nexus of this motion comes from a desire to find a good landing spot between enforcing our encampment ban and ensuring that people are still offered access to services (note that this is NOT asking officers to offer shelter or check on availability).
- Councilor Light-Kovacs: Key elements of data should include the services we could offer, data collection to help Council understand what is and what is not effective, know how individuals are moving through the court process and are there efficiencies to be gained.
- Councilor Samson: Interested in seeing the impact before and after the closure in March.
- Councilor Cortez: Would like the Judge to track citations - who was ticketed, how many, were they homeless, was a fine enforced, and was there jail time?
- Councilor Light-Kovacs: Wants assurance that some sort of alternative service was offered along with enforcement – what is the PD willing to "require" Officers to provide with discretion to homeless being served with enforcement action.
- Councilor Cortez: Wants more information from Judge Edgley regarding the outcomes of court cases and citations regarding homeless encampments.
- Councilor Rothberg: Wants to see more data to assist with decision regarding recommended changes from the Chief and Judge.
- Councilor Samson: Supports receiving more data but does not support amendments to the ordinance.
- Councilor Cortez: Recommended the Judge consider a monthly report over a period of 2+ years.
- Councilor Light-Kovacs: Would like to see a combination of data from the PD and the Judge.
- City Manager: Suggested he could direct staff (Judge and PD) to explore reporting matrixes from police, court and prosecution.

Timeline:

The notes below provide more detail and a few timestamps of the specific data and measurements being sought.

3:58:00 – Motion for adoption of Grants Pass (passed 5-4)

3:59:40 – Originally Councilor Light-Kovacs asked staff to come back with potential amendments to Grants Pass: *I move to direct the City Manager to return with amendments, by 4/30/2026 to Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a 'Services-First' enforcement model, requiring officers to provide resource information or transportation to support services prior to citation. This motion includes the implementation of a data-collection framework to evaluate ordinance impacts and a formal report on diversionary programs that allow for fine reduction or forgiveness based on meaningful service engagement*.

4:02:00 – Councilor Samson asked if it would be better to modify this request to ask staff to bring back the data first before trying to provide potential amendments. Light-Kovacs didn't want to amend her motion to this.

4:06:00 – Councilor Light Kovacs said that she made this vague, so Officer has discretion and flexibility to decide what level of service to offer. For example, an officer can give a citation and also give them a pamphlet with resources, or it could be that the officer sees that someone is experiencing a mental health crisis and so the officer is just going to take to behavioral health center, or person is just hungry, so officer gives a lift to Community Kitchen.

4:09:45 – Chief noted that officers already exercise discretion in providing varying levels of service. By putting these conditions into the law, it would limit their ability to adapt to each situation. Officers don't have capacity to be drivers. Light-Kovacs – Chief can make recommendations as to what make sense for officers to do. (Wants it in black or white).

4:13:00 – Councilor Cortez talked about the data that he'd like to see from the Judge and Light-Kovacs stated that we need to hear from both the PD and the Judge.

4:20:00 – Councilor Frahm discussed that this seems very vague and difficult to bring back recommendations. Also, it is hard to create recommendations without the data.

4:20:40 – CM Thompson said we can bring back recommendations (probably won't recommend transport), could come back with a recommendation to hand out pamphlets/resources.

4:25:00 – Councilor Cortez thinks city council is putting the cart before the horse. We need to enact Grants Pass and see what has worked/not worked before we make recommendations to amend the ordinance. Can't make recommendations before we have data, and we data from the Judge collected over the next 1-2 years.

4:27:30 – Councilor Light-Kovacs said that this is also about implementing a data collection framework. What data should we be collecting and what data should staff be presenting.

4:30:20 – CM Thompson offered that staff could look at different reporting matrixes and let council know what data we are already collecting.

4:31:00 – Light-Kovacs: changed the request to be a Rule of Four instead of amendment.

Summary Police Department and City Attorney Response:

The importance of this topic cannot be overstated. It intersects with **five** City of Loveland Strategic Plan Focus areas, **seven** Strategies, **nine** Priority areas, and many key initiatives. They are listed below.

After a municipal code (or law) is written, addressing criminal behavior belongs to three distinct entities: the police, the prosecutor, and the judge.



1. A Police Officer's primary role is to protect the lives, property, and rights of citizens, maintain public order, and enforce laws to prevent and detect crime. LPD compassionately enforces the laws as written according to the circumstances we encounter.

2. A Criminal Prosecutor acts on behalf of the government and the public to file charges against and prove in court that a defendant committed a crime, with the primary duty to seek justice rather than simply secure a conviction.

3. A Municipal Judge ensures that every case is adjudicated according to the rule of law and constitutional due process. The Judge applies the law as written to the facts presented, ensuring that penalties or dismissals remain consistent with the Municipal Code and judicial ethics.

The police department has it within their existing capability to track the citations/tickets/arrests associated with illegal camping or any illegal activity. This would include the identity of the individual, time/date, etc., however, it is important to note LPD does not track "housing status." It is not illegal to be homeless; therefore, we can only surmise housing status if the individual tells us they live at a shelter, have no fixed address, or declare to us they are "homeless." So, any reference to someone as being homeless or transient is not rooted in confirmed data. However, it is assuredly undercounted. Officers' interactions with those experiencing homelessness are typically generated by a call for service, i.e., someone calling 911 about a homelessness issue that is directly or indirectly affecting the caller. While we encourage our officers to be proactive in areas of deterring unsafe driving behavior and criminal activity, their efforts are typically not focused on someone who may be camping and not causing a disruption to the public.

The legal trident operates as a continuous feedback loop. Case outcomes—ranging from convictions to dismissals—are governed by constitutional protections, evidentiary standards, and ethical mandates. When cases are dismissed due to these external legal constraints, individuals often remain in the community without court-ordered intervention, leading to repeated interactions with law enforcement. Understanding these procedural drivers is essential for effective policy-making.

Recidivism patterns are influenced by a variety of systemic factors, including evidentiary availability, constitutional requirements, and prosecutorial discretion. Understanding the procedural trajectory of these cases allows the City to better allocate resources and address the complexities of repeat offenses.

Regarding the municipal codes prohibiting unauthorized camping (Chapters 7.39 and 9.47), the LPD reported exactly 200 camping tickets were issued in 2025.

- 132 were unique people
- 89 received only one ticket
- 28 received two tickets
- 15 people received three or more
- Of the 15 people who received three or more camping citations in 2025, six were in the top 10 arrestees list from below:

A breakdown at any juncture of the legal trident clearly impacts the community and the other two legs of the stool, and the system topples, thus creating **repeat offender** conditions. This is poignantly illustrated below.

2025 Top 10 Arrestee List	Total # of Arrests/Citations	Camping Citations
ARRESTEE #1	27	4
ARRESTEE #2	27	0
ARRESTEE #3	23	0
ARRESTEE #4	19	3
ARRESTEE #5	18	3
ARRESTEE #6	18	0
ARRESTEE #7	18	7
ARRESTEE #8	18	3
ARRESTEE #9	14	3
ARRESTEE #10	14	0

LPD Top 10 Call-for-Service Locations - 2025			
Location*	Location Name	No. of Calls	% of Total
137 S Lincoln Ave	Loveland Resource Center (Shelter)	471	0.93%
1325 N Denver Ave	Walmart	421	0.83%
915 E 10th St	St. Valentine Apartments	341	0.67%
2500 Rocky Mountain Ave	Medical Center of the Rockies	281	0.55%
860 N Cleveland Ave	Safeway (now closed)	244	0.48%
250 W 65th St	Walmart	199	0.39%
1669 Eagle Dr	Thompson Valley High School	171	0.34%
417 E Eisenhower Blvd	Gateway Motel	160	0.32%
255 E 2nd St	Patina Flats / Foundry Parking Garage**	154	0.30%
1655 E Eisenhower Blvd	Travelodge Hotel	152	0.30%
Total of Top 10		**2,594**	**5.12%**

- For ARRESTEE #1, if you remove the camping citations from the total number of arrests, 17 of the violations were Failure to Appear (FTA) warrants; the others were split between theft, obstruction, disorderly conduct, drug-related offenses, and trespassing. This is similar to the breakdown of the other nine arrestees.
- The Top 10 arrestees in 2025 comprised about 4.5% of all arrests made by LPD
- Three of them (red font) were also in the top 10 for 2024
- All of them indicated they are (or have been) homeless/transient
- The Top offenders were all adults
- At least 949 of the 4,316 total arrests made by LPD in 2025 involved known transient subjects
  - **These comprised 22% of total arrests made by LPD in 2025**
  - **Within those 949 transients, there were 403 unique arrestees** (distinct people)
  - 153 subjects had more than one arrest; 15 subjects had 10 or more arrests
  - 35% were in-custody arrests, which is typically reserved for more serious offenses, repeat offenders or other aggravating factors
- From the 50,697 citizen-generated calls for service (CFS) in 2025, at least 1,715 (or 3.4%) of them were known to be related to transient contacts.

The chart below summarizes the data as reported by the Municipal Court since the camping bans were passed in 2022.

Municipal Camping Citations				
	2022-2024		2025	
Dismissed	140	70%	65	71%
Guilty	59	30%	25	27%
Deferred Sentence	0	0%	1	1%
Adjudicated to date	**199**		**91**	
Pending Cases	48	19%	107	54%
Total citations issued	**247**		**198**	

Primary Drivers for Case Dismissals

Category	Legal & Practical Rationale
Evidentiary/Logistical	**Failure to Appear & Witness Availability:** If a defendant fails to appear for a prolonged period, evidence becomes stale. If the citing officer is no longer available to testify, the City cannot meet its burden of proof, necessitating dismissal in the interest of justice.
Case Management	**Global Plea Dispositions:** In instances where a defendant has multiple pending violations, a camping citation may be dismissed as part of a comprehensive plea deal that ensures a conviction or rehabilitation requirement on a more serious charge.
Ethical/Constitutional	**Mandatory Legal Elements (CRPC 3.8):** Per the Colorado Rules of Professional Conduct, a prosecutor cannot proceed without a reasonable belief that every element of a charge—such as the availability of shelter—can be proven beyond a reasonable doubt. If shelter verification is unavailable at the time of trial, dismissal is legally required.

Rule of 4 Options

Option 1: Keep the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) as written, placing no additional requirements on the city staff, City Attorney, Municipal Judge, or police department.

Option 2: Keep the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) as written. Create a data collection component and stipulate reporting mechanisms/timeframes. This would include the ***police*** pulling arrest and citation data, the ***city attorney*** matching every citation to a plea deal, dismissal, or trial recommendation, and the ***municipal judge*** detailing the sentencing outcomes, such as imposed penalties, fines, alternative sentencing programs, or imprisonment.

Option 2a: There is a practical reason to support a data collection model for ALL criminal municipal violations, not just camping. For example, campers are often charged with Trespassing. The city

leadership may also wish to see how their criminal justice trident is handling harassment, minor assaults, disorderly conduct, shoplifting, etc.

Option 3: Rescind the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) entirely and live with the consequences. The city has seen the repercussions of this approach in the King's Crossing area of town in 2022 when we experienced large encampments rife with unsafe and unhealthy living conditions.

Option 4: Examine the viability of amendments to the Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a 'Services-First' enforcement model, requiring officers to provide resource information or transportation to support services prior to citation.

Writing *Policies* or *Best Practices* into law is fraught with challenges. Every encounter is a different story, fact pattern, and circumstance. Additionally, adding policy requirements into the law will make it unlike any other Loveland municipal law and remove a degree of officer discretion. Officer discretion is the authority of law enforcement to make independent, on-the-spot decisions—such as issuing a warning instead of a ticket, choosing not to arrest, or deciding when to use force—based on personal judgment, training, and situational context. This flexibility allows officers to tailor responses to specific circumstances rather than strictly adhering to, or over-enforcing, the letter of the law.

Option 4a: propose an alternative entity (outreach teams, volunteers, etc.) who can engage, educate, and liaise between the homeless/transient community and the service/501(c)(3) providers, thus taking this off the shoulders of the legal trident.

Impact Analysis:	
Impact to other planned or ongoing efforts	***Other efforts:*** The City Risk Department has an on-going camp cleanup effort.
Project Budget Considerations	***Budget Considerations:*** • The creation of any dashboard, especially if it's public facing would have development costs. • Updating the data will require additional staff time.
Estimated Cost, Resource and Time Requirements to determine viability of each option	
Estimated Police Staff Time	*Option 1 - None* *Option 2 – Several weeks to develop framework* *Cost: Minimal* *Option 3 – None* *Cost: Likely significant increase in disruptive behavior in the camping areas of the city* *Option 4 – None beyond participating in working group* *Cost: Will negatively impact enforcement strategy and officer discretion*
Estimated CAO Staff Time	*Option 1 - None* *Option 2 – Several weeks to develop framework*

	Cost: Minimal *Option 3 - None* *Cost: Increased workload and liability* *Option 4 – Significant work needed to ascertain the exact ask, rewrite the law, define services, and remove all vagueness to the proposal* *Cost: Unknown*
Estimated Municipal Court Staff Time	*This will be addressed in a separate Municipal Judge Scorecard*.
Concurrence with Existing City Plans	
Strategic Plan	
Focus Area	**Public Safety**
Strategy	Strategy 2: Focus on Deterrence, Prevention and Recidivism
Priority	Priority E: Offenders participate in programs to reduce recidivism.
Focus Area	**Public Safety**
Strategy	Strategy 3: Use Data-Driven Approaches as the Foundation
Priority	Priority A: Loveland Police use data driven approaches to maximize the effect of available resources and increase the impact of our efforts.
Focus Area	**Economic Vitality**
Strategy	Strategy 2: Maximize existing Assets & Opportunities
Priority	Priority B: Downtown is revitalized to foster a vibrant commercial city-center.
Focus Area	**Fiscal Stability & Strength**
Strategy	Strategy 1: Address Imbalance Between Revenue and Expenses
Priority	Priority C: Unfunded liabilities are systematically identified and monitored.
Focus Area	**Livability**
Strategy	Strategy 1: Strive to Ensure Opportunity is Available to All
Priority	Priority B: The City continues to build robust and productive community collaborations to increase housing opportunities, invest in the creation of affordable and attainable housing and works to ensure our Municipal Code supports viable, creative options for shelter.
Priority	Priority C: The City is committed to prompting the next level of regional action so that people experiencing or at risk for homelessness have access to shelter and supportive services.
Focus Area	**Livability**
Strategy	Strategy 2: Enhance Community Image, Character and Sense of Place
Priority	Priority A: Regulations are in place to preserve the physical appeal and safety of the community by preventing undesirable activities and nuisance conditions while encouraging voluntary efforts to correct property issues.

Focus Area	**Innovation & Organizational Excellence**
Strategy	Strategy 1: Create a High-Performing Organizational Culture
Priority	Priority E: Data is accurately gathered and tracked to inform decisions, measure performance, determine priorities and allocate resources.
Focus Area	**Innovation & Organizational Excellence**
Strategy	Strategy 3: Support the Safety and Well-Being of Our Employees
Priority	Priority A: The City prioritizes a safe working environment and City employees have the training and physical work environment to feel safe performing their duties.

Rule of 4 Scorecard

Date of Motion: February 3rd, 2026

Proposed Rule of 4 Description:
The purpose of this Rule of 4 Scorecard is to provide background information and outline the resources that would be required if Council chooses to move forward with the Rule of 4 request made by Councilor Light-Kovacs at the February 3, 2026 City Council Regular Meeting.

Councilor Light-Kovacs Motion:
"I move to direct the City Manager to return with amendments recommendations, by 4/30/2026 to Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a 'Services-First' enforcement model, requiring officers to provide resource information or transportation to support services prior to citation. This motion includes the implementation of a data-collection framework to evaluate ordinance impacts and a formal report on diversionary programs that allow for fine reduction or forgiveness based on meaningful service engagement."

Key Takeaways:

- Councilor Light-Kovacs: This motion is intentionally vague so that staff can assess what services and data they are able to include in the amendments; they are the ones doing the work, and I would appreciate their recommendations ahead of our policy adoption.
- Councilor Light-Kovacs: The nexus of this motion comes from a desire to find a good landing spot between enforcing our encampment ban and ensuring that people are still offered access to services (note that this is NOT asking officers to offer shelter or check on availability).
- Councilor Light-Kovacs: Key elements of data should include the services we could offer, data collection to help Council understand what is and what is not effective, know how individuals are moving through the court process and are there efficiencies to be gained.
- Councilor Samson: Interested in seeing the impact before and after the closure in March.
- Councilor Cortez: Would like the Judge to track citations - who was ticketed, how many, were they homeless, was a fine enforced, and was there jail time?
- Councilor Light-Kovacs: Wants assurance that some sort of alternative service was offered along with enforcement – what is the PD willing to "require" Officers to provide with discretion to homeless being served with enforcement action.
- Councilor Cortez: Wants more information from Judge Edgley regarding the outcomes of court cases and citations regarding homeless encampments.
- Councilor Rothberg: Wants to see more data to assist with decision regarding recommended changes from the Chief and Judge.
- Councilor Samson: Supports receiving more data but does not support amendments to the ordinance.
- Councilor Cortez: Recommended the Judge consider a monthly report over a period of 2+ years.
- Councilor Light-Kovacs: Would like to see a combination of data from the PD and the Judge.
- City Manager: Suggested he could direct staff (Judge and PD) to explore reporting matrixes from police, court and prosecution.

Timeline:

The notes below provide more detail and a few timestamps of the specific data and measurements being sought.

3:58:00 – Motion for adoption of Grants Pass (passed 5-4)

3:59:40 – Originally Councilor Light-Kovacs asked staff to come back with potential amendments to Grants Pass: *I move to direct the City Manager to return with amendments, by 4/30/2026 to Loveland Municipal Code Chapter 9.47 and Chapter 7.39, establishing a 'Services-First' enforcement model, requiring officers to provide resource information or transportation to support services prior to citation. This motion includes the implementation of a data-collection framework to evaluate ordinance impacts and a formal report on diversionary programs that allow for fine reduction or forgiveness based on meaningful service engagement*.

4:02:00 – Councilor Samson asked if it would be better to modify this request to ask staff to bring back the data first before trying to provide potential amendments. Light-Kovacs didn't want to amend her motion to this.

4:06:00 – Councilor Light Kovacs said that she made this vague, so Officer has discretion and flexibility to decide what level of service to offer. For example, an officer can give a citation and also give them a pamphlet with resources, or it could be that the officer sees that someone is experiencing a mental health crisis and so the officer is just going to take to behavioral health center, or person is just hungry, so officer gives a lift to Community Kitchen.

4:09:45 – Chief noted that officers already exercise discretion in providing varying levels of service. By putting these conditions into the law, it would limit their ability to adapt to each situation. Officers don't have capacity to be drivers. Light-Kovacs – Chief can make recommendations as to what make sense for officers to do. (Wants it in black or white).

4:13:00 – Councilor Cortez talked about the data that he'd like to see from the Judge and Light-Kovacs stated that we need to hear from both the PD and the Judge.

4:20:00 – Councilor Frahm discussed that this seems very vague and difficult to bring back recommendations. Also, it is hard to create recommendations without the data.

4:20:40 – CM Thompson said we can bring back recommendations (probably won't recommend transport), could come back with a recommendation to hand out pamphlets/resources.

4:25:00 – Councilor Cortez thinks city council is putting the cart before the horse. We need to enact Grants Pass and see what has worked/not worked before we make recommendations to amend the ordinance. Can't make recommendations before we have data, and we data from the Judge collected over the next 1-2 years.

4:27:30 – Councilor Light-Kovacs said that this is also about implementing a data collection framework. What data should we be collecting and what data should staff be presenting.

4:30:20 – CM Thompson offered that staff could look at different reporting matrixes and let council know what data we are already collecting.

4:31:00 – Light-Kovacs: changed the request to be a Rule of Four instead of amendment.

Summary Police Department and City Attorney Response:

The importance of this topic cannot be overstated. It intersects with **five** City of Loveland Strategic Plan Focus areas, **seven** Strategies, **nine** Priority areas, and many key initiatives. They are listed below.

After a municipal code (or law) is written, addressing criminal behavior belongs to three distinct entities: the police, the prosecutor, and the judge.



1. A Police Officer's primary role is to protect the lives, property, and rights of citizens, maintain public order, and enforce laws to prevent and detect crime. LPD compassionately enforces the laws as written according to the circumstances we encounter.

2. A Criminal Prosecutor acts on behalf of the government and the public to file charges against and prove in court that a defendant committed a crime, with the primary duty to seek justice rather than simply secure a conviction.

3. A Municipal Judge ensures that every case is adjudicated according to the rule of law and constitutional due process. The Judge applies the law as written to the facts presented, ensuring that penalties or dismissals remain consistent with the Municipal Code and judicial ethics.

The police department has it within their existing capability to track the citations/tickets/arrests associated with illegal camping or any illegal activity. This would include the identity of the individual, time/date, etc., however, it is important to note LPD does not track "housing status." It is not illegal to be homeless; therefore, we can only surmise housing status if the individual tells us they live at a shelter, have no fixed address, or declare to us they are "homeless." So, any reference to someone as being homeless or transient is not rooted in confirmed data. However, it is assuredly undercounted. Officers' interactions with those experiencing homelessness are typically generated by a call for service, i.e., someone calling 911 about a homelessness issue that is directly or indirectly affecting the caller. While we encourage our officers to be proactive in areas of deterring unsafe driving behavior and criminal activity, their efforts are typically not focused on someone who may be camping and not causing a disruption to the public.

The legal trident operates as a continuous feedback loop. Case outcomes—ranging from convictions to dismissals—are governed by constitutional protections, evidentiary standards, and ethical mandates. When cases are dismissed due to these external legal constraints, individuals often remain in the community without court-ordered intervention, leading to repeated interactions with law enforcement. Understanding these procedural drivers is essential for effective policy-making.

Recidivism patterns are influenced by a variety of systemic factors, including evidentiary availability, constitutional requirements, and prosecutorial discretion. Understanding the procedural trajectory of these cases allows the City to better allocate resources and address the complexities of repeat offenses.

Regarding the municipal codes prohibiting unauthorized camping (Chapters 7.39 and 9.47), the LPD reported exactly 200 camping tickets were issued in 2025.

- 132 were unique people
- 89 received only one ticket
- 28 received two tickets
- 15 people received three or more
- Of the 15 people who received three or more camping citations in 2025, seven were in the top 10 arrestees list from below:

A breakdown at any juncture of the legal trident clearly impacts the community and the other two legs of the stool, and the system topples, thus creating **repeat offender** conditions. This is poignantly illustrated below.

2025 Top 10 Arrestee List	Total # of Arrests/Citations	Camping Citations
ARRESTEE #1	27	4
ARRESTEE #2	27	0
ARRESTEE #3	23	0
ARRESTEE #4	19	3
ARRESTEE #5	18	3
ARRESTEE #6	18	0
ARRESTEE #7	18	7
ARRESTEE #8	18	3
ARRESTEE #9	14	3
ARRESTEE #10	14	0

LPD Top 10 Call-for-Service Locations - 2025			
Location*	Location Name	No. of Calls	% of Total
137 S Lincoln Ave	Loveland Resource Center (Shelter)	471	0.93%
1325 N Denver Ave	Walmart	421	0.83%
915 E 10th St	St. Valentine Apartments	341	0.67%
2500 Rocky Mountain Ave	Medical Center of the Rockies	281	0.55%
860 N Cleveland Ave	Safeway (now closed)	244	0.48%
250 W 65th St	Walmart	199	0.39%
1669 Eagle Dr	Thompson Valley High School	171	0.34%
417 E Eisenhower Blvd	Gateway Motel	160	0.32%
255 E 2nd St	Patina Flats / Foundry Parking Garage**	154	0.30%
1655 E Eisenhower Blvd	Travelodge Hotel	152	0.30%
Total of Top 10		**2,594**	**5.12%**

- For ARRESTEE #1, if you remove the camping citations from the total number of arrests, 17 of the violations were Failure to Appear (FTA) warrants; the others were split between theft, obstruction, disorderly conduct, drug-related offenses, and trespassing. This is similar to the breakdown of the other nine arrestees.
- The Top 10 arrestees in 2025 comprised about 4.5% of all arrests made by LPD
- Three of them (red font) were also in the top 10 for 2024
- All of them indicated they are (or have been) homeless/transient
- The Top offenders were all adults
- At least 949 of the 4,316 total arrests made by LPD in 2025 involved known transient subjects
  - **These comprised 22% of total arrests made by LPD in 2025**
  - **Within those 949 transients, there were 403 unique arrestees** (distinct people)
  - 153 subjects had more than one arrest; 15 subjects had 10 or more arrests
  - 35% were in-custody arrests, which is typically reserved for more serious offenses, repeat offenders or other aggravating factors
- From the 50,697 citizen-generated calls for service (CFS) in 2025, at least 1,715 (or 3.4%) of them were known to be related to transient contacts.

The chart below summarizes the data as reported by the Municipal Court since the camping bans were passed in 2022.

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Primary Drivers for Case Dismissals

Category	Legal & Practical Rationale
Evidentiary/Logistical	**Failure to Appear & Witness Availability:** If a defendant fails to appear for a prolonged period, evidence becomes stale. If the citing officer is no longer available to testify, the City cannot meet its burden of proof, necessitating dismissal in the interest of justice.
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Rule of 4 Options

Option 1: Keep the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) as written, placing no additional requirements on the city staff, City Attorney, Municipal Judge, or police department.

Option 2: Keep the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) as written. Create a data collection component and stipulate reporting mechanisms/timeframes. This would include the ***police*** pulling arrest and citation data, the ***city attorney*** matching every citation to a plea deal, dismissal, or trial recommendation, and the ***municipal judge*** detailing the sentencing outcomes, such as imposed penalties, fines, alternative sentencing programs, or imprisonment.

Option 2a: There is a practical reason to support a data collection model for ALL criminal municipal violations, not just camping. For example, campers are often charged with Trespassing. The city

leadership may also wish to see how their criminal justice trident is handling harassment, minor assaults, disorderly conduct, shoplifting, etc.

Option 3: Rescind the municipal code regarding unauthorized camping (Chapters 7.39 and 9.47) entirely and live with the consequences. The city has seen the repercussions of this approach in the King's Crossing area of town in 2022 when we experienced large encampments rife with unsafe and unhealthy living conditions.

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Option 4a: propose an alternative entity (outreach teams, volunteers, etc.) who can engage, educate, and liaise between the homeless/transient community and the service/501(c)(3) providers, thus taking this off the shoulders of the legal trident.

Impact Analysis:	
Impact to other planned or ongoing efforts	***Other efforts:*** The City Risk Department has an on-going camp cleanup effort.
Project Budget Considerations	***Budget Considerations:*** • The creation of any dashboard, especially if it's public facing would have development costs. • Updating the data will require additional staff time.
Estimated Cost, Resource and Time Requirements to determine viability of each option	
Estimated Police Staff Time	*Option 1 - None* *Option 2 – Several weeks to develop framework* *Cost: Minimal* *Option 3 – None* *Cost: Likely significant increase in disruptive behavior in the camping areas of the city* *Option 4 – None beyond participating in working group* *Cost: Will negatively impact enforcement strategy and officer discretion*
Estimated CAO Staff Time	*Option 1 - None* *Option 2 – Several weeks to develop framework*

	Cost: Minimal *Option 3 - None* *Cost: Increased workload and liability* *Option 4 – Significant work needed to ascertain the exact ask, rewrite the law, define services, and remove all vagueness to the proposal* *Cost: Unknown*
Estimated Municipal Court Staff Time	*This will be addressed in a separate Municipal Judge Scorecard*.
Concurrence with Existing City Plans	
Strategic Plan	
Focus Area	**Public Safety**
Strategy	Strategy 2: Focus on Deterrence, Prevention and Recidivism
Priority	Priority E: Offenders participate in programs to reduce recidivism.
Focus Area	**Public Safety**
Strategy	Strategy 3: Use Data-Driven Approaches as the Foundation
Priority	Priority A: Loveland Police use data driven approaches to maximize the effect of available resources and increase the impact of our efforts.
Focus Area	**Economic Vitality**
Strategy	Strategy 2: Maximize existing Assets & Opportunities
Priority	Priority B: Downtown is revitalized to foster a vibrant commercial city-center.
Focus Area	**Fiscal Stability & Strength**
Strategy	Strategy 1: Address Imbalance Between Revenue and Expenses
Priority	Priority C: Unfunded liabilities are systematically identified and monitored.
Focus Area	**Livability**
Strategy	Strategy 1: Strive to Ensure Opportunity is Available to All
Priority	Priority B: The City continues to build robust and productive community collaborations to increase housing opportunities, invest in the creation of affordable and attainable housing and works to ensure our Municipal Code supports viable, creative options for shelter.
Priority	Priority C: The City is committed to prompting the next level of regional action so that people experiencing or at risk for homelessness have access to shelter and supportive services.
Focus Area	**Livability**
Strategy	Strategy 2: Enhance Community Image, Character and Sense of Place
Priority	Priority A: Regulations are in place to preserve the physical appeal and safety of the community by preventing undesirable activities and nuisance conditions while encouraging voluntary efforts to correct property issues.

Focus Area	**Innovation & Organizational Excellence**
Strategy	Strategy 1: Create a High-Performing Organizational Culture
Priority	Priority E: Data is accurately gathered and tracked to inform decisions, measure performance, determine priorities and allocate resources.
Focus Area	**Innovation & Organizational Excellence**
Strategy	Strategy 3: Support the Safety and Well-Being of Our Employees
Priority	Priority A: The City prioritizes a safe working environment and City employees have the training and physical work environment to feel safe performing their duties.

MEETING DATE:	March 24, 2026
TO:	City Council
DEPARTMENT:	Community Partnership Office
DIRECTOR:	Rod Wensing
PRESENTER:	Alison Hade
STRATEGIC PLAN FOCUS AREA:	Livability

AGENDA ITEM:
PRESENTATION REGARDING THE RULE OF FOUR SCORECARD REQUEST ON SANCTIONED CAMPING

RECOMMENDED CITY COUNCIL ACTION:
As this is an information only item, there is no recommended City Council action from staff

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	N/A
Deny the motion or take no action	N/A
Adopt a Modified Action	N/A
Refer back to Staff	N/A

SUMMARY:

Purpose: The purpose of this item is to bring forward the Rule of Four Scorecard presentation requested by Councilmember Swanty on February 4, 2026 **(Attachment 1)**. The scorecard outlines potential options related to sanctioned camping, including risks, costs, benefits, and operations.

Objective: The objective of this Scorecard presentation is to provide information based on the Rule of Four request to allow City Council to decide which option they would prefer given the scope of resources and cost and time estimations by staff.

Impact: The impact of the scorecard will depend on whether City Council would like to pursue any of the options, which will require additional staff time to determine viability.

Council Follow-up: Staff will provide additional information to City Council based on recommendations made during the Scorecard presentation.

The Scorecard offers three options: A) do nothing, B) use of a City park

or open lands area for camping, C) use of the South Railroad site for camping. Options B and C describe the benefits and limitations. Both options would require a Temporary Use Permit.

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A
	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	N/A

STRATEGIC PLAN FOCUS AREA

Focus	Livability
Strategy (if applicable)	Strive to Ensure Opportunity is Available to All
Priority (if applicable)	Reduce Homelessness
Notes	The City is committed to prompting the next level of regional action so that people experiencing or at risk for homelessness have access to shelter and supportive services.

COUNCIL OR BOARD/COMMISSION REVIEW:
Type of Meeting: Regular City Council Meeting

Date of Meeting: February 4, 2026

Resulting Vote: Rule of Four was issued.

Discussion: Direction from City Council was directed to City Manager, Jim Thompson (or staff), to evaluate the risks, costs, benefits and operations of a designated City park or open land area for camping or to be used as a SafeLots program.

BACKGROUND:

History:

On February 4, 2026, City Council, by a Rule of Four request, directed City Manager Jim Thompson or staff to evaluate the risks, costs, benefits and operations of a designated City park or open land area for camping or to be used as a SafeLots program.

The Scorecard offers three options: A) do nothing, B) use of a City park or open lands area for camping, C) use of the South Railroad site for camping. Options B and C describe the benefits and limitations. Both options would require a Temporary Use Permit.

Outreach and Notification Efforts: N/A

Conditions met/or anticipated: N/A

Start and End Dates (of studies, design, construction, or in service/operational): N/A

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Att 1 Rule of Four Scorecard: Camping

Rule of 4 Scorecard

Date of Motion: February 4, 2026

Proposed Rule of 4 Description:
The purpose of this Rule of 4 Scorecard is to provide preliminary information and outline the resources required to fully move forward with the Rule of 4 request by Councilor Swanty from February 4, 2026.

Email from Councilor Swanty
I am looking for a rule of four request to direct the City Manager and/or staff to provide the Council with an evaluation of the potential risks, costs, benefits, and how the day to day operations would work involved in designating and authorizing specific City park or open land areas for camping, or to be used as Safe Lots, consistent with LMC 9.47.020(B).

Staff Summary Response:

The following preliminary information addresses questions raised about potential locations for sanctioned camping to fill a gap once the Loveland Resource Center discontinues night shelter on the morning of March 16th.

Evaluation of Using a City Park or Open Land for Camping:

Option A: Do nothing
Council may choose to take no action to allow camping in a designated area.

Option B: Designate a City park or open lands area for camping
The City of Loveland's public parks and open spaces, and supporting facilities, are currently committed and fully programed in service to community recreation. With consideration of sites within public parks and open spaces, the designation of a parking area adjacent to a roadway would provide the space and visibility needed for the operation of community camping. However, community recreation and revenue generation will inherently be affected at any identified site. The parking areas serve as supporting facilities for the adjacent recreational assets, such as ball fields, pickleball and tennis courts, public restrooms, playgrounds, shelters, and trail access.

Potential Risks: Consideration would need to be given to the impacts on affected areas, including potential impacts to long-standing user groups and loss of associated revenue. Additional actions needed may include cancellation of field use for tournaments, private rentals, school-district programming, and recreational programming; cancellation of shelter rentals; cancellation of community special events; and impacted access to playgrounds, tennis and pickleball courts, splash pads, restrooms, nature-based recreation, and trails. Any park or open land space that is used for authorized camping will require fencing for the security of the items inside and to ensure that the site is only used for sleeping at night.

Option C: Reactivate the South Railroad site for camping and SafeLots

The South Railroad site is City-owned and has the added benefit of not being used for a specific purpose. It is also already fenced, which will allow access to tents overnight and the ability to lock the area during the day to keep personal belongings secure. The South Railroad site has space for parking that could be used for people currently sleeping in their vehicles. Note that the already existing Loveland SafeLot Parking is a program of the House of Neighborly Service that is available by application only and not on a drop-in basis.

Potential Risks: To reduce risk and control costs, the site should be limited to overnight sleeping only, potentially operating from 7 p.m. to 7 a.m. and include staff and security to maintain safety, enforce rules, and respond to emergencies.

Additional information for Options B and C:

- Only personal tents would be used at any site
- Any location used would require a temporary use permit
- Tent camping is not viable year-round. Any site chosen would be usable until about the end of October depending on weather.
- Options B and C must include a risk assessment for additional liabilities from the City Attorney's Office.

Costs/Daily Operations: Operating the site would require up to five temporary/non-benefitted employees. Two people would work three 12-hour overnight shifts. It may be possible to staff the site with a single overnight employee with additional help at the beginning and end of each shift, though recruitment for the short shifts may be difficult.

Benefit: The benefit of sanctioned camping includes the following:

- Reduces unsanctioned camping in public spaces. Establishing a designated camping area could prevent up to 40 individuals who currently shelter at the Loveland Resource Center from camping in City parks, open lands, and private property. This would ease the burden on Parks and Open Lands staff, reduce impacts on waterways and natural areas, and retain community access to public lands and facilities.
- Provides a safer nighttime option and may reduce crime. Offering a sanctioned place to camp gives people a predictable, legal location to go at night. This stability has the potential to reduce criminal activity associated with unsheltered homelessness.
- Supports sobriety and reduces late-night risks. The existing 10 p.m. curfew at the Loveland Resource Center ensures staff oversight for individuals working on sobriety or needing structure. Access to staff, basic supplies, and a safe indoor environment may help contribute to fewer arrests.
- Protects waterways and reduces environmental hazards. People experiencing homelessness often camp near water sources. A designated camping area may help protect waterways from biohazards, chemicals used for warmth, and fire risks associated with unsanctioned camps.
- Improves safety for women. A designated camping area with oversight can help protect women at night. Sexual and physical assault among homeless women is common. One study found that nearly 80% had experienced rape, physical assault, or stalking. A safer, monitored environment can reduce vulnerability.

Impact Analysis:	
Impact to other planned or ongoing efforts	***Other efforts:*** *As of March 16, 2026, there are not any plans to shelter the people who currently utilize the Loveland Resource Center for night shelter.*
Project Budget Considerations	*Option B would require closure or limited access to adjacent community recreational assets, resulting in potential negative impacts with long-standing user groups.* ***Budget Considerations:*** *Any use of city land for overnight camping should be supported by city staff and security. Other costs would include a small structure for staff as well as porto-lets and other items to ensure a safe and workable solution. An approximate cost for six months is $236,000.* *Option B would result in revenue loss due to closure of the adjacent recreational assets, such as ball fields, pickleball and tennis courts, and shelters. This revenue loss would impact the Parks and Recreation Department's total cost-recovery contributions to the General Fund.*
Estimated Cost, Resource and Time Requirements by Project Phase	
• Time: 65 to 70 hours	*Better research on each of the costs listed above, including discussion with Parks & Recreation, Facilities, Public Works, Development Services, Legal, Human Resources, and Loveland Police Department staff.*
•	
Concurrence with Existing City Plans	
Strategic Plan	
• Focus Area	***Livability***
• Strategy	*Strive to Ensure Opportunity Available to All*
• Priority	*Reduce Homelessness*

MEETING DATE:	March 24, 2026
TO:	City Council
DEPARTMENT:	City Manager's Office
DIRECTOR:	Jim Thompson
PRESENTER:	Kara Kish, Parks and Recreation Director and Vince Junglas, City Attorney
STRATEGIC PLAN FOCUS AREA:	Livability

AGENDA ITEM:
PRESENTATION REGARDING THE RULE OF FOUR SCORECARD REQUEST ON LAKE LOVELAND SWIM BEACH

RECOMMENDED CITY COUNCIL ACTION:
As this is an information only item, there is no recommended City Council action from staff

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	N/A
Deny the motion or take no action	N/A
Adopt a Modified Action	N/A
Refer back to Staff	N/A

SUMMARY:

Purpose: The purpose of this item is to bring forward the Rule of Four Scorecard presentation requested by Councilmember Cortez per the Rule of Four process from December 16, 2025. The Scorecard outlines background information, options for Council consideration, implementation requirements, and estimated staffing and budget and impacts to the City.

Objective: The objective of this Scorecard presentation is to provide information based on the Rule of Four Request and allow Council to deliberate and decide which option they would prefer to move forward on, given the scope of resources and estimations by staff.

Impact: The impact of this Scorecard presentation would depend on whether City Council wishes to move forward with pursuing the reopening of the Lake Loveland Swim Beach, which would require additional City staff and budget resources, or to continue serving the community through the operation of the City's four water-based recreation areas.

Council Follow-up: Staff will follow up with City Council based on the deliberation by Council during the Scorecard presentation.

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A
	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	N/A

STRATEGIC PLAN FOCUS AREA

Focus	Livability
Strategy (if applicable)	Enhance Community Image, Character and Sense of Place
Priority (if applicable)	Provide Cultural, Educational and Recreational Opportunities for All
Notes	

COUNCIL OR BOARD/COMMISSION REVIEW:
Type of Meeting: N/A

Resulting Vote: N/A

Discussion: N/A

BACKGROUND:

History:
On December 16, 2025, the City Council, by Rule of Four request, directed City Manager Jim Thompson to initiate research and ultimately prepare an item regarding operations of the Lake Loveland Swim Beach (**Attachment 1**).

Pursuant to the Rule of Four process, staff assembled a cross-departmental team and prepared a Scorecard outlining the legal context and background, operational considerations, estimated resource impacts, and options for Council deliberations (**Attachment 2**).

Implementing service level changes in 2025 required the City to take a hard look at all city services, programs, staffing, events and operations to identify areas where adjustments could be made while striving to minimize impacts on essential services to the community. After review of staffing capacity and continued water-based recreation available to the Loveland community, the operational costs were removed from the Parks and Recreation Department budget. In the 2026 approved budget, the Parks and Recreation Department prioritized year-round staffing stability in the Parks Division to maintain current service levels and reopen the park restrooms seasonally. The overall service level changes still include broad impacts to many community assets and programs. A memorandum was provided to the City Council on May 28, 2025 regarding the state of the Lake Loveland Swim Beach **(Attachment 3)**.

In 2023, the City of Loveland entered into an agreement with the Lake Loveland Recreation Club, Inc. (“Club”) for the use of Lake Loveland for a swimming and wading area. The agreement identified an annual payment for 2023-2027 due in advance of the first day of operation. After the announcement of the beach closure, the Club connected with the Parks and Recreation Department to offer waiver of the annual lease payment. The reduction would have only had a minimal impact on the required resources to operate the beach. The City exercised its right to terminate the agreement prior to the 2025 season. **(Attachment 4)**

Outreach and Notification Efforts: N/A

Conditions met/or anticipated: N/A

Start and End Dates (of studies, design, construction, or in service/operational): N/A

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Att 1 Rule of Four Request
Att 2 Rule of Four Scorecard on the Lake Loveland Swim Beach
Att 3 Memo from the City Mangager - May 2025
Att 4 Lease Agreement with the Lake Loveland Recreation Club - 2023

From: Zeke Cortez
Sent: Tuesday, December 16, 2025 9:51 AM
To: Jim Thompson <Jim.Thompson@cityofloveland.org>
Cc: City Council <CCouncil@cityofloveland.org>; Vince Junglas <Vince.Junglas@cityofloveland.org>; Temp CCMAIL <TEMPCC@cityofloveland.org>
Subject: Rule of Four - Loveland Swim Beach

Good Morning Mayor McFall and Council,

Mayor McFall and Council, I would like to re-initiate a Rule of Four request to direct the City Manager to prepare an item for a future agenda regarding the re-opening of the Lake Loveland swim beach despite the risks associated with operating the swim beach as articulated by our City Attorney. Specifically, I am requesting the support of three other Councilors to direct the City Manager to bring forward the following for Council consideration. Specifically, I'm asking for the city to negotiate with the Lake Loveland Recreation Club ("Club") for a new lease to be implemented in time for the Summer of 2026.

As part of this negotiation, the Rule of Four request further directs the City Manager to explore mechanisms such that the City has a neutral cost associated for the operation of the swim beach. As an FYI, I am copying Olivia Lundeen in this email as she has expressed interest in this topic. Thank you for your support.

Kindly,
Zeke

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'Emails to or from City Council are subject to public disclosure under the Colorado Open Records Act (CORA), with limited exceptions. All emails addressed to or sent from City Council, including email addresses, will be visible in an online system in order to promote transparency, except those considered confidential under CORA. Emails with "#private#" in the subject line will appear in the online system, but the content and subject line will be restricted from view. However, the City of Loveland cannot guarantee that an email marked "#private#" will remain private under CORA

Rule of 4 Scorecard

Date of Motion: December 16, 2025

Proposed Rule of 4 Description: The purpose of this Rule of Four Scorecard is to provide preliminary information and outline resources required to move forward with the Rule of Four request by Councilor Cortez from December 16, 2025. The email request is below:

Rule of 4 Email Request from Councilor Cortez from December 16, 2025:

Good Morning Mayor McFall and Council,

Mayor McFall and Council, I would like to re-initiate a Rule of Four request to direct the City Manager to prepare an item for a future agenda regarding the re-opening of the Lake Loveland swim beach despite the risks associated with operating the swim beach as articulated by our City Attorney. Specifically, I am requesting the support of three other Councilors to direct the City Manager to bring forward the following for Council consideration. Specifically, I'm asking for the city to negotiate with the Lake Loveland Recreation Club ("Club") for a new lease to be implemented in time for the Summer of 2026.

As part of this negotiation, the Rule of Four request further directs the City Manager to explore mechanisms such that the City has a neutral cost associated for the operation of the swim beach. As an FYI, I am copying Olivia Lundeen in this email as she has expressed interest in this topic. Thank you for your support.

Kindly,
Zeke

Summary Response:

Background:

Parks and Recreation Department Reduced-Services Budget Prioritization

Implementing service level changes in 2025 required the City to take a hard look at all city services, programs, staffing, events and operations to identify areas where adjustments could be made while striving to minimize impacts on essential services to the community. After review of staffing capacity and continued water-based recreation available to the Loveland community, the operational costs were removed from the Parks and Recreation Department budget. In the 2026 approved budget, the Parks and Recreation Department prioritized year-round staffing stability in the Parks Division to maintain current service levels and reopen the park restrooms seasonally. The overall service level changes still include broad impacts to many community assets and programs. A memorandum was provided to the City Council on May 28, 2025 regarding the state of the Lake Loveland Swim Beach **(Attachment 3)**.

Lease Agreement with the Lake Loveland Recreation Club

In 2023, the City of Loveland entered into an agreement with the Lake Loveland Recreation Club, Inc. ("Club") for the use of Lake Loveland for a swimming and wading area. The agreement identified an annual payment for 2023-2027 due in advance of the first day of operation. After the announcement of the beach closure, the Club connected with the Parks and Recreation Department to offer waiver of the annual lease payment. The reduction would have only had a minimal impact on the required resources to operate the beach. The City exercised its right to terminate the agreement prior to the 2025 season. **(Attachment 4)**

Reopening the Lake Loveland Swim Beach Despite the Risks Associated

Reopening the swim beach, without waterfront certified lifeguards, significantly increases the City's exposure to negligence claims and litigation. Under the Colorado Governmental Immunity Act, the City's immunity is waived for the operation of swimming facilities and the creation of dangerous conditions in public parks. While Larimer County and the State of Colorado operate unguarded beaches, they have larger resource basis to absorb potential losses. Furthermore, recent legislation, SB24-058, does not modify this immunity scheme or eliminate the City's liability for "dangerous conditions" on public property.

Efforts to mitigate this liability, such as the placement of rock boundaries to reestablish the shoreline, were designed to clearly signal that the beach is closed and that the City is not an active operator. Without a formal lease and operational control, the responsibility for preventing trespassing on the private lake surface rests with the Club. Reverting to City operation—even with a low-cost lease—would shift this burden and the risk of being targeted in accidental death lawsuits back to the City.

Reinstating Waterfront Lifeguard Operations

To establish a waterfront certified lifeguard staff for 2026 operations, the City would need to recruit lifeguards and conduct waterfront lifeguard training. Waterfront lifeguards must have a current lifeguard certification prior to waterfront training. Training would cost each individual $175 for their lifeguard certification and an additional $75 for their waterfront certification.

Mechanism for a Cost-Neutral Operation of the Lake Loveland Swim Beach

Based on the City's experience operating the Lake Loveland Swim Beach, anticipated annual expenses for operating a guarded beach would require an ongoing appropriation of approximately $50,000. A cost-neutral operation would require collecting admission fees. Annually, the beach recorded approximately 4,000-6,000 visitors. Conservatively, a fee of $12.50 would need to be collected to cover operational expenses ($8.33 if based on 6,000). For comparison, the Winona Outdoor Pool has approximately 20,000 visitors annually, not including pool party rentals or swim lessons. Pool admissions are $7.00 for adults, $6.00 for youth. A cost-neutral operation would place the Lake Loveland Swim Beach as the city's most expensive water-based recreational asset.

Up to an additional $25,000 one-time appropriation for initial site set-up for an admissions-based facility. These funds would be utilized to create physical barriers around the beach to restrict admission, reinstating the restroom facility or securing portable restrooms, and a secure mechanism for collecting fees (credit and/or cash).

Reopening Timeline

The swim beach seasonally operates mid-June through Labor Day (if possible). Factors which influence opening and closing dates include the availability of appropriated funds, availability of waterfront certified lifeguards (available personnel also decreases as students go back to school), lake water levels, inclement weather, and high E.coli levels. It is undetermined if the swim beach would be able to reopen in 2026.

City of Loveland Water-Based Recreation Opportunities

The City operates accessible and high-quality areas for water-based recreation, including free access sites and a financial assistance program for entry to pools. Water-based recreation is provided at four facilities, which include an indoor and outdoor swimming pool and two splash pads. The commitment to ensuring free and low-cost aquatic areas is a part of the essential functions of the Parks and Recreation Department. To reduce the cost of admission to the Chilson Recreation Center and Winona Outdoor Pool for residents who qualify for low-income assistance, the Parks and Recreation Department maintains a Financial Assistance Program.

Options for Council to Consider:

Option A - No action at this time

Continue to support the operation of accessible and free and low-cost water-based recreation at the city's four other aquatic facilities.

Option B - Direct staff to pursue an updated lease with the Lake Loveland Recreation Club and prepare an additional appropriation request for Council to pursue reopening a city-operated swim beach *with* lifeguards

Operating the beach with waterfront certified lifeguards provides the highest level of risk mitigation but risks still remain. Governmental immunity is still waived under C.R.S. § 24-10-106(1)(f), but any claim would be faced with facts putting the City in the best possible position to protect human life.

An ongoing appropriation of $50,000 from the General Fund would be necessary and up to an additional $25,000 one-time appropriation for initial site set-up for an admissions-based facility. The Parks and Recreation Department would need to mobilize current staff to recruit lifeguards, host a waterfront certification course, manage waterfront lifeguards, and maintain the swim beach and restrooms. The Recreation Manager, the Program Supervisor, and the Recreation Specialist have limited capacity to manage reinstating service levels. Their work duties would need to shift, impacting their capacity related to other management and operational responsibilities. The Parks Division would have increased responsibilities related to the beach and restroom maintenance. A cost-neutral operation would require the generation of $50,000 through admission fees; one-time sponsorships or donations would not support ongoing operations. Collection of fees would require securing access to the beach, and a mechanism for credit card/cash handling. Cost-Recovery success would be dependent on attendance.

Options C & D - May not require future Council involvement

Option C - Direct staff to pursue an updated lease with the Lake Loveland Recreation Club to pursue a city-operated swim beach *without* lifeguards

The City would still be subject to negligence claims, but the legal defenses available would be significantly diminished because the City would be knowingly providing an unsupervised swimming area. The plausibility of a "dangerous condition" basis of waiver would significantly increase.

City staff (Parks Division) would have increased responsibilities related to the beach and restroom maintenance. Their work duties would need to shift, impacting their capacity related to other management and operational responsibilities.

Option D - Direct staff to negotiate a contract with the Lake Loveland Recreation Club for the Club's Operation of the swim beach

Shifting the "apparent operator" status to the Club reduces the likelihood that the City will be targeted as the primary defendant in accidental death lawsuits. Under SB24-058, the Club, as some associated with the Club have asserted, could, theoretically, immunize itself from certain risks through specific signage, but by operating the beach, they—rather than the City—take on that risk assessment and burden.

Any effort on the part of the Club to operate the swim beach requires a negotiated contract due to the necessary use of City property for beach access. The Club would need to work with the City to negotiate an agreement that accounts for beach and restroom maintenance, security, and risk shifting to the Club.

Impact Analysis:	
Project Budget Considerations	• CAO: Option A, B, and C - Approximately 10 hours of staff time to create and implement versions of the current status quo or the immediately prior status quo. Option D - Approximately 20-40 hours of staff time to negotiate an agreement shifting liability and maintenance requirements to LLRC. • P&R: Staff capacity to manage swim beach operations, staff capacity to recruit and train a sufficient number of waterfront certified lifeguards, staff capacity to complete maintenance tasks, availability of appropriated budget funding, and the ability to collect sufficient admission fees for a cost-neutral operation.
Estimated Cost, Resource and Time Requirements by Project Phase:	
Estimated Costs	The fiscal impacts would include the transition of current staff capacity to support the administration of leases and contracts and management and operations of the swim beach. Ongoing appropriated budget funding is expected to be approximately $50,000 to support operations and up to an additional $25,000 one-time appropriation for initial site set-up for an admissions-based facility. Cost-Recovery would be dependent on attendance.

Estimated Staff Time	Creation and implementation of versions of the current status quo or the immediately prior status quo would require approximately 10 hours of CAO staff time. Negotiation of an agreement to shift liability and maintenance requirements to LLRC would require approximately 20-40 hours of CAO staff time. Reopening the swim beach under city operations would annually require current P&R staff to provide management and maintenance at approximately 1,000 total hours and approximately 1,900 total hours for lifeguard staff and admissions.
Strategic Plan Alignment:	
Focus Area	Livability
Strategy	Enhance Community Image Character and Sense of Place
Priority	Provide Cultural, Educational and Recreational Opportunities for All

City of Loveland

MEMORANDUM

TO: City Council

FROM: City Manager's Office

CC: City Attorney's Office

DATE: May 28, 2025

RE: State of Lake Loveland and the Swim Beach

Executive Summary

This memo addresses concerns surrounding Lake Loveland, a reservoir with water owned by the Greeley Loveland Irrigation Company (GLIC) and the North Lake Park swim beach, including the decision to close the swim beach. The 2025 budget focuses on providing essential services, maintaining public safety, meeting legal and regulatory obligations, and fulfilling contractual requirements. We assessed risks and considered impacts across the organization and over the long term. Other key factors included the seasonality or scalability of services and cost recovery.

While we recognize that the swim beach has been a meaningful part of the community and understand that its closure is disappointing, we want to be transparent about the difficult decision to close the beach.

Although we acknowledge and appreciate the Lake Loveland Recreation Club's (Club) offer to provide the lease at no cost, we do not have the funds or capacity to manage and operate the swim beach. However, the City of Loveland supports any decision by the Club to manage the beach if they are willing to engage in a lease arrangement with the City that allows the Club to take on the risks associated with managing the swim beach.

The City of Loveland continues to maintain access to water-based recreation at four facilities, which include an indoor and outdoor swimming pool and two splash pads. The commitment to ensuring free and low-cost aquatic areas is a part of the essential functions of the City of Loveland Parks and Recreation Department.

What is the History of Lake Loveland?

Lake Construction & Purpose: Lake Loveland was built in the early 1890s by English investors to store irrigation water diverted from the Big Thompson River. It was completed and first filled in 1895 and is used as an irrigation reservoir.

Ownership: Ownership is tied to water shares, primarily among two parties, the GLIC and the Lake Loveland Recreation Club (Club). Those with shares in GLIC own rights to

City of Loveland

the water. The City of Greeley began purchasing shares in 1961 and now owns a significant portion. Water rights are managed by the GLIC, while the Club holds the Lake Loveland surface recreational use rights on the water. In 1983, an agreement between the GLIC and the Club had recognized that Lake Loveland is an irrigation reservoir and that water levels may fluctuate. That agreement further acknowledges that recreation rights are subordinate to irrigation rights.

The City of Loveland does not have any authority or ownership of the water or operational decision-making related to the lake and water levels.

What is the City of Loveland's role in Lake Loveland?

The Club holds the Lake Loveland surface recreational use rights and, in the past, leased its recreation rights to the City. Shareholders with rights to water in Lake Loveland (often paired or associated with shares in the GLIC) include the City of Greeley and, to a lesser extent, the City of Evans. **The City of Loveland (City) owns less than 1% of the shares associated with the water.** The property where the former beach is located, North Lake Park, is owned by the City. Prior to the 1983 agreement, recreational rights were offered to the City. However, the City deferred purchasing the recreational rights and instead the Club bought the recreation rights for $600,000. After the conclusion of the 1983 agreement, the public no longer had access to the entire lake surface.

What are the budget and capacity constraints?

Operation of the beach was an ongoing annual expense that included the cost of lifeguards, operational staff, beach maintenance, trash removal, and more. With the City's need to balance limited funds across essential services like police, fire, roads, and parks, we had to make tough choices. The swim beach was one of several areas affected by necessary budget cuts.

What are the safety and liability concerns? Do they have merit?

All natural bodies of water come with inherent safety risks, and it is not uncommon for water rescues to be reported year-round on various lakes and waterways. It has been suggested that the City could operate the swim beach without lifeguards. Consistent with Colorado law, owning and operating a swim beach without a lifeguard creates a dangerous condition, which substantially increases City liability. Other communities, such as Fort Collins or Larimer County, have conducted similar risk assessments and, with greater financial and operational resources, have chosen to keep their swim beaches open based on their assessment. Unfortunately, the City of Loveland does not have the resources necessary to manage that level of risk safely. Other locations in Loveland, like the Chilson Recreation Center and Winona Outdoor Pool, always have trained lifeguards on duty for this very reason.

City of Loveland

Could the 2024 state law Landowner Liability Recreational Use Warning Signs (SB24-058) be used to reopen the swim beach without lifeguards?

SB24-058 amends the Colorado Recreational Use Statute to encourage landowners to open their lands for recreational use by limiting liability only under certain conditions. It has been suggested that the City of Loveland could operate the swim beach without lifeguards. Consistent with Colorado law, owning and operating a swim beach without a lifeguard creates a dangerous condition, which substantially increases City liability. Without lifeguards present, the City is open to liability claims that may further damage the financial and legal reputation of the City.

The legislation does not alter or change the Colorado Government Immunity Act (CGIA), which creates a waiver for the operation and maintenance of swimming facilities. The new law, however, would allow the owner of the surface rights—the Lake Loveland Recreation Club—to take a leadership role, working with the City as a necessary property owner, to assume the risk, provide resources and manage the operational needs to allow residents to use the beach's facilities at their own expense.

What can we expect during the off-season, especially regarding water levels and dust?

Since its construction in the 1890s, Lake Loveland--which is managed by GLIC--is drained in late summer and refilled each spring either for routine repairs and maintenance or to provide sufficient water for irrigation purposes.

This year, the lake has been slowly filling and is expected to improve over the next two to four weeks as snowmelt runoff increases. However, GLIC has informed its shareholders that, due to statewide water prioritization measures, they will only receive 50% of their usual water deliveries. As a result, Lake Loveland is not expected to fill completely this summer and will likely remain at lower levels similar to 2024.

When water levels drop during the fall and winter, the exposed lakebed can become dry and dusty. Winds—particularly from the west and northwest—can pick up dust and fine sand, which may affect local air quality. These conditions often raise concerns about health, fugitive dust exposure, and the overall aesthetics of the lake area. Questions surrounding the potential effects of fugitive dust and air quality should reach out to the Larimer County Department of Health & Environment or the Colorado Department of Public Health & Environment who are equipped to answer questions related to fugitive dust emissions.

What water quality concerns have existed in the past?

While the water quality is generally good for swimming in Lake Loveland, like many other Front-Range reservoirs, situations can arise that require the lake to be closed due

City of Loveland

to contamination such as E.coli or blue-green algae. Two such scenarios required the City to close the swim beach in July 2015 and in June 2019. City officials routinely tested the water throughout the summer. When results exceeded the state maximum contaminant level of E.coli, the beach would close until the water returned to safe levels. GLIC does not drain the water due to contaminants, but prior to the closure, the City would close access in the event of an E.coli and/or blue-green algae bloom.

Is the swim beach closure considered permanent or could there be a reconsideration based on collaboration with the lake property owners?

The closure of the Lake Loveland Swim Beach is one of several permanent service reductions implemented to stabilize the City of Loveland's budget. These reductions are part of a new base level of service established through the adopted 2025 budget. This approach prioritizes essential services, public safety, and legal obligations to stabilize the City's general fund.

New revenue, if available, will follow the same funding approach—focusing on strategic needs and using one-time funds for one-time costs like capital investments that keep our community safe and moving.

To learn more about citywide service changes, visit lovgov.org/2025servicechanges. For details about the swim beach, visit lovgov.org/services/parks-recreation/aquatics/swim-beach.

Access to Water-based Recreation in Loveland & Nearby

We are committed to maintaining the following aquatic areas during the summertime: The splash pads at Fairgrounds Park and Loveland Sports Park and the pools at the Chilson Recreation Center and Winona Outdoor Pool. Splash pads offer free outdoor water recreation and are typically a safer, cleaner, and more convenient alternative for all families.

The City of Loveland Parks and Recreation Department also maintains a Financial Assistance Program that helps reduce the cost of admission to the Chilson Recreation Center and Winona Outdoor Pool for residents who qualify for low-income assistance.

The Loveland Public Library offers four individual State and Larimer County Park pass kits for check-out. These kits check out for five days. They allow one vehicle to enter the park for free each day. For availability and holds for easy pickup, please look at the library's catalog.

There are also neighboring swim beaches such as Carter Lake, Horsetooth Reservoir, and Boyd Lake State Park.

City of Loveland

We understand this is disappointing news, and we want to thank you for your understanding as we continue to make decisions that protect the safety and financial stability of our city.

If you have further questions or would like more details, please don't hesitate to reach out to our Parks and Recreation Department at parks@cityofloveland.org.

City Manager's Office
500 East Third Street, Suite 330
Loveland, CO 80537
970.962.2303 | TDD: 970.962.2620

LovGov.org

AGREEMENT FOR USE OF LAKE LOVELAND

THIS AGREEMENT is entered into this **11th** day of **April**, 2023, by and between the Lake Loveland Recreation Club, Inc., a Colorado non-profit corporation (the "Club"), and the City of Loveland, Colorado, a municipal corporation (the "City").

WHEREAS, the Club is the owner of certain recreation rights on Lake Loveland (the "Lake"), located in Sections 10, 11, and 14, Township 5 North, Range 69 West of the 6th PM, City of Loveland, County of Larimer, Colorado, which Lake is owned and operated by the Greeley and Loveland Irrigation Company ("GLIC") as an irrigation reservoir; and

WHEREAS, the City wishes to lease from the Club a wading and play area on the Lake adjacent to City-owned property for the benefit of the public; and

WHEREAS, the parties wish to set forth their rights and responsibilities with respect to the City's lease of such portion of the Lake.

NOW THEREFORE, for and in consideration of the mutual promises and covenants set forth herein, the parties hereby agree as follows:

1. Leased Area. The Club hereby leases to the City that area on the Lake depicted on "Exhibit A," attached hereto and incorporated herein. Such area shall be referred to as the "Swimming/Wading Area."

2. Term. The term of this Agreement shall be from the date set forth above to December 31, 2023. The City shall be permitted to use the Lake as described herein from the Saturday before Memorial Day through Labor Day each year beginning in 2023. This Agreement shall automatically renew for four (4) additional one-year periods, unless earlier terminated pursuant to the terms of this Agreement.

3. Payment. The City agrees to pay the Club for year 2023 the amount of $2163. The City shall make such payment to the Club in advance of the City's first operation of the Swimming/Wading Area for the year. Annual payment, pursuant to the pay rate outlined in Exhibit B, will be due to the Club in advance of the first day of operation each year.

4. City's Use of the Swimming/Wading Area. The City may operate the Swimming/Wading Area for free public access between the approximate hours of 10:30 AM and 5:30 PM each day, depending upon weather, water levels, and swimmer attendance. The City has the right to schedule classes and other programs with instructors hired by the City at times outside of these hours.

5. Obligations of the Parties. The parties shall have the obligations with respect to the operation of the Swimming/Wading Area as described in detail below:

a. City's Obligations.

i. Rules and Regulations.

1. The City agrees to adopt rules and regulations governing the use of the Swimming/Wading Area as deemed appropriate in its discretion. The City shall post signs with such rules and regulations adjacent to the Swimming/Wading Area.

2. The City agrees to prohibit, and to use reasonable means to enforce the prohibition of, entry by the public in the areas of the Lake immediately adjacent to the Swimming/Wading Area. The City shall post "No Swimming" signs along the south facing shore and along other areas of North Lake Park where illegal swimming or access could occur.

ii. The City agrees to mark by appropriate buoys the specific location and perimeter of the Swimming/Wading Area, which is depicted on "Exhibit A." The City may periodically relocate the area due to fluctuations in the Lake water level.

iii. The City agrees to keep the Swimming/Wading Area clean and free of rubbish and debris.

iv. The City agrees to discontinue the use of the Swimming/Wading Area in the event that the City becomes aware that the quality of the water in the Lake violates any applicable water quality standards as defined by GLIC and/or the City of Loveland or applicable State agency, until such time as the water quality of the Lake is no longer deemed in violation of such standards. The City shall give the Club notice of such a negative water reading within twenty four (24) hours of such reading.

b. The Club's Obligations.

i. The Club agrees to meet with City staff as requested to assist in locating the buoys and ropes for the Swimming/Wading Area.

ii. The Club will implement safety regulations concerning the operation of boats adjacent to the Swimming/Wading Area.

c. Enforcement and Security.

i. The City shall provide lifeguards to guard within the Swimming/Wading Area between the public hours of 10:30AM to 5:30 PM, as may be adjusted from time to time by the City based on weather or other conditions.

ii. The City may assign a lifeguard to guard outside of the perimeter of the Swimming/Wading area utilizing a paddle board. Such lifeguard shall warn

swimmers in the Swimming/Wading Area to stay within the boundaries of the Swimming/Wading Area.

iii. The Club shall provide a security guard to enforce the "No Swimming" and "No Trespassing" regulations outside the boundaries of the Swimming/Wading Area, and, prior to the beginning of each week, shall provide the City with the name and contact of the security guard on duty for each day of the week. The City's lifeguards will report any violations of these regulations of which they become aware first to the Club's point of contact and then to the Club's security guard. If a trespassing violation is not resolved with a warning, either party may report such violation to the Loveland Police Department which may, in its discretion, issue citations to the trespassing individual(s).

iv. The parties agree to meet prior to the start of the City's operation of the Swimming/Wading Area to discuss enforcement of the rules and regulations both inside and outside the boundaries of the Swimming/Wading Area.

6. Insurance. The City represents that is has in force liability coverage at least equal to the liability limits under the Colorado Governmental Immunity Act. The City shall provide a certificate of insurance to the Club upon request. The City shall list the Club as an additional insured and the City shall retain a certificate of insurance that reflects the Club listed as an additional insured and the City's coverage.

7. Notices. Written notices shall be directed as follows and shall be deemed received when hand-delivered, emailed, or delivered by overnight mail, or three (3) days after being sent by certified mail, return receipt requested:

To the City:
Ashlee Taylor
City of Loveland
500 E Third St Suite 200
Loveland, CO 80537
Email:
ashlee.taylor@cityofloveland.org

To the Club:
Lake Loveland Recreation Club Inc
Attn: President
2640 Logan Dr
Loveland, CO 80538
Email: Pres@Lakeloveland.org

8. Termination.

a. For Convenience. The City may terminate this Agreement for convenience upon thirty (30) days prior written notice to the Club. If the City terminates this Agreement no less than thirty (30) days prior to the first operation of the Swimming/Wading Area for the year, the City shall not be obligated to pay the Club the annual payment, or if it has already made the annual payment to the Club, the Club shall return such payment to the City. The Club may terminate this

Agreement for convenience upon written notice to the City no less than ninety (90) days prior to the start of operations of the Swimming/Wading Area for the year.

b. For Default. In the event either party fails to perform according to the terms of this Agreement, such party may be declared in default. If the defaulting party does not cure said breach within ten (10) days of written notice thereof, the non-defaulting party may terminate this Agreement immediately upon written notice of termination to the other.

9. Miscellaneous.

a. It is mutually understood and agreed that the Club and GLIC have entered into separate agreements regarding uses and rights with respect to Lake Loveland. Nothing in this Agreement modifies, releases, or in any way alters or affects such agreements.

b. No term or condition of this Agreement shall be construed or interpreted as a waiver, express or implied, of any of the notices, requirements, immunities, rights, benefits, protections, limitations of liability, and other provisions of the Colorado Governmental Immunity Act, C.R.S. § 24-10-101 *et seq.* and under any other applicable law.

c. This Agreement may be executed in separate counterparts, and the counterparts taken together shall constitute the whole of this Agreement. Facsimile, scanned and other electronic signatures permitted by law, for purposes of this Agreement, shall be deemed as original signatures.

d. The waiver by any Party of a breach or violation of any provision of this Agreement shall not operate as, or be construed to be, a waiver of any subsequent breach of the same or any other provision hereof.

e. This Agreement contains the entire agreement of the parties relating to the subject matter hereof and, except as provided herein, may not be modified or amended except by written agreement of the parties. In the event a court of competent jurisdiction holds any provision of this Agreement invalid or unenforceable, such holding shall not invalidate or render unenforceable any other provision of this Agreement. Neither party shall assign this Agreement without the other party's prior written consent. This Agreement shall be governed by the laws of the State of Colorado, and venue shall be in the County of Larimer, State of Colorado.

f. This Agreement is for the benefit of, and is binding upon, the parties' respective successors and assigns.

g. This Agreement may be executed by electronic signature in accordance with C.R.S. 24-71.3-101 *et seq*.

Signed by the parties on the date written above.

City of Loveland, Colorado

By: Ashlee Taylor

Title: Recreation Manager

ATTEST:

Assistant City Clerk

APPROVED AS TO FORM:

Deputy City Attorney

CITY OF LOVELAND SEAL COLORADO

Lake Loveland Recreation Club

By: Aaron McCurdy

Title: President, LLRC

STATE OF Colorado)
) ss.
COUNTY OF Larimer)

The foregoing instrument was acknowledged before me this 10 day of March, 2023 by Aaron Mccurdy.
(Insert name of individual signing on behalf of the Lake Loveland Recreation Club)

Notary's official signature

SEAL

6/18/2025
Commission expiration date

AYDEN BECKER
NOTARY PUBLIC - STATE OF COLORADO
Notary ID #20214023510
My Commission Expires 6/18/2025

EXHIBIT A

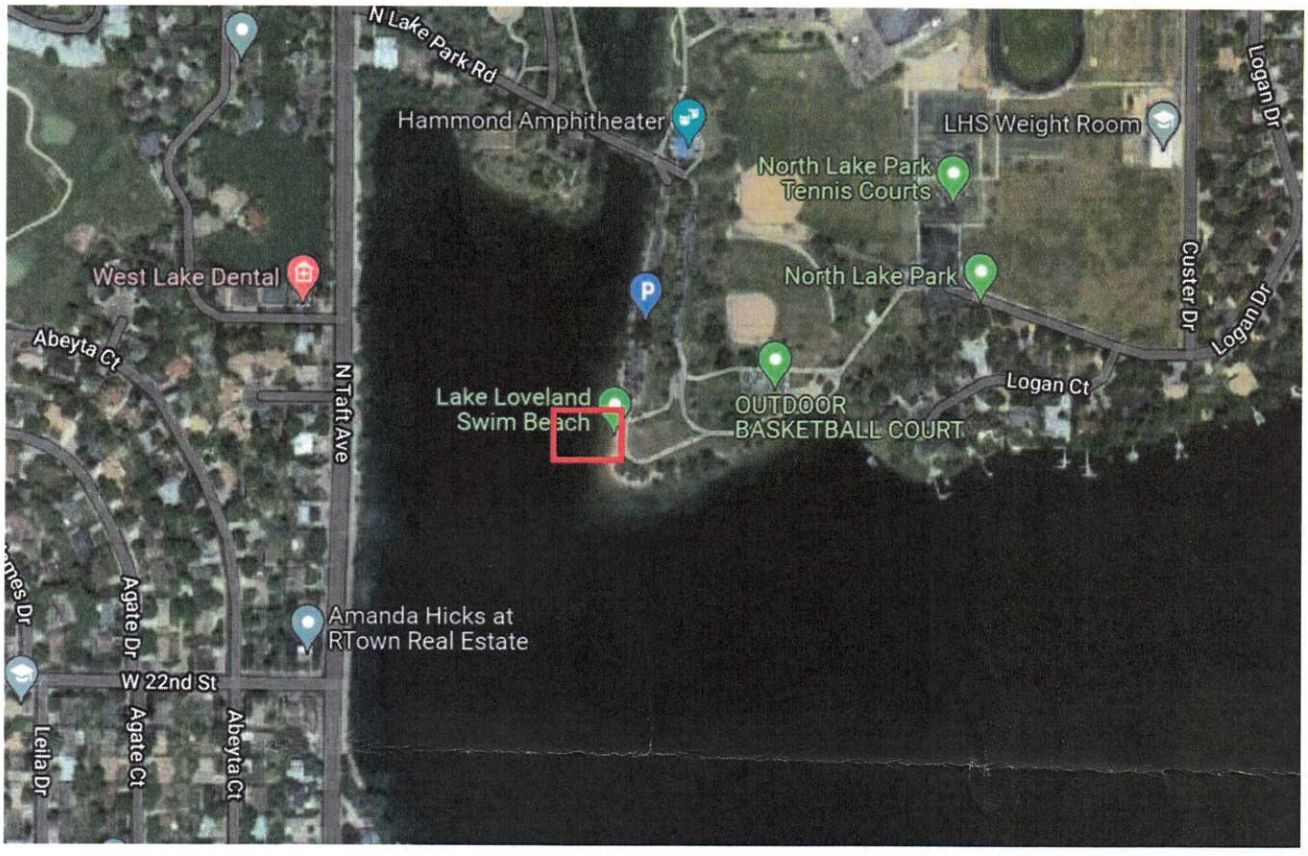

N Lake Park Rd
Hammond Amphitheater
LHS Weight Room
Logan Dr
North Lake Park
Tennis Courts
West Lake Dental
North Lake Park
Custer Dr
Logan Dr
Abeyta Ct
N Taft Ave
Lake Loveland
Swim Beach
OUTDOOR
BASKETBALL COURT
Logan Ct
Agate Dr
Amanda Hicks at
RTown Real Estate
W 22nd St
Leila Dr
Agate Ct
Abeyta Ct

EXHIBIT B

The City agrees to pay the Club for year 2023 the amount of $2163. Annual payment, pursuant to the pay rate outlined below, will be due to the Club in advance of the first day of operation each year. The Club will provide an invoice, emailed to Ashlee Taylor, ashlee.taylor@cityofloveland.org.

2023	$2163.00
2024	$2271.15
2025	$2384.71
2026	$2503.94
2027	$2659.14

MEETING DATE:	March 24, 2026
TO:	City Council
DEPARTMENT:	Loveland Utilities
DIRECTOR:	Sharon Israel
PRESENTER:	Jim Lees, Utility Accounting Manager
STRATEGIC PLAN FOCUS AREA:	Fiscal Stability & Strength

AGENDA ITEM:
RESOLUTION AMENDING THE 2026 SCHEDULE OF UTILITY RATES, CHARGES, AND FEES TO IMPLEMENT A RATE FOR THE ELECTRIC TRANSMISSION VOLTAGE SERVICE CUSTOMER CLASS, AND SUPERSEDING ALL PRIOR RESOLUTIONS ESTABLISHING SUCH RATES, CHARGES, AND FEES

RECOMMENDED CITY COUNCIL ACTION:
A motion to adopt, on second reading, Resolution #R-12-2026 amending the 2026 schedule of utility rates, charges and fees to implement a rate for the Electric Transmission Voltage Service Customer Class, and superseding all prior Resolutions establishing such rates, charges, and fees

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	If the motion is approved, this will allow an updated rate to be implemented for the Electric Transmission Voltage Service customer class (Schedule TS) as of April 1, 2026, enabling the Electric Utility to continue billing Schedule TS customers.
Deny the motion or take no action	If the motion is not approved, the Electric Utility will not have an adopted rate to bill the remaining single TS customer after April 1, 2026, which may result in a gap in service revenue collections and defer the cost of serving this customer to other rate payers until a new rate is in place.
Adopt a Modified Action	Specify in the motion, which could delay adoption of a fair and transparent rate schedule for the TS rate class, and require further legal review to avoid causing other customer classes to subsidize service costs for TS customers.
Refer back to Staff	Referring this item back to staff for further development and consideration would result in the absence of an adopted rate for TS customers as of April 1, 2026, impacting billing processes for those customers and potentially requiring service cost subsidy through rates charged to other customer classes.

SUMMARY:

Purpose: The purpose of this proposed Resolution is to establish a rate for the Electric Transmission Voltage Service (Schedule TS) customer class. Currently, there is one customer that is in this rate class, and the rate they are currently being charged is defined in a service agreement that expires on March 31, 2026. Utilities staff and the current customer discussed the expiration of the legacy contract date in 2023, and as the current expiration approached, staff engaged in further communication with the customer prior to first reading to inform them of the needed changes and the associated transition to this new rate as of April 1, 2026.

On February 18, 2026, the Loveland Utilities Commission voted unanimously (8-0) to support staff's recommendation and further recommend that the City Council approve this Resolution.

On March 3, 2026, the City Council voted unanimously (8-0) in favor of Resolution #R-12-2026. While City Resolutions typically require only one reading, Loveland Municipal Code Section 13.02.110 specifically mandates that Resolutions establishing utility fees, rates and charges be adopted over two readings. This procedural requirement ensures that changes to the City's utility rate structures undergo a rigorous public process, including a formal public hearing, mirroring the transparency of the ordinance adoption process.

Objective: The objective of this item is to establish a rate for the Schedule TS electric service class, intended to allow for continuity of billing of the only current Schedule TS customer. With the current service and rate agreement for this customer expiring on March 31, 2026, there is a need to have a rate in place to transition service when the current agreement expires.

Impact: The impact of adopting this new rate will enable the city to continue to bill and collect revenue from this Schedule TS customer and cover the Utility's cost of service for this customer.

Council Follow-up: N/A

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A - the adoption of this rate will just allow for the continuation of billing this Schedule TS customer.
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A

	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	N/A

STRATEGIC PLAN FOCUS AREA

Focus	Fiscal Stability & Strength
Strategy (if applicable)	Address Imbalance Between Revenue & Expenses
Priority (if applicable)	Review Exisiting and New Revenue Options
Notes	

COUNCIL OR BOARD/COMMISSION REVIEW:

Type of Meeting:
1) Loveland Utilities Commission - February 18, 2026
2) City Council Meeting - March 3, 2026

Date of Meeting:

Resulting Vote:
1) This item was presented to the Loveland Utilities Commission at the February 18, 2026 meeting. A motion recommending that City Council adopt this resolution was approved by a vote of 8-0.
2) City Council voted 8-0 in favor of Resolution #R-12-2026.

Discussion:
1) During their February meeting, members of the Loveland Utilities Commission discussed the city's cost of service rate development philosophy and supported the city team's approach to developing rates charged to different customers classes, especially for large load customers. There was unanimous support for the rate schedule established in this Resolution.
2) At the March 3, 2026 City Council meeting, there were questions from Council about A) how long has staff known about PRPA's transition to the Southwest Power Pool (SPP); B) what has been done communication-wise with the only current Schedule TS customer regarding this proposed rate; and C) if the current contract with the Schedule TS customer was extended, what would be the revenue impact and who would cover it. In response to Council's questions, staff's answers were; A) PRPA's transition to the SPP was known at the time that the contract with the Schedule TS customer was extended, at the end of 2023, with the potential that the PRPA's transition could occur as early as April 1, 2026; B) The Utilities Department has a Key Accounts program for outreach to large commercial customers, with a staff member dedicated to this customer for the program. This staff member has met regularly with the affected customer and has a relationship with the Loveland Plant Manager. In mid-2025, meetings with the customer, Utilities staff and PRPA staff took place to discuss what service interruptions could look like for the customer upon PRPA's entrance into the SPP. While the final steps for transitioning to the updated energy rate moved more quickly over the past few months, staff

have reached out to the customer to explain the changes; C) If the current contract with the customer is extended, it could create a hole in the revenue needed to cover the utility's cost of service, which could lead to needing to adjust the rates for other customer classes to fill that hole. The rate staff is proposing avoids this revenue shortfall and ensures no subsidy by other customer rate classes will occur.

BACKGROUND:

History:

When establishing electric rates, the City team's philosophy is to ensure each class of customer is charged a fair and transparent rate that provides sufficient revenue for the City to cover the cost of serving that customer class. This "cost of service" philosophy is the foundation of sustainably operating the Electric Utility as a not-for-profit enterprise.

Currently, there is one large commercial electric customer in the Transmission Voltage Service (Schedule TS) rate class that is on a contract rate. The contract expires on the date of Platte River Power Authority's entrance into the Southwest Power Pool Regional Transmission Organization, which is April 1, 2026. The expiration of the contract creates the need for the development of a new rate structure for this customer and other future customers that meet the criteria of a Transmission Voltage Service customer. This item is to propose a new rate structure for the Schedule TS rate class that will be published in the Utility Rates, Charges and Fees document.

The Utilities team worked with our Power Rate Consultant, Mark Beauchamp of Utility Financial Solutions, to develop this rate structure. An underlying assumption that is paramount to this proposed rate structure is that since a Schedule TS customer is fed directly off the transmission grid, they are essentially like the City of Loveland's entire distribution system, since it also is fed off PRPA's transmission grid. Therefore, it makes sense to design the rate structure for the Schedule TS class in a manner that parallels how the City of Loveland is billed by PRPA each month for purchased power. With that assumption as the primary driver for this rate design, there are four components that are proposed for the Schedule TS rate structure:

1. **Monthly Base Charge:** $18,188.28 X the Schedule TS customer's percentage share of PRPA's total energy delivered to the four member cities.

   PRPA has fixed charges (e.g. administrative, debt service, energy efficiency programs) that it allocates the cost to each of the four cities based on their percentage share of PRPA's total energy delivered. These fixed charges are called Owner Community Charges by PRPA, so it makes sense to apply the same cost allocation methodology to Schedule TS customers and have them be responsible for their portion based on the percentage share of energy they consume of PRPA's total delivered energy. This percentage would be based on the three prior years' annual averages and would stay the same throughout the year.

2. **Energy Charge:** $0.04810/kWh

   The City of Loveland (COL) is billed each month by PRPA for energy purchased based on fixed and variable energy rates from PRPA, so a Schedule TS customer would be billed in the same fashion.

3. **Transmission Demand Charge:** $7.60/kW (rate stays the same throughout the year)

   The COL is billed each month by PRPA for its system peak demand kW. A Schedule TS customer would be billed for what its kW share is of COL's monthly system peak demand.

4. **Generation Demand Charge:** $7.13/kW in Non-summer months (January – May, October – December) and $8.77/kW in Summer months (June – September)

   The COL is billed each month by PRPA for its share of PRPA's system peak demand kW. A Schedule TS customer would also be billed for what its kW share is of PRPA's monthly system peak demand.

The total of these four components would be the monthly billing for a Schedule TS customer. In accordance with the City's standard billing practice, charges to cover Payment in Lieu of Tax and a small administrative charge are included in this calculation. If approved, this rate structure would go into effect April 1, 2026.

Outreach and Notification Efforts: Utilities staff has reached out to the current Schedule TS customer to inform them of the proposed changes.

Conditions met/or anticipated: N/A

Start and End Dates (of studies, design, construction, or in service/operational): The new rate would go into effect on April 1, 2026.

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Resolution
Att 1 Staff Presentation

FIRST READING: March 3, 2025

SECOND READING: March 24, 2026

RESOLUTION #R-12-2026

A RESOLUTION AMENDING THE 2026 SCHEDULE OF UTILITY RATES, CHARGES, AND FEES TO IMPLEMENT A RATE FOR THE ELECTRIC TRANSMISSION VOLTAGE SERVICE CUSTOMER CLASS, AND SUPERSEDING ALL PRIOR RESOLUTIONS ESTABLISHING SUCH RATES, CHARGES, AND FEES

WHEREAS, Section 3.04.025 of the Loveland Municipal Code provides that the City Council shall, by resolution, fix the rates, charges, and fees to be collected by the City for goods and services provided by the City; and

WHEREAS, the City Council last set the rates, charges, and fees for the City's Water and Power Department (now known as the Utilities Department) in Resolution #R-74-2025; and

WHEREAS, since the City Council adopted Resolution #R-74-2025, the Utilities Department identified a rate update needed for an existing commercial customer class, and completed a study to determine the appropriate adjustment to the City's Schedule of Rates, Charges, and Fees; and

WHEREAS, a customer class is typically developed to ensure that customers with similar usage characteristics are grouped and billed for usage in a consistent manner; and

WHEREAS, the City Council periodically adjusts the rates, charges, and fees for services to more accurately reflect the cost of providing said services to customers; and

WHEREAS, the City Council desires to adopt an updated electrical rate for commercial customers to be collected by the City's Utilities Department by supplementing the City's Schedule of Rates, Charges, and Fees to incorporate the Schedule TS (Transmission Voltage Service) appendix attached hereto and incorporated herein as **Exhibit A**.

NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF LOVELAND, COLORADO:

Section 1. That the "Schedule TS - Transmission Voltage Service" appendix to the City's Schedule of Rates, Charges, and Fees, as set forth in Exhibit A, is hereby adopted for all billings mailed on or after April 1, 2026.

Section 2. That this Resolution shall supersede in all respects all previous agreements and resolutions of the City Council which set the rates, charges, and fees now being set, including Resolutions #R-100-2021 and #R-74-2025, for all billings mailed on or after April 1, 2026.

Section 3. That, notwithstanding the foregoing, the rates, charges, and fees otherwise set forth in Resolution #R-74-2025, shall continue in full force and effect from the date of that Resolution until they are superseded by subsequent action of this Council.

Section 4. That this Resolution shall take effect as of the date of its adoption on second reading.

ADOPTED this 24th day of March, 2026.

_____
Patrick McFall, Mayor

ATTEST:

_____
Ashley Macdonald, City Clerk

APPROVED AS TO FORM:

_____
Senior Assistant City Attorney

Schedule TS Appendix

Schedule TS • Transmission Voltage Service

Eligibility Requirements

Transmission Voltage Service is available to any customer:

1. Whose load is of sufficient magnitude or of an unusual nature such that it cannot be served from the distribution system; and
2. Whose premises are adjacent to transmission lines that are, or by contract can become, lines that supply wholesale power to the City's system

Character of Service

The power furnished under Schedule TS shall be three-phase alternating current and approximately 60 hertz, and delivered at approximately 115kV, or at other voltages subject to conditions as agreed upon, metered at each delivery point.

Charges for Service

The charges for service under Schedule TS can be found in the Electric Rates and Fees section of this document under the heading Transmission Voltage Service. The rate for service delivered under Schedule TS shall at a minimum be sufficient to recover the City's cost of service, including, without limitation, wholesale rates and the City's projected operating and maintenance costs. In addition, the customer shall be responsible for power factor charges.

Definitions: For the purposes of the Transmission Voltage Service Rate, the following definitions shall apply:

1. **Monthly Base Charge:** Calculated by taking an annual fixed dollar amount and multiplying by the customer's percentage share of Platte River Power Authority's (PRPA) annual energy delivered to the four PRPA member cities. The percentage share calculation is updated annually and is based on the three prior years' annual averages. The calculated percentage share stays the same throughout the year.

2. **Transmission Demand:** The 60-minute integrated demand recorded during the City of Loveland's system peak hour and day in the billing period.

3. **Generation Demand:** The 60-minute integrated demand recorded during PRPA's system peak hour and day in the billing period.

Monthly Rate
Rates will be updated annually to reflect the cost of service to the customer class, and shall include the following:

	Transmission Voltage Service Schedule TS
Monthly base charge	Based on cost of service
Monthly minimum bill	Yes
Energy charge per kWh	All kWh consumed, per kWh, based on cost of service
Transmission demand charge	All billed Transmission demand, per kW, based on cost of service
* Generation demand charge	All billed Generation demand, per kW, based on cost of service
Power factor charge	100% of the power factor charge incurred by the City on account of and attributable to service to the customer may be billed to the customer.
**Note: There are different summer rates (June –Sept) verses non-summer rates (Jan-May, Oct-Dec) for this category.*	

2026 Schedule TS Rate (effective April 1, 2026)

Transmission Voltage Service						
Schedule	**Monthly Base Charge Per Meter**	**Energy Charge per kWh**	**Transmission Demand Charge per kW**	**Generation Demand Charge Summer per kW**	**Generation Demand Charge Non-Summer per kW**	**Power Factor Charge**
Transmission Voltage Service	$18,188.28 times customer's percentage share of PRPA's total energy delivered to the four member cities.	$0.04810	$7.60	$8.77	$7.13	100% of the power factor charge incurred by the City on account of and attributable to service to the customer.

City of Loveland

New Rate for Large Commercial Electric Customers

Jim Lees

Utility Accounting Manager

March 24, 2026

Agenda

Why and What is being asked

Background

Request

Comments and Questions

City of Loveland

Why & What

Why are we here?

There is a large commercial electric customer that is currently on a contract rate. The contract expires on March 31, 2026. Therefore, there is a need to have a new rate in place on April 1, 2026 to use as the basis for billing the customer moving forward.

What are we asking from Council?

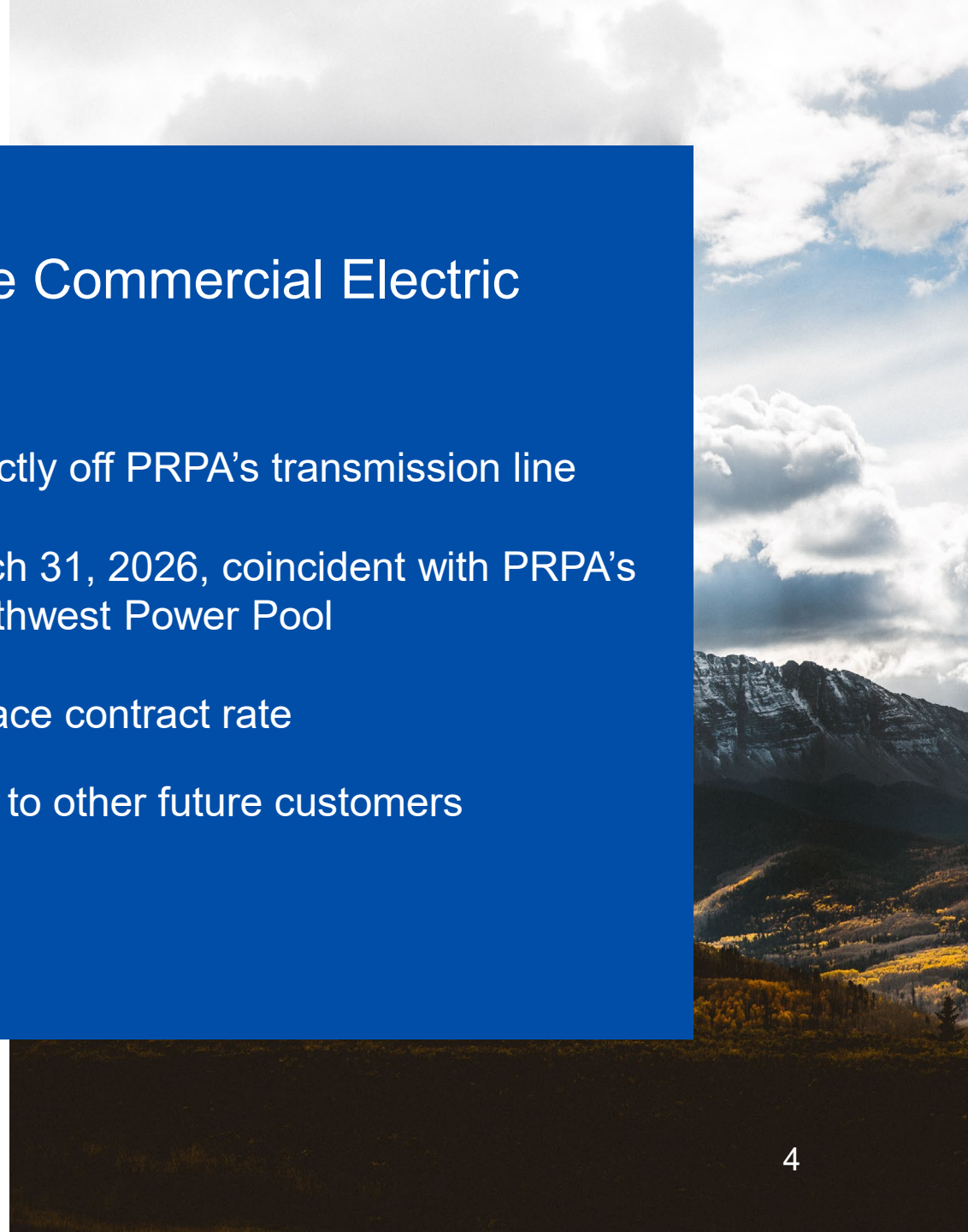
Adopt a resolution amending the City of Loveland's Utility Rates, Charges and Fees to implement a rate for the Electric Transmission Voltage Service customer class.

City of Loveland

Background

New Rate for Large Commercial Electric Customers

- Customer served directly off PRPA's transmission line
- Contract expires March 31, 2026, coincident with PRPA's entrance into the Southwest Power Pool
- Proposed rate to replace contract rate
- Rate could also apply to other future customers



City of Loveland

New Rate for Large Commercial Electric Customers

Description	Rate
Monthly Base Charge	$18,188.28 x customer's % share of PRPA energy delivered
Energy Charge	$0.04810 per kWh
Transmission Demand Charge	$7.60 per kW *(Based on demand at time of COL's monthly peak demand.)*
Generation Demand Charge	$7.13 per kW for Non-summer months $8.77 per kW for Summer months *(Based on demand at time of PRPA's monthly peak demand.)*

- Rate structure parallels how COL is billed by PRPA
- New rate structure would go into effect 4/1/2026

City of Loveland

Request

Seeking the following motion by City Council:

Adopt a Resolution Amending the City of Loveland's Utility Rates, Charges and Fees to Implement a Rate for the Electric Transmission Voltage Service Customer Class.

City of Loveland

City of Loveland

Public Comment & Council Questions

MEETING DATE: March 24, 2026
TO: City Council
DEPARTMENT: Fire Rescue Authority
DIRECTOR:
PRESENTER: Sarah Winter

AGENDA ITEM:
AN ORDINANCE REPEALING AND REENACTING CHAPTER 15.28 OF THE LOVELAND MUNICIPAL CODE AND ADOPTING BY REFERENCE THE LOVELAND FIRE RESCUE AUTHORITY WILDFIRE RESILIENCY CODE, 2026 EDITION

RECOMMENDED CITY COUNCIL ACTION:
A motion to approve, on first reading, Ordinance No. 6822 repealing and reenacting chapter 15.28 of the Loveland Municipal Code and adopting by reference the Loveland Fire Rescue Authority Wildfire Resilience Code, 2026 Edition

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	Approval of the ordinance would make the City current with the most recent standards for wildfire risk reduction and resiliency and apply the correct process for adoption of the 2024 IFC.
Deny the motion or take no action	Denial will delay implementation of new local and statewide standards to reduce the risk of wildfire spread and possibly negatively affect property insurance coverage.
Adopt a Modified Action	Specify in motion
Refer back to Staff	A referral back to staff, if adoption of the relevant ordinances does not occur prior to April 1, 2026, the aforementioned trigger non-compliance with Colorado SB23-166.

SUMMARY:

Purpose: On September 16, 2025, City Council adopted the 2024 IFC via Ordinance No. 6787. However, the adoption process did not include certain notices and a public hearing, required under C.R.S. §31-16-203. So, the purpose of the proposed ordinance will repeal and re-adopt the 2024 IFC. Likewise, this item will repeal the 2021 Loveland Fire Rescue Authority Appendix O, of the 2021 International Fire Code (IFC). The updated code before Council (2026 LFRA Wildfire Resiliency Code) reflects a combination of LFRA's existing wildfire risk reduction code (Appendix O) and the 2025 Colorado Wildfire Resiliency Code.

Objective: The objective of this item is to adopt wildfire safety standards that are the most current in the industry in an effort to preserve the health, safety, and welfare of the Loveland community.

Impact: The impact of adopting the proposed ordinance would simultaneously avoid a state-imposed deadline for adoption and enforcement of the Colorado WRC.

Council Follow-up: N/A

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A
	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	N/A

STRATEGIC PLAN FOCUS AREA

Focus	N/A
Strategy (if applicable)	N/A
Priority (if applicable)	N/A
Notes	

COUNCIL OR BOARD/COMMISSION REVIEW:

Type of Meeting:
1) Loveland Fire Rescue Authority Meeting – January 28, 2026
2) Loveland Fire Rescue Advisory Commission – August 6, 2025
3) Larimer Board of County Commissioners – September 22, 2025
4) Town of Johnstown Council – December 1, 2025

Resulting Vote:
1) On January 28, the Loveland Fire Rescue Authority Board of Directors voted unanimously to approve the adoption of the 2026 LFRA Wildfire Resiliency Code, and repeal Appendix O of the 2021 International Fire Code.
2) Voted unanimously in favor of adopting and approving the 2026 LFRA Wildfire Resiliency Code.
3) Passed with a vote of 3-0.
4) Passed with a vote of 7-0.

Discussion: None

BACKGROUND:
History:
The Loveland Fire Rescue Authority ("LFRA or Authority") is a political subdivision of the State of Colorado, established pursuant to the Amended and Restated Intergovernmental Agreement (Establishing IGA) between the City of Loveland and the Loveland Rural Fire Protection District dated November 29, 2017, for the purpose of providing fire suppression, fire prevention and public education, rescue, extrication, hazardous materials, and emergency medical services within their joint jurisdiction and service area. The District's jurisdiction covers portions of Larimer County and the Town of Johnstown.

Section I .9(m) of the Establishing IGA authorizes the Authority to administer and enforce the fire codes adopted by the City and the District. However, pursuant to C.R.S. § 32-1-1002(1)(d), a fire code adopted by the District can only be enforced within the City if it is first approved by the Loveland City Council.

On September 16, 2025, City Council adopted the 2024 IFC via Ordinance No. 6787. However, the adoption process did not include certain notices and a public hearing, required under C.R.S. §31-16-203. So, this item will repeal and re-adopt the 2024 IFC in accordance with such statute.

Furthermore, pursuant to the Establishing IGA, the Authority Board of Directors adopted the 2021 Edition of the International Fire Code with the local amendments, including Appendix O – Wildfire Risk Reduction and the City Council adopted the same through, making the 2021 Fire Code and Appendix O enforceable within that portion of the Authority's jurisdiction that also lies within the City.
The updated code 2026 Loveland Fire Rescue Authority Wildfire Resiliency Code combines the existing Appendix O and the new, statewide 2025 Colorado Wildfire Resiliency Code, to reduce the risk of the start and spread of wildfires and urban conflagration within the jurisdiction.

Some changes from the 2026 LFRA Wildfire Resiliency Code that affect LFRA/City of Loveland:

- The updated code continues to address and reduce the risk of wildfires in our jurisdiction, while being cognizant of affordable housing and developer recruitment and retention.

- Developed in conjunction with the Community Wildfire Protection Plan (CWPP), utilizing scientific modeling and existing fuels, geography, structures and access wildfire risk.
- Based on the successful Appendix O and the statewide CWRC.
- Combines structure hardening, fuels management and community education. Most of the construction methods and materials are already required in Loveland through Appendix O.
- Applicable to all new buildings, additions, and repairs in the Wildland Urban Interface area, including buildings designed and constructed in accordance with the International Residential Code and the International Building Code; addition and replacement of fences adjacent to parks, common areas, open space, and environmentally sensitive areas; addition and replacement of the final four feet of privacy fences connecting to a home or other structure; and addition and replacement of landscaping materials and vegetation.
- **Structure hardening:**

1. A Class A roof is required for all new occupancies or when more than 25% of the roof is replaced; exterior cladding, decks, eaves, and soffits must be constructed of ignition-resistant materials.
2. Flexibility of materials options remains in effect.

- **Fuels management:**
    a. Only ignition-resistant landscaping materials, such as decorative rock, gravel and pavers, may be used within 5 feet of the exterior of the home. Combustible mulch – for example, shredded hardwood or bark chips – is not allowed.
    b. Trees must be pruned to a height of up to 10 feet above the ground.
- **Fencing**:
    a. Very similar to existing requirements in Unified Development Code (UDC).
    b. Fences constructed adjacent to parks, common areas, open space, and environmentally sensitive areas shall be an open two- or three-rail design.
    c. Privacy fences are allowed between properties (lot lines). They must have a minimum 2-inch separation between the bottom of the fence and the ground, and the planks cannot be separated by a gap of more than 1 inch.
    d. The last 8 feet a fence or gate that connects to a home or accessory structure shall be constructed of ignition-resistant materials, such as metal, stone or composite products.
    e. Back-to-back fences and shadow box fences are prohibited.
- **Ground-truthing:**

1. Property owners may request a ground-truthing process based on a review of the vegetative fuels within 300 feet of the parcel boundary, including but not limited to topography, local weather patterns and fire behavior modeling data.

A presentation on this item can be found in **Attachment 1**.

Outreach and Notification Efforts: The Loveland Fire Rescue Authority, the Loveland Fire Rescue Advisory Commission, the Larimer Board of County Commissioners and the Town of Johnstown Council.

Conditions met/or anticipated: N/A

Start and End Dates (of studies, design, construction, or in service/operational): N/A

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Ordinance
Att 1 2026 LFRA Wildfire Resiliency Code Presentation
Att 2 LFRA Resolution No.R-181

FIRST READING: March 24, 2026

SECOND READING: _____

ORDINANCE NO. 6822

AN ORDINANCE REPEALING AND REENACTING CHAPTER 15.28 OF THE LOVELAND MUNICIPAL CODE AND ADOPTING BY REFERENCE THE LOVELAND FIRE RESCUE AUTHORITY WILDFIRE RESILIENCY CODE, 2026 EDITION

WHEREAS, pursuant to Section 4-12 of the Charter of the City of Loveland, the City Council is authorized to adopt, by ordinance, any code by reference in accordance with the procedures established by state law; and

WHEREAS, the Loveland Fire Rescue Authority Board recommended that City Council adopt the 2024 Edition of the International Fire Code (the "2024 IFC"), and amendments thereto; and

WHEREAS, on May 31, 2023, the Loveland Fire Rescue Authority Board ("Authority") approved Resolution R-156, adopting the 2021 Edition of the International Fire Code with the local amendments (collectively, "2021 Fire Code"), for enforcement within its jurisdiction. One of the local amendments to the 2021 Fire Code was Appendix O - Wildfire Risk Reduction, which focused on reducing wildfire risk based on construction hardening, landscaping, and fencing; and

WHEREAS, the City Council on June 20, 2023, adopted the 2021 IFC via Ordinance No. 6619; and

WHEREAS, on July 30, 2025, the Authority approved Resolution R-175, adopting the 2024 Edition of the International Fire Code with local amendments (collectively, "2024 IFC"), for enforcement within its jurisdiction. However, the 2024 IFC adopted by the Authority omitted specific requirements for wildfire risk reduction because Colorado Senate Bill SB23- l66 had created a Wildfire Resiliency Code Board tasked with creating a statewide wildfire resiliency code that also sought to reduce the risk of wildfire through construction hardening and site and area design. The state Wildfire Resiliency Code ("2025 State WRC") was adopted by the Wildfire Resiliency Code Board on July 1, 2025; and

WHEREAS, the City Council on September 16, 2025, adopted the 2024 IFC via Ordinance No. 6787 but the City wishes to repeal and reenact the 2024 IFC consistent with the adoption process contemplated in C.R.S. §31-16-203; and

WHEREAS, LFRA staff have prepared the Loveland Fire Rescue Authority Wildfire Resiliency Code, 2026 Edition ("2026 LFRA WRC"), attached hereto as Exhibit A, which

combines the requirements of former Appendix O and the 2025 State WRC to create wildfire reduction measures at least as stringent as the 2025 State WRC, as is allowed by law; and

WHEREAS, the City Council conducted a public hearing pursuant to C.R.S. §31-16-203 concerning the adoption of the 2024 IFC by reference and the 2026 LFRA WRC by reference and finds and determines that it is necessary to the health, safety, general welfare of the public that the City regulate conditions hazardous to life and property by the adoption of the 2024 IFC and the 2026 LFRA WRC, and certain amendments and modifications thereto.

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LOVELAND, COLORADO:

Section 1. Chapter 15.28 of the Loveland Municipal Code is hereby repealed in its entirety and reenacted to read as follows:

CHAPTER 15.28. - FIRE CODE

15.28.010 - International Fire Code, 2024 Edition—Adopted.

The International Fire Code 2024 Edition, issued and published by the International Code Council, 4051 West Flossmoor Road, Country Club Hills, IL 60478-5795, including appendices B, C, D, E, F, G, H, I, and O is hereby adopted by reference as the fire code of the City. Additionally, the City hereby adopts the Loveland Fire Rescue Authority Wildfire Resiliency Code, 2026 Edition. The purpose of the fire code and the wildfire resiliency code is to provide minimum standards to safeguard life and limb, health, property and the public welfare by regulating fire and explosion hazards arising from the storage, handling and use of hazardous substances, materials and devices, and from conditions hazardous to life or property in the occupancy of buildings and premises; and to provide for the issuance of permits and collection of fees therefore. At least one copy of the International Fire Code, 2024 Edition, and a copy of the 2026 Loveland Fire Rescue Authority Wildfire Resiliency Code which have been certified by the Mayor and City Clerk, shall be on file in the office of the City Clerk, and may be inspected during regular business hours.

15.28.020 - Modifications to International Fire Code—2024 Edition.

The International Fire Code, 2024 Edition, adopted in this chapter, is modified as follows:

A. Section 101.1 – Title - is amended to read as follows:

> These regulations shall be known as the Fire Code of the Loveland Fire Rescue Authority, hereinafter referred to as “this code.”

B. A new Section 102.7.3 – Editions of codes and standards - is added and reads as follows:

> In addition to the codes and standards in Chapter 80, designers may utilize the most current editions of codes and standards, as approved by the fire code official.

C. Section 105.5 – Operational Permits – is amended to read as follows:

The fire code official is authorized to issue operational permits for the operations set forth in Sections 105.5.2 through 105.5.53.

D. Section 105.5.18 – Flammable and combustible liquids - is amended to read as follows, with the remainder of the section unchanged:

An operational permit is required:

2. To store, handle or use Class I liquids in excess of 10 gallons in a building or in excess of 50 gallons outside of a building, except that a permit is not required for the following: (2.1 and 2.2 remain unchanged)

3. To store, handle or use Class II or Class IIIA liquids in excess of 50 gallons in a building or in excess of 249 gallons outside a building, except for fuel oil used in connection with oil-burning equipment.

E. Section 105.5.34 – Mobile food preparation vehicles – is amended to read as follows:

A permit is required for mobile food preparation vehicles equipped with appliances that produce smoke or grease-laden vapors, use liquified petroleum gases (LP-gas), or that utilize generators using combustible or flammable liquid fuels. Mobile food preparation vehicles shall be required to comply with NFPA 96 (2024): Standard of Ventilation Control and Fire Protection of Commercial Cooking Operations, as well as specific policies approved by the fire code official.

F. Section 105.5.40 – Outdoor assembly event – is amended to read as follows:

An operational permit is required to conduct an outdoor assembly event where planned attendance exceeds 1,000 persons, or where the event includes high-risk activities as defined in Chapter 2 of this code.

G. Section 105.5.51 – Temporary membrane structures and tents – is amended to read as follows:

An operational permit is required to operate an air-supported temporary membrane structure, a temporary special event structure or a tent having an area in excess of 700 square feet.

H. Section 105.6.25 – Temporary tents, stages, and membrane structures – is amended to read as follows:

A construction permit is required to erect a temporary stage with a surface area of 400 square feet or greater. A construction permit is required to erect an air-supported temporary membrane structure, a temporary special event structure or a tent in accordance with Section 105.5.51.

I. Section 112.3 – Qualifications – is deleted in its entirety.

J. Section 113.4 – Violation penalties – is amended to read as follows:

Persons who shall violate a provision of this code or shall fail to comply with any of the requirements thereof or who shall erect, install, alter, repair or do work in violation of the approved construction documents or directive of the fire code official, or of a permit or certificate used under provisions of this code, shall be guilty of a misdemeanor, and upon conviction shall be subject to the penalties, costs and orders as provided by $100. Each day that a violation continues after due notice has been served shall be deemed a separate offense.

K. Section 114.4 – Failure to comply – is amended to read as follows:

Any person who shall continue work after having been issued a stop work order, except such work as that person is directed to perform to remove a violation or unsafe condition, shall be liable to a fine of $500.

L. A new Section 116 – Reporting of emergencies and false alarms – is added and reads as follows:

SECTION 116 REPORTING OF EMERGENCIES AND FALSE ALARMS

116.1 General. Reporting of fires and hazardous materials releases shall be in accordance with Section 116.

116.2 Reporting emergencies. In the event a fire occurs or the discovery of a fire, smoke or unauthorized release of flammable, combustible or hazardous materials on any property occurs, the owner, owner's authorized representative or occupant shall without delay report such condition to the fire department.

116.3 False alarms. False alarms shall not be given, signaled or transmitted or caused or permitted to be given, signaled or transmitted in any manner.

M. Section 202 – Definitions – is amended by the addition of new definitions, to read as follows:

CROSS SLOPE. A geometric feature of roadway, measured at right angles to vehicle alignment; the transverse slope with respect to the horizon.

FIRE APPARATUS ACCESS DRIVE. A type of private roadway for local access that leads from a street or drive, either public or private, to a property, typically commercial or multi-family.

FIRE APPARATUS ACCESS ROAD. A road that provides fire apparatus access from a fire station to a facility, building or portion thereof. This is a general term inclusive of all other terms such as fire apparatus access drive, fire lane, public street, private street, parking lot lane, and access roadway.

HIGH-RISK ACTIVITIES. Special events shall be deemed to be *high-risk activities* if they include the following proposed activities: display of fireworks before a proximate audience, high-speed operation of motor vehicles, mobile food vendors, parades, races, temporary road

closures, inflatable attractions, or public alcohol sales and/or consumption.

PERMISSIBLE FIREWORKS. Fireworks as defined in Colorado statute 8 CCR 1507-12; generally, those small firework devices designed primarily to produce visible and audible effects by combustion and that burn without explosion, and do not produce a loud report or disburse any metal, glass, or brittle plastic fragments.

RURAL FIRE FLOW AREA. The geographic area as determined by the *fire code official* that historically has had limited fire flow. These areas may or may not be served by a public or private water district/provider.

URBAN FIRE FLOW AREA. The geographic area as determined by the *fire code official* that historically has had adequate fire flow. These areas are typically served by a public or private water district.

N. Section 307.1.1 – Prohibited open burning – is amended to read as follows:

Open burning shall be prohibited when atmospheric conditions or local circumstances make such fire hazardous. Open burning shall be specifically prohibited during active Red Flag Warnings.

Exceptions: Prescribed burning for the purpose of reducing the impact of wildland fire when authorized by the fire code official. Agricultural burning that is approved by *the fire code official* and is conducted in accordance with Colorado Air Quality Control Commission Regulation Number 9 (5 CCR 1001-11).

O. Section 307.2 – Permit required – is amended to read as follows:

A permit shall be obtained from the county health department of jurisdiction in accordance with Section 105.5.36 prior to kindling a fire for recognized silvicultural or range or wildlife management practices, or prevention or control of disease or pests. Application for such approval shall only be presented by and permits issued to the owner of the land on which the fire is to be kindled.

P. Section 308.1.7 – Sky lanterns – is amended to read as follows:

The use, lighting, tethering, or release of sky lanterns is prohibited.

Q. Section 311.5 – Placards – is amended to read as follows:

The fire code official is authorized to require any vacant or abandoned buildings or structures determined to be unsafe pursuant to Section 115 of this code to be marked as required by Sections 311.5.1 through Section 311.5.5.

R. A new Section 408 – Automatic external defibrillators – is added and reads as follows:

SECTION 408 – AUTOMATIC EXTERNAL DEFIBRILLATORS

408.1 General. Automatic External Defibrillators (AEDs) are required to be installed in all

new occupancies with an occupant load of 100 or more. These locations include but are not limited to fitness centers and gyms, schools, medical and dental offices and clinics, shopping malls and their anchor stores, Assembly Occupancies and large offices.

408.2 Display. AEDs shall be placed in highly visible and easily accessible locations with clear signage, such as building entries, reception areas or common gathering areas. They shall remain conspicuous and not obstructed or obscured from view.

408.3 Mounting height. AEDs or their holding cabinets shall be installed so that the bottom is not more than 48 inches above the floor.

408.4 Clear floor space. A clear floor space of at least 30 inches by 48 inches must be provided in front of the AED to allow for wheelchair access and maneuvering.

408.5 Protruding objects. AEDs mounted on walls or installed in cabinets shall not protrude more than 4 inches into circulation paths or in compliance with Section 1003.3 if the measurement differs due to mounting location.

408.6 Training. While AEDs are designed to be user-friendly and able to be operated by both professionals and laypeople, employees must receive annual training on how to operate the device in case of an emergency.

S. Section 503.1 – Where required – is amended to read as follows:

Fire apparatus access roads shall be provided and maintained in accordance with Sections 503.1 through 503.6 and Appendix D “Fire Apparatus Access Roads.”

T. Section 503.1.1 – Buildings and facilities Exception 1.1 is amended to read as follows:

If the building is equipped throughout with an approved automatic sprinkler system installed in accordance with 903.3.1.1, 903.3.1.2 or 903.3.1.3, the distance is allowed to increase to within 300 feet of all portions of the first-floor exterior walls.

U. Section 503.1.1 – Exception 1.3 - is deleted in its entirety.

V. Section 503.1.2 – Additional access – is amended to read as follows:

A minimum of two approved fire-apparatus access roads shall be provided to each new residential development or new commercial or multi-family building within the jurisdiction. If multiple fire apparatus access roadways cannot be provided, all occupiable structures that are located more than 660 feet from the last roadway providing access from two directions, as measured from the centerline of this last roadway, shall be protected with an approved automatic fire sprinkler system.

Exception: Where all occupiable structures beyond 660 feet (201 m) of the centerline of the last roadway providing access to the dead-end road are equipped throughout with an

approved automatic sprinkler system in accordance with Section 903.3.1.1, 903.3.1.2 or 903.3.1.3.3, access from two directions shall not be required.

W. Section 503.1.2.1 – Minimum two access roads – is amended to read as follows:

A minimum of two approved fire-apparatus access roads shall be provided to each new residential development or new commercial or multi-family building within the jurisdiction. If multiple fire apparatus access roadways cannot be provided, all occupiable structures that are located more than 660 feet from the last roadway providing access from two directions, as measured from the centerline of this last roadway, shall be protected with an approved automatic fire sprinkler system.

X. Section 503.1.2.2 – Minimum two access drives – is amended by the addition of a new Section 503.1.2.1 to read as follows:

A minimum of two approved fire-apparatus access drives shall be provided to each building or portion of building hereafter constructed or moved into the jurisdiction. These drives are provided from the public or private roadway.

Exception: A driveway to a one-family or two-family dwelling.

Y. A new Section 503.1.4 – Limited access – is added and reads as follows:

The fire code official is authorized to modify the fire-apparatus access requirements due to existing waterways, topography, hazards or other factors.

Z. Section 503.2 – Specifications – is amended to read as follows:

Fire apparatus access roads shall be installed and arranged in accordance with Section 503 and Appendix D “Fire Apparatus Access Roads.”

AA. Section 503.2.7 – Grade – is amended to read as follows:

Fire apparatus access roads shall not exceed 10 percent in grade.

Exception: Grades steeper than 10 percent as approved by the fire code official.

BB. Section 503.2.8 – Angles of approach and departure - is amended to read as follows:

Grade changes upon a fire apparatus access road or when entering or exiting from or to a fire apparatus access road, shall not exceed a 10 percent angle of approach or angle of departure.

CC. A new Section 503.2.9 – Cross slope - is added and reads as follows:

Cross slope grade of fire apparatus access roads shall not exceed 5 percent.

DD. A new Section 503.7 – Bumpouts – is added and reads as follows:

For new developments with rural roads longer than 1,000 feet, approved bumpouts

(turnouts) shall be constructed at approximately every 660 feet of road. Greater distances may be allowed if needed to maintain safe sight distance. The bumpouts shall be designed in accordance with Figure D103.7, constructed to allow turning movements to be made by emergency vehicles, and be an all-weather road surface at least 8 feet wide and 30 feet in length.

EE. Section 505.1 –Address identification - is amended to read as follows:

New and existing buildings or facilities shall be provided with *approved* address identification. The address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification characters shall contrast with the color of their background. Address numerals shall be Arabic numbers and street names, if required to be installed with the numerals, shall be alphabet letters. Numbers shall not be spelled out with alphabet letters. Address identification shall be maintained.

505.1.1 Addresses shall be assigned by the governmental entity having jurisdiction (City of Loveland, Town of Johnstown or Larimer County) and shall comply with the Larimer County Street Naming and Addressing Standards as contained in the Larimer County Urban Area Street Standards.

505.1.2 The approved address numerals shall be visible from the street fronting the property, and posted on a contrasting background. Bronze or brass numerals shall not be posted on a brick background.

505.1.3 The address numerals for any commercial or industrial buildings shall be placed at a height to be clearly visible from the street. (For purposes of sizing and location of address letters or numerals, building height includes the façade or parapet wall.) Where required by the fire code official, additional address and/or exterior door identification shall be provided in approved locations to facilitate emergency response.

505.1.4 Where access is by means of a private road and the building cannot be viewed from the public way, a monument, pole or other sign or means shall be used to identify the structure.

505.1.5 Commercial or multiple-family buildings shall have numerals with a minimum height of six inches and stroke width of one-half inch. Buildings three or more stories in height or with a total floor area of 15,000 to 50,000 square feet, shall have numerals with a minimum eight-inch height and stroke width of one inch. Buildings with a total floor area of 50,000 square feet or greater shall have numerals with a minimum height of 12 inches and stroke width of 1.5 inches.

505.1.6 One- and two-family dwelling units, excluding townhouses, shall have a minimum four-inch high numerals, with a minimum stroke width of one-

half inch. Townhouses shall have numerals with a minimum height of six inches and stroke width of one-half inch.

505.1.7 Individual suite or unit addresses shall be displayed with minimum four-inch high numerals, with a minimum stroke width of one-half inch.

505.1.8 Monument signs shall not be used in lieu of address numerals on the building.

505.1.9 Buildings with multiple suites, apartments or units shall have the individual suites, apartments or units provided with individual identification numbers in an approved, sequential order. Suites, apartments or units located on the first floor shall be identified by numbers within the 100 or 1000 range or series; Suites, apartments or units located on the second floor shall be identified by numbers within the 200 or 2000 range or series; Suites, apartments or units located on the third floor units shall be identified by numbers within the 300 or 3000 range or series. Higher floors shall follow this same numbering scheme. Floors below grade shall be identified with numerals within the 0100 range on the first floor below grade and 0200 on the second floor below grade; lower floors shall follow the same numbering pattern.

505.1.10 Buildings, either individually or part of a multi-building complex, that have emergency access lanes on sides other than on the addressed street side, may be required to have the address numerals and street name on each side that fronts the fire lane(s).

505.1.11 Buildings that are addressed on one street, but are accessible from an adjoining street, may be required to affix the address numerals and street name on each side that is adjacent to the other street(s).

505.1.12 Approved signage shall be provided in conspicuous locations on or within buildings to provide clear direction to locate any suite, apartment or unit within the building.

505.1.13 Multiple-building complexes shall be provided with approved signage as needed to direct first responders to individual buildings.

FF. Section 507.3 – Fire flow – is amended to read as follows:

Fire flow requirements for buildings or portions of buildings and facilities shall be determined in accordance with Appendix B “Fire-flow Requirements for Buildings” of this code.

GG. Section 507.5.1.1 – Hydrant for fire department connections - is amended to read as follows:

Buildings equipped with a fire department connection shall have a fire hydrant located

within 150 feet of the fire department connection, using an approved route without obstacles. The hydrant and fire department connection shall be on the same side of the fire apparatus access road or parking lot drive aisle, unless otherwise approved by the fire code official.

Exception: The distance shall be permitted to exceed 150 feet where approved by the fire code official.

HH. A new Section 509.1.2 – Utility disconnect – is added and reads as follows:

The fire code official is authorized to approve utility disconnect locations.

II. Section 901.1 – Scope - is amended to read as follows:

The provisions of this chapter shall specify where fire protection and life safety systems are required and shall apply to the design, installation, inspection, operation, testing and maintenance of all fire protection systems. Where requirements of this code and the International Building Code are in conflict, the more restrictive shall apply.

JJ. A new Section 903.2.8.4 – Dead-end roadways – is added and reads as follows:

An approved automatic fire-sprinkler system shall be installed in all Group R occupancies, including one- and two-family residences and townhomes, when the structure is located beyond 660 feet of the entrance to a dead-end roadway, as measured from the centerline of the last roadway providing access to the dead-end road.

KK. Conditions #6 and #7 are added to Section 903.2.9 and read as follows:

6. A Group S-1 self-storage fire area exceeds 5,000 square feet (464.5 m2).

7. A Group S-1 fire area for self-storage buildings or structures of any size where individual units may be sold to an owner or owners. These buildings or structures are commonly referred to as “self-storage condominiums.”

LL. Section 903.3.1.3 – NFPA 13D and sprinkler systems - is amended to read as follows:

Automatic sprinkler systems installed in one- and two-family dwellings; Group R-3; Group R-4, Condition 1; and townhouses shall be installed throughout in accordance with NFPA 13D. All such structures with an attached garage shall include installation of at least one sprinkler above the door providing access from the garage to the structure.

MM. Section 903.3.9 – Control valves - is amended to read as follows:

Approved supervised indicating control valves shall be provided at the point of connection to the riser on each floor in all multi-story structures and to each individual tenant space in multi-tenant structures.

NN. Section 904.3.5 – Monitoring - is amended to read as follows:

All automatic fire-extinguishing systems shall be monitored by an approved fire alarm

system.

OO. A new Section 904.3.6 – Fire alarm graphic map – is added and reads as follows:

All occupancies with a fire-alarm system shall have a graphic map installed in locations approved by the fire code official.

PP. Section 905.4 Item #1is amended to read as follows:

1. In every required interior exit stairway or exterior exit stairway, a hose connection shall be provided for each story above and below grade plane. Hose connections shall be located at the main floor landing or intermediate landing, as approved by the fire code official.

QQ. Section 907.5.2 –Alarm notification appliances - is amended to read as follows:

Alarm notification appliances shall provide full occupant notification throughout the entire building or structure and shall be designed and installed in accordance with NFPA 72. All one- and two-family dwellings protected by an automatic sprinkler system shall be equipped with a minimum of one audible-visible alarm notification appliance inside the structure, in a normally occupied location. Alarm notification appliances shall be listed for their purpose.

RR. Section 1103.5.3 is amended by deletion of the bracketed sentence.

SS. Section 1103.7 – Fire alarm systems –is amended to read as follows:

An approved fire alarm system shall be installed in existing buildings and structures in accordance with Sections 1103.7.1 through 1103.7.7 and provide occupant notification in accordance with Section 907.5 unless other requirements are provided by other sections of this code.

TT. Section 3103.2 – Approval required – is amended to read as follows, with the exceptions to remain unchanged:

Temporary tents, canopies and membrane structures in excess of 700 square feet in size shall not be erected, operated or maintained for any purpose without first obtaining a permit and approval from the *fire code official*.

TT. A new Section 1103.7.7 – Alternative automatic fire-extinguishing systems - is added and reads as follows:

All automatic fire-extinguishing systems shall be monitored by an approved alarm system.

UU. Section 4001.1.1 -Nonapplicability– is amended to read as follows:

Chapter 50 and Chapter 57 are specifically applicable to the production or manufacture of distilled spirits and wines in barrels and casks, and are not applicable to storage of these items, as identified in Section 5001.1, Exception 10, and Section 5701.2, Item 10.

VV. Section 5001.1 Exception #10 is amended to read as follows:

10. The production, processing and storage of distilled spirits and wines in wooden barrels and casks when the facility is in conformance with the most recently published edition of the Distilled Spirits Council of the United States (DISCUS) "Recommended Fire Protection Practices for Distilled Spirits Beverage Facilities."

WW. Section 5601.1.3 – Fireworks - is amended to read as follows:

The possession, manufacture, storage, sale, handling and use of fireworks are prohibited unless permitted by state or local laws.

Exceptions:

4. The possession, storage, sale, handling and use of permissible fireworks in accordance with state statute and local municipal codes.

XX. Section 5601.2.2 – Sale and retail display – is amended to read as follows:

Persons shall not construct a retail display nor offer for sale explosives, explosive materials or fireworks on highways, sidewalks, public property or in any permanent building.

YY. Section 5602.1 is amended to include the term "Permissible fireworks."

ZZ. A new Section 5610 – Permissible fireworks – is added and reads as follows:

SECTION 5610 PERMISSIBLE FIREWORKS

5610.1 General. Permissible fireworks use shall be as detailed in this section and in accordance with state and local laws.

5610.2 Use of fireworks. The use of permissible fireworks shall be in accordance with Sections 5610.2.1 through 5610.2.4.

5610.2.1 It shall be unlawful for any person to possess, store, offer for sale, expose for sale, sell at retail, use, or discharge any fireworks, other than permissible fireworks.

5610.2.2 It shall be unlawful for any person to knowingly furnish to any person under 16 years of age, by gift, sale, or any other means, any fireworks, including permissible fireworks.

5610.2.3 It shall be unlawful for any person under 16 years of age to purchase fireworks, including permissible fireworks.

5610.2.4 It shall not be unlawful for a person under 16 years of age to possess and discharge permissible fireworks if such person is under adult supervision throughout the act of possession and discharge.

AAA. Section 5701.2 – Nonapplicability, Item #10 is amended to read as follows:

10. The production, processing and storage of distilled spirits and wines in wooden barrels and casks when the facility is in conformance with the most recent edition of the Distilled Spirits Council of the United States (DISCUS) "Recommended Fire Protection Practices for Distilled Spirits Beverage Facilities."

BBB. Section 5704.2.9.6.1 - Exceptions - is amended to add the following:

4. Above-ground tank storage of aviation fuels at the Northern Colorado Regional Airport fuel farm.

CCC. Section 5704.2.14.1 is amended to add the following:

7. Removal of above-ground and underground tanks shall be in accordance with federal, state and local regulations.

DDD. Section 5704.3.3 Exception 2 is amended to read as follows:

2. The production, processing and storage of distilled spirits and wines in wooden barrels and casks when the facility is in conformance with most recent edition of the Distilled Spirits Council of the United States (DISCUS) "Recommended Fire Protection Practices for Distilled Spirits Beverage Facilities."

EEE. Section 5706.2.4 – Permanent and temporary tanks - is amended to delete the exception and read as follows:

The capacity of permanent above-ground tanks containing Class I or Class II liquids shall not exceed 500 gallons, and the capacity of temporary above-ground tanks containing Class I or Class II liquids shall not exceed 2,000 gallons, unless larger amounts are approved in writing by the fire code official. Tanks shall be of single-compartment design.

FFF. Section 5706.3 is amended to add the following:

5706.3.9 Portable fire extinguishers. Portable fire extinguishers shall be located throughout the site in locations approved by the fire code official.

5706.3.10 Identification of hazards. All hazardous materials tanks or containers shall be appropriately labeled in accordance with NFPA 704, or other standards as approved by the fire code official. All hazard markings shall be maintained by the operator.

5706.3.11 Access roads. All access roads to well drilling and operating facilities shall comply with Section 503 and Appendix D "Fire Apparatus Access Roads" of this code.

5706.3.12 Facility security. All fences and gates installed to provide facility security shall comply with Sections 503.5, 503.6 and D103.5 of this code. The fire code official

may require a Knox Box, Knox switch, or Knox padlock to be installed by the operator to provide fire department access to the site.

5706.3.13 Safety regulations. All oil and gas locations shall comply with all Colorado Energy and Carbon Management Commission (CEMC) rules. CEMC Rule 600 shall be specifically addressed for all site safety requirements.

5706.3.13 Abandonment of flowlines. Flowlines used to transport or convey flammable or combustible liquids shall not be abandoned in place, but shall be completely removed from the ground.

GGG. Section 5706.4 is amended to add the following:

5706.4.11 Abandonment of flowlines. Flowlines used to transport or convey flammable or combustible liquids shall not be abandoned in place, but shall be completely removed from the ground.

HHH. Section 6104.2 – Maximum capacity within established limits - is amended to read as follows:

Within the limits established by law restricting the storage of liquefied petroleum gas for the protection of heavily populated or congested areas, the aggregate capacity of any one installation shall not exceed the limits established by ordinance and/or zoning regulation adopted by the local government with jurisdiction.

Exception: In particular installations, this capacity limit shall be determined by the *fire code official*, after consideration of special features such as topographical conditions, nature of occupancy, and proximity to buildings, capacity of proposed LP-gas containers, degree of fire protection to be provided and capabilities of the local fire department. These provisions shall not be interpreted so as to conflict with the provisions of Colorado Revised Statutes Title 8, Article 20 of Title 34 as amended. In the event of any conflict, the more restrictive provision shall prevail.

III. Chapter 80 – Referenced Standards – is amended by adding the following additional referenced standards in alphabetical and numerical sequence:

CECM
Colorado Energy and Carbon Management Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203
Rule 600: Safety Regulations
Referenced in Section 5706

DISCUS
Distilled Spirits Council of the United States
1250 Eye Street, NW Suite 400
Washington, DC 20005
Recommended Fire Protection Practices For Distilled Spirits Beverage Facilities, 3rd

Edition, June 2005
Referenced in Sections 5001.1, 5701.2 and 5704.3.3

APPENDICES

Only the 2024 International Fire Code appendices listed herein are adopted.

JJJ. Appendix B – Fire-flow Requirements for Buildings – is adopted in its entirety with the following amendments:

KKK. Section B105.1 - One- and two-family dwellings, Group R-3 and R-4 buildings and townhouses. - is amended to read as follows:

> In the urban fire-flow area, the minimum fire-flow and flow duration requirements for one- and two-family dwellings, Group R-3 and R-4 buildings and townhouses up to 3,600 square feet in area shall be 1,000 gpm, with a flow duration of 1 hour. In rural fire-flow areas, minimum fire-flow and flow duration shall be 500 gallons per minute, with a flow duration of 1 hour, for one- and two-family dwellings, Group R-3 and R-4 and townhomes less than 3,600 square feet in area.
>
> For any one- and two-family dwellings, including Group R-3 and R-4 and townhouses exceeding 3,600 square feet in area above ground, regardless of location, minimum fire-flow and flow duration requirements shall be as specified in Table B105.1(1).
>
> **Exception**: The fire code official is authorized to decrease the minimum required fire-flow and flow duration for one- and two-family dwellings, Group R-3 and R-4 buildings and townhouses protected by an approved automatic sprinkler system.

LLL. Table B105.1(1) is renamed Table B105.1(1). REQUIRED FIRE FLOW FOR ONE- AND TWO-FAMILY DWELLINGS, GROUP R-3 and R-4 BUILDINGS, AND TOWNHOMES GREATER THAN 3,600 SQUARE FEET ABOVE GROUND

MMM. Table B105.1(2) is renamed Table B105.1 AREA, FIRE FLOW AND DURATION

NNN. Section B105.2 – Buildings other than one-and two-family dwellings, Group R-3 and R-4 and townhouses, is amended to read as follows:

> The minimum fire-flow and flow duration for buildings other than one- and two-family dwellings, Group R-3 and R-4 buildings and townhouses shall be as specified in Tables B105.1(1) and B105.2.

OOO. Table B105.2 is amended to read as follows:

TABLE B105.2
REQUIRED FIRE FLOW FOR BUILDINGS OTHER THAN ONE- AND TWO-FAMILY DWELLINGS, GROUP R-3 AND R-4 BUILDINGS AND TOWNHOUSES

AUTOMATIC SPRINKLER SYSTEM (Design standard)	MINIMUM FIRE FLOW (gallons per minute)	FLOW DURATIONS (hours)
No automatic sprinkler system	Value in Table B105.1(2)	Duration in Table B105.1(2)
Section 903.1.1 of the International Fire Code	25% of the value in Table B105.1[a]	Duration in Table B105.1 at the reduced flow rate
Section 903.3.1.2 of the International Fire Code	25% of the value in Table B105.1[a]	Duration in Table B105.1 at the reduced flow rate

Table B105.2, Footnote a. is amended to read as follows:

a. The reduced fire flow shall be not less than 1,500 gallons per minute

Table B105.2, Footnote b. is deleted in its entirety.

PPP. Appendix C – Fire Hydrant Locations and Distributions - is adopted in its entirety with the following amendments:

QQQ. Section C101.1 – Scope - is amended to read as follows:

> In addition to the requirements of Section 507.5.1, fire hydrants shall be provided in accordance with this appendix for the protection of buildings, or portions of buildings, hereafter constructed or moved into the jurisdiction. The fire code official is authorized to modify the location, number and distribution of fire hydrants based on site-specific constraints and hazards.

RRR. Table C102.1 is amended by renaming it Table C102.1 REQUIRED NUMBER OF FIRE HYDRANTS, and by deleting columns AVERAGE SPACING BETWEEN HYDRANTS and MAXIMUM DISTANCE FROM ANY POINT ON STREET OR ROAD FRONTAGE TO A HYDRANT, and by deleting all footnotes.

SSS. Section C103 is amended with the creation of Table C103.1 REQUIRED SPACING OF HYDRANTS and associated footnotes:

TABLE C103.1
REQUIRED SPACING OF HYDRANTS

APPLICATION	SPACING BETWEEN HYDRANTS (feet) [a,b]	MAXIMUM DISTANCE FROM THE CLOSEST POINT ON A BUILDING TO A HYDRANT (feet)
Buildings other than one- and two-family dwellings, Group R-3 and R-4, and townhouses	350	400[c]
Urban One- and Two-Family Dwellings, Group R-3 and R-4, and townhouses	600	600
Rural One- and Two-Family Dwellings, Group R-3 and R-4, and townhouses	1,000	1,000

a. Where streets are provided with median dividers that cannot be crossed by fire fighters pulling hose lines, or are arterial streets, hydrant spacing shall average 350 feet on each side of the street and be arranged on an alternating basis.
b. Where new water mains are extended along streets where hydrants are not needed for protection of structures or similar fire problems, fire hydrants shall be provided at spacing not to exceed 1,000 feet to provide for transportation hazards.
c. For buildings equipped with a fire department connection, see Section 507.5.1.1.

TTT. The Exception within Section C103.2 is deleted in its entirety.

UUU. Section C103.3 – Spacing from hydrants to a building - is amended to read as follows:

> The maximum spacing from fire hydrants to a structure shall be in accordance with Table C103.1

VVV. Appendix D – Fire Apparatus Access Roads - is adopted in its entirety with the following amendments:

WWW. Section D102.1 – Access and loading - is amended to read as follows:

> Facilities, buildings or portions of buildings hereafter constructed shall be accessible to fire department apparatus by way of an approved fire apparatus access road capable of supporting the imposed load of fire apparatus weighing at least 82,000 pounds (37,194 kg).

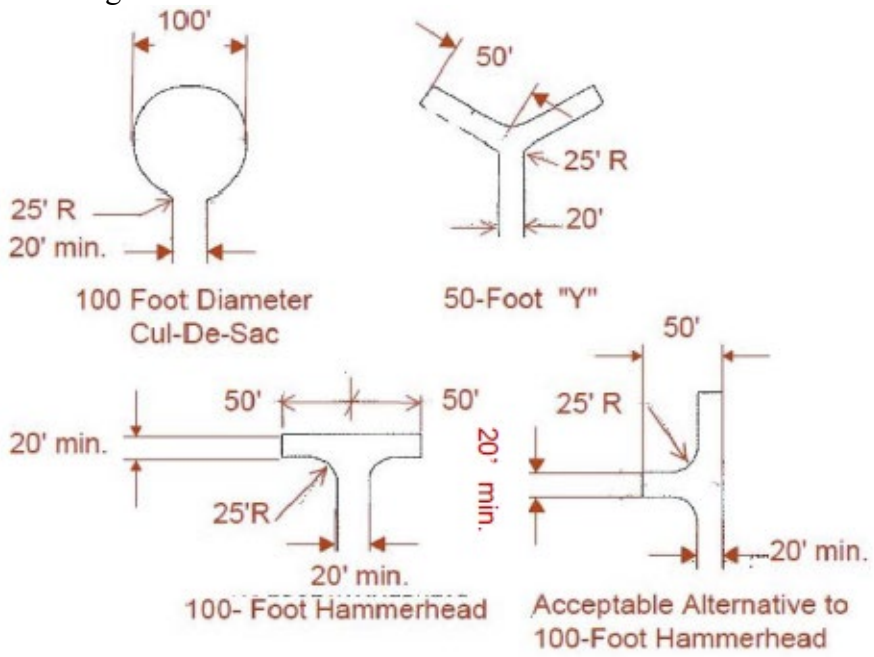
XXX. A new Section D102.2 – Roadway surface - is added and reads as follows:

> All fire apparatus access roadways shall be all-weather driving surfaces capable of supporting fire apparatus. Surfaces shall be asphalt or concrete and maintained in a usable condition at all times. Compacted road base or other all-weather surfaces engineered and capable of supporting the imposed loads may be approved for temporary use, outdoor vehicle storage, ground-mounted solar installations, cell towers and similar isolated facilities and structures when approved by the fire code official.

YYY. A new Section D102.2.1 – Access during construction - is added and reads as follows:

> Compacted road base, chip or other all-weather surfaces shall be used only for temporary emergency access. All required access roads must be installed and serviceable before aboveground construction begins. Temporary access shall be available as long as the site is under construction. Thereafter, permanent fire lanes confirming with D102.1 and D102.2 shall be accessible and unobstructed at all times.

ZZZ. Figure D103.1 – Dead-end fire apparatus roads - is deleted and replaced with the following:



AAAA. Section D103.3 – Turning radius - is amended to read as follows:

> The minimum turning radius shall be 25 feet inside radius and 50 feet outside radius, or as determined by agency apparatus design specifications.

BBBB. Table D103.4 – Requirements for dead-end fire apparatus access roads - is amended to read as follows:

TABLE D103.4
REQUIREMENTS FOR DEAD-END FIRE APPARATUS ACCESS ROADS

LENGTH (feet)	WIDTH (feet)	TURNAROUNDS REQUIRED
0-150	20	None required
151 and longer	20	Refer to Figure D103.1

CCCC. An exception is added to Section D103.5 and reads as follows:

> **Exception**: Private driveways serving one single-family residence, as approved by the fire code official.

DDDD. Section D103.6 – Signs - is amended to read as follows:

> Where required by the fire code official, fire apparatus access roads shall be marked with permanent "NO PARKING – FIRE LANE" signs complying with Diagram 1418 of the Larimer County Urban Area Street Standards, Chapter 2B of the Manual on Uniform Traffic Control Devices (2023), or as approved by the fire code official. Signs shall be posted on one or both sides of the fire apparatus road as required by Section D103.6.1 or D103.6.2.

EEEE. Section D103.7 – Bumpouts - and Figure 103.7 are created to read as follows:

> For new developments with rural roads longer than 1,000 feet, approved bumpouts (turnouts) shall be constructed at approximately every 660 feet of road. Greater distances may be allowed if needed to maintain safe sight distance. The bumpouts shall be designed in accordance with Figure D103.7, constructed to allow turning movements to be made by emergency vehicles, and be an all-weather road surface at least 8 feet wide and 30 feet in length.

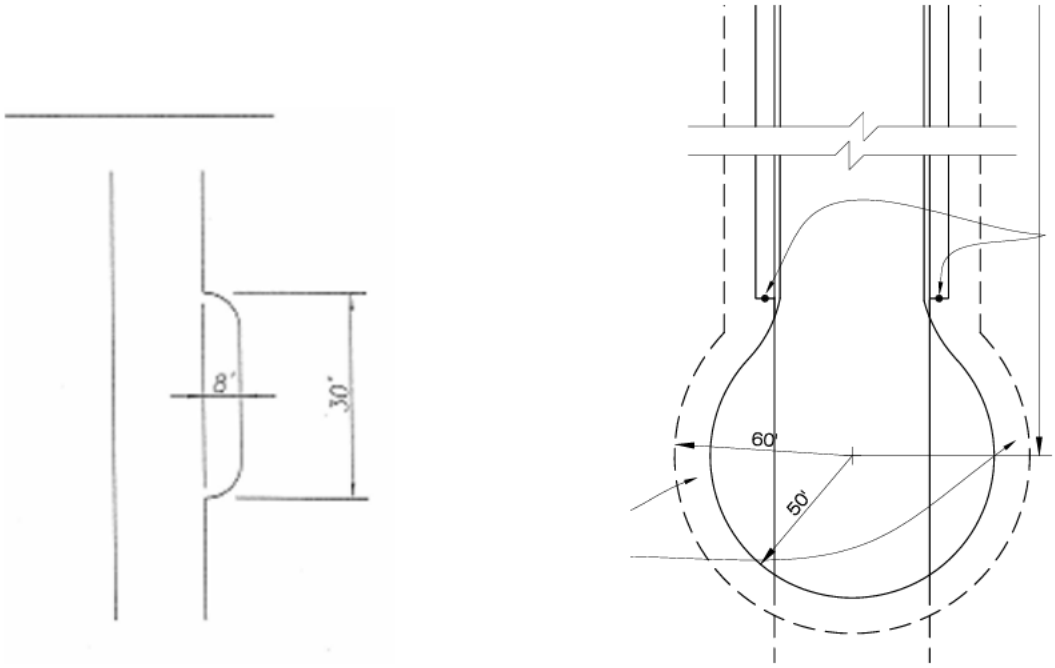


FIGURE D103.7 – BUMPOUT DESIGNS

FFFF. Section D104 – Commercial and industrial developments - is renamed Emergency vehicle access to all developments, and Section D104.1 – Multiple access roads - is amended to read as follows:

> A minimum of two approved fire-apparatus access roads shall be provided to each new residential development or new commercial or multi-family building within the jurisdiction. If multiple fire apparatus access roadways cannot be provided, all occupiable structures that are located more than 660 feet from the last roadway providing access from two directions, as measured from the centerline of this last roadway, shall be protected with an approved automatic fire sprinkler system.

GGGG. Section D104.2 – Minimum two access drives - is amended to read as follows:

> A minimum of two approved fire-apparatus access drives shall be provided to each building or portion of building hereafter constructed or moved into the jurisdiction. These drives are provided from the public or private roadway.
>
> **Exception:** A driveway to a one-family or two-family dwelling.

HHHH. Section D104.3 – Remoteness - is amended to read as follows:

> Where two fire apparatus access roads are required, they shall be placed a distance apart equal to not less than one half of the length of the maximum overall diagonal dimension of the lot or area to be served, measured in a straight line between accesses. If all structures are protected by an approved automatic fire-sprinkler system, the access

roadways may be placed a distance apart equal to not less than one-third the length of the maximum overall diagonal dimension of the property or area to be served, measured in a straight line.

Exception: One- and two-family dwellings.

IIII. Section D105.3 – Proximity to building - is amended to read as follows:

One or more of the required access routes meeting this condition shall be located not less than 15 feet and not greater than 30 feet from, and be positioned parallel to, one long side of the building. The side of the building on which the aerial fire apparats access road is positioned shall be approved by the fire code official.

JJJJ. Section D106.1 – Access to buildings - is amended to read as follows:

A minimum of two approved fire apparatus access roads shall be provided to each building or portion of building hereafter constructed or moved into the jurisdiction.

Exception: Projects of less than 100 dwelling units where all buildings, including nonresidential occupancies, are equipped throughout with approved automatic sprinkler systems installed in accordance with Section 903.3.1.1 or 903.3.1.2.

KKKK. Section D106.2 – Projects having 100 or more dwelling units - is amended to read as follows:

Multiple-family residential projects having 100 or more dwelling units shall be provided with at least two separate and approved fire apparatus access roads.

LLLL. Appendix E – Hazard Categories - is adopted in its entirety.

MMMM. Appendix F – Hazard Ranking - is adopted in its entirety.

NNNN. Appendix G – Cryogenic Fluids – Weight and Volume Equivalents - is adopted in its entirety.

OOOO. Appendix H – Hazardous Materials Management Plan (HMMP) and Hazardous Materials Inventory Statement (HMIS) is adopted in its entirety.

PPPP. Appendix I – Fire Protection Systems – Noncompliant Conditions - is adopted in its entirety.

QQQQ. Appendix O – Valet Trash and Recycling Collection in Group R-2 Occupancies - is adopted in its entirety, with one amendment to O101.1 - Scope:

Valet trash collection in Group R-2 occupancies shall comply with this appendix. Valet trash collection shall be allowed only in Group R-2 occupancies protected in accordance with Section 903.3.1.1 or Section 903.3.1.2 of this code.

15.28.030 - 2026 Loveland Fire Rescue Authority Wildfire Resiliency Code—Adopted.

The Loveland Fire Rescue Authority Wildfire Resiliency Code, 2026 Edition is hereby adopted. A copy of such wildfire resiliency code shall be on file in the office of the City Clerk and may be inspected during regular business hours.

Section 2. That if any section, subsection, or portion of this ordinance is, for any reason, held to be unconstitutional or invalid for any reason, such decision shall not affect the validity of the remaining portions of this ordinance. City Council hereby declares that it would have passed this ordinance, and each section, subsection, and portion hereof, regardless of whether any one or more sections, subsections, or portions may be declared unconstitutional or invalid.

Section 3. That nothing in this ordinance shall be construed to affect any suit or proceeding pending in any court, or any rights acquired, liability incurred, or cause of action acquired or existing under any ordinance hereby repealed, nor shall any legal right or remedy of any character be impaired by this ordinance.

Section 4. That the City Clerk shall cause to be published twice in a newspaper of general circulation within the City, once at least fifteen (15) days preceding the public hearing, and once at least eight (8) days preceding the public hearing, a notice in the following general form:

> Public notice is hereby given that at 6:00 p.m. on April, 21, 2026, in the City Council Chambers, City Hall, 500 East Third Street, Loveland, Colorado, the Loveland City Council will consider on second reading an Ordinance Repealing and Reenacting Chapter 15.28 and Adopting by Reference the International Fire Code, 2024 Edition and Adopting by Reference the Loveland Fire Rescue Authority Wildfire Resiliency Code, 206 Edition. A public hearing shall be held prior to said consideration. Copies of the above-referenced International Fire Code, 2024 Edition and any codes adopted by reference within the code are on file with the Loveland City Clerk and are open to public inspection.

Section 5. That as provided in City Charter Section 4-9(a)(7), this Ordinance shall be published by title only by the City Clerk after adoption on second reading unless the Ordinance has been amended since first reading in which case the Ordinance shall be published in full, or the amendments shall be published in full. This Ordinance shall be in full force and effect ten days after its final publication, as provided in City Charter Section 4-8(b).

ADOPTED this _____ day of April, 2026.

CITY OF LOVELAND, COLORADO:

Patrick McFall, Mayor

ATTEST:

Ashley Macdonald, City Clerk

APPROVED AS TO FORM:



Assistant City Attorney

AN ORDINANCE REPEALING AND REENACTING CHAPTER 15.28 OF THE LOVELAND MUNICIPAL CODE AND ADOPTING BY REFERENCE THE LOVELAND FIRE RESCUE AUTHORITY WILDFIRE RESILIENCY CODE, 2026 EDITION

EXHIBIT A

2026
Loveland Fire Rescue Authority Wildfire Resiliency Code

Adopted DATE
Enforced DATE

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History of the 2026 Loveland Fire Rescue Authority Wildfire Resiliency Code

In 2022, Loveland Fire Rescue Authority (LFRA) stood up a 25-member committee to consider measures to reduce the risk of wildfire danger in the LFRA jurisdiction. The committee represented a diverse group of professionals, representing the fire service, community development, builders and real estate, as well as City of Loveland and Larimer County employees. What came about was the creation and adoption of Appendix O – Wildfire Risk Reduction, adopted in 2023 as part of the 2021 International Fire Code. The LFRA code applied to new construction in the area designated as the Wildland Urban Interface (WUI), based on mapping and data from the 2023 Community Wildfire Protection Plan. This new code, which went into effect July 1, 2023, focused on reducing risk based on construction hardening, landscaping and fencing. In 2023, Colorado SB23-166 created a Wildfire Resiliency Code Board (WRCB) tasked with creating a statewide wildfire resiliency code. The 21 members, appointed by legislators, were from the fire service, insurance industry, forest service, municipal government, community development, architecture profession and wildfire consulting firms. The state Wildfire Resiliency Code (WRC) was completed in May 2025 and adopted by the WRCB on July 1, 2025. Like the LFRA code, the statewide code seeks to reduce the risk of wildfire through construction hardening, and site and area design.

This 2025 Loveland Fire Rescue Authority Wildfire Resiliency Code combines the requirements of Appendix O and the Colorado WRC, to create wildfire reduction measures at least as stringent as the WRC, as is allowed by law.

Attributions

ATTRIBUTIONS

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Chapter 1 - Scope and Administration

PART 1 GENERAL PROVISIONS

SECTION 101 SCOPE AND GENERAL REQUIREMENTS

101.1 Title. These regulations shall be known as the Loveland Fire Rescue Authority (LFRA) Wildfire Resiliency Code as adopted by the Loveland Fire Rescue Authority and City of Loveland, hereinafter referred to as "this code."

101.1.1 Application of wildfire codes. This code is adopted and enforceable within those portions of LFRA's jurisdiction that lie within the City of Loveland. Those portions of LFRA's jurisdiction that lie within the Town of Johnstown and Larimer County are governed by separate wildfire resiliency codes adopted by the Town Council and the Board of County Commissioners, as applicable.

101.2 Scope. The provisions of this code shall apply to the construction, alteration, movement, repair, maintenance and use of any building, structure or premises that contain *occupiable* and/or *habitable space*, or change in use resulting in an occupiable and/or habitable space, unless excepted, within the *wildland-urban interface* areas of Colorado, as designated in this code. Buildings or conditions in existence at the time of the adoption of this code are allowed to have their use or occupancy continued, if such condition, use or occupancy was legal at the time of the adoption of this code, provided that such continued use does not constitute a distinct danger to life or property.

Buildings or structures moved into or within the jurisdiction shall comply with the provisions of this code for new buildings or structures.

101.2.1 Appendices. Provisions in the appendices shall not apply unless specifically adopted.

101.2.2 Factory-built structures (nonresidential, residential, and tiny homes). Structure hardening provisions of this code for factory-built structures as defined by sections 24-32-3302(9), (10), (11), and (35), C.R.S., are in accordance with Rules adopted by the Division of Housing in 8 CCR 1302-1, Rule 2 Codes and Standards.

101.2.3 HUD code homes. Homes built to the Housing and Urban Development (HUD) Manufactured Home Construction and Safety Standards are exempt from structure hardening requirements on their first installation. Homes built to the HUD Manufactured Home Construction and Safety Standards which are moved into an applicable Wildfire Resiliency code area are subject to the provisions of this code as required by the authority having jurisdiction.

101.3 Purpose. The purpose of this code is to establish minimum regulations for the safeguarding of life and for property protection. Regulations in this code are intended to mitigate the risk to life and structures from intrusion of fire from wildland fire exposures and fire exposures from adjacent

structures and to mitigate structure fires from spreading to wildland fuels.

The unrestricted use of property in *wildland-urban interface* areas is a potential threat to life and property from fire and resulting erosion. Safeguards to prevent the occurrence of fires and to provide adequate fire protection facilities to control the spread of fire in *wildland-urban interface* areas shall be in accordance with this code.

This code shall supplement the jurisdiction's building and fire codes, if such codes have been adopted, to provide for special regulations to mitigate the fire- and life-safety hazards of the *wildland-urban interface* areas.

101.4 Retroactivity. The provisions of the code shall apply to conditions arising after the adoption thereof, conditions not legally in existence at the adoption of this code and conditions that, in the opinion of the *code official*, constitute a distinct hazard to life or property.

> **Exception:** Provisions of this code that specifically apply to existing conditions are retroactive.

101.5 Additions or alterations. Additions or alterations shall be permitted to be made to any building or structure without requiring the existing building or structure to comply with all of the requirements of this code, provided that, when the work increases the footprint of the existing structure by 500 square feet or greater, the addition or alteration conforms to that required for a new building or structure.

> **Exception:** Provisions of this code that specifically apply to existing conditions are retroactive.

Additions or alterations shall not be made to an existing building or structure that will cause the existing building or structure to be in violation of any of the provisions of this code nor shall such additions or alterations cause the existing building or structure to become unsafe. An unsafe condition shall be deemed to have been created if an addition or alteration will cause the existing building or structure to become structurally unsafe or overloaded; will not provide adequate access in compliance with the provisions of this code or will obstruct existing exits or access; will create a fire hazard; will reduce required fire resistance or will otherwise create conditions dangerous to human life.

101.6 Roof coverings. The *roof covering* on buildings or structures in existence prior to adoption of this code that are replaced or have 25 percent or more of the surface area of the roof replaced, or where work to reconstruct, alter, or repair the *roof covering* effectively replaces such material, shall require the entirety of the *roof covering* to be replaced with a *roof covering* required for new construction specified in Sections 403.2 through 403.2.2.

> **Exception:** Existing *roof coverings* that are compliant with Section 403.2.

101.7 Exterior walls. The exterior walls of building or structures in existence prior to adoption of this code where 25 percent or more of the total exterior wall surface area is replaced, or where work to reconstruct, alter or repair the exterior walls effectively replaces the exterior wall material, shall require the entirety of the exterior wall surface area, including attachments, to be replaced with materials required for new construction specified in Section 403.6 through 403.6.2

and the Immediate Zone within 5 feet of the structure shall be made to comply with Section 501.3.

Exception: Existing exterior walls that are compliant with Section 404.3.

101.8 Maintenance. Buildings, structures, landscape materials, vegetation, *defensible space* or other devices or safeguards required by this code shall be maintained in conformance to the code edition under which installed. The owner or the owner's authorized agent shall be responsible for the maintenance of buildings, structures, landscape materials and vegetation.

SECTION 102 APPLICABILITY

102.1 General. Where there is a conflict between a general requirement and a specific requirement, the specific requirement shall govern. Where, in any specific case, different sections of this code, or any other adopted code, specify different materials, methods of construction or other requirements, the most restrictive shall govern.

102.2 Other laws. The provisions of this code shall not be deemed to nullify any provisions of local, state or federal law.

102.3 Application of references. References to chapter or section numbers, or to provisions not specifically identified by number, shall be construed to refer to such chapter, section or provision of this code.

102.4 Referenced codes and standards. The codes and standards referenced in this code are listed throughout this code. Such codes and standards shall be considered as part of the requirements of this code to the prescribed extent of each such reference and as further regulated in Sections 102.4.1 and 102.4.2.

102.4.1 Conflicts. Where conflicts occur between provisions of this code and the referenced codes and standards, the provisions of this code shall govern.

102.4.2 Provisions in referenced codes and standards. Where the extent of the reference to a referenced code or standard includes subject matter that is within the scope of this code, the provisions of this code, as applicable, shall take precedence over the provisions in the referenced standard.

102.5 Subjects not regulated by this code. Where applicable standards or requirements are not set forth in this code, or are contained within other laws, codes, regulations, ordinances or policies adopted by the authority having jurisdiction, compliance with applicable standards of other nationally recognized safety standards, as *approved*, shall be deemed as prima facie evidence of compliance with the intent of this code. Nothing herein shall derogate from the authority of the *code official* to determine compliance with codes or standards for those activities or installations within the code official's jurisdiction or responsibility.

102.6 Matters not provided for. Requirements that are essential for the public safety of an existing or proposed activity, building or structure, or for the safety of the occupants thereof,

which are not specifically provided for by this code, shall be determined by the *code official* consistent with the necessity to establish the minimum requirements to safeguard the public health, safety and general welfare.

102.7 Partial invalidity. In the event that any part or provision of this code is held to be illegal or void, this shall not have the effect of making void or illegal any of the other parts or provisions.

102.8 Existing conditions. The legal occupancy or use of any structure or condition existing on the date of adoption of this code shall be permitted to continue without change, except as is specifically covered in this code, the *International Fire Code* or the *International Property Maintenance Code*, or as is deemed necessary by the *code official* for the general safety and welfare of the occupants and the public.

102.9 Historic structures. A variance is authorized to be issued for the repair or rehabilitation of a historic structure or construction of a contributing structure upon a determination that the proposed repair or rehabilitation will not preclude the structure's continued designation as a historic structure, and the variance is the minimum necessary to preserve the historic character and design of the structure, within the spirit of this code.

Exception: Within wildfire hazard areas, historic structures that do not meet one or more of the following designations:

1. Listed or preliminarily determined to be eligible for listing in the National Register of Historic Places.
2. Determined as contributing to the historical significance of a registered historic district or a district preliminarily determined to qualify as a historic district.
3. Designated as historic under a state or local historic preservation program.

102.9.1 Historic preservation exemption. The authority having jurisdiction may establish a historic preservation exemption or exemptions in their jurisdiction that consists of the spirit and intent of this code.

102.10 Work exempt from permit under this code. Exemptions from code requirements shall not be deemed to grant authorization for any work to be done in any manner in violation of the provisions of this code or any other laws or ordinances of the jurisdiction. Compliance with this code shall not be required for the following:

1. Interior alterations of existing structures.
2. Additions that do not increase the footprint of a structure by more than 500 square feet.
3. The reconstruction, replacement, alteration, or repair of the exterior walls of an existing building, when less than 25 percent of the surface area of all exterior walls is affected.
4. The reconstruction, replacement, alteration, or repair of the exterior *roof covering* of an existing building, when less than 25 percent of the surface area of the exterior *roof covering* or an attachment thereto is affected.

5. Alterations or repairs to the exterior of an existing structure, or an attachment to it, when less than 25 percent of the exterior of the structure is affected by the alteration or repair.
6. Painting, staining and similar maintenance or restorative work.
7. One-story detached accessory, nonhabitable structures, such as tool and storage sheds, playhouses and similar uses, provided that the floor area does not exceed 120 square feet and the structure is located greater than or equal to 10 feet from the nearest adjacent occupiable structure.
8. *Accessory structures* and buildings of an accessory character classified as Utility and Miscellaneous Group U (including Agricultural Structures) located more than 50 feet from a structure containing *occupiable* or *habitable space*.
9. Fences located more than 8 feet from a habitable structure.
10. Any 35-acre parcel with only one residential structure on it that does not abut a residential or commercial area.

PART 2 ADMINISTRATION AND ENFORCEMENT SECTION

103 CODE COMPLIANCE AGENCY

103.1 Creation of agency. The Loveland Fire Rescue Authority is hereby designated to enforce the code and the official in charge thereof shall be known as the *code official*. The function of the agency shall be the implementation, administration and enforcement of the provisions of this code.

103.2 Appointment. The *code official* shall be appointed by the chief appointing authority of the jurisdiction.

103.3 Deputies. In accordance with the prescribed procedures of this jurisdiction and with the concurrence of the appointing authority, the *code official* shall have the authority to appoint a deputy *code official*, other related technical officers, inspectors and other employees. Such employees shall have powers as delegated by the *code official*.

SECTION 104 DUTIES AND POWERS OF THE CODE OFFICIAL

104.1 Powers and duties of the code official. The *code official* is hereby authorized to enforce the provisions of this code.

104.2 Determination of compliance. The *code official* shall have the authority to determine compliance with this code, to render interpretations of this code and to adopt policies and procedures in order to clarify the application of its provisions. Such interpretations, policies and procedures:

1. Shall be in compliance with the intent and purpose of this code.
2. Shall not have the effect of waiving requirements specifically provided for in this code.

104.2.1 Technical assistance. To determine compliance with this code, the *code official* is authorized to require the owner, the owner's authorized agent or the person in possession or control of the building or premises to provide a technical opinion and report.

104.2.1.1 Costs. A technical opinion and report shall be provided without charge to the jurisdiction.

104.2.1.2 Preparer qualifications. The technical opinion and report shall be prepared by a qualified engineer, specialist, laboratory or fire safety specialty organization acceptable to the *code official*. The *code official* is authorized to require design submittals to be prepared by, and bear the stamp of, a registered design professional.

104.2.1.3 Content. The technical opinion and report shall analyze the properties of the design, operation or use of the building or premises, the facilities and appurtenances situated thereon and fuel management to identify and propose necessary recommendations.

104.2.1.4 Tests. Where there is insufficient evidence of compliance with the provisions of this code, the *code official* shall have the authority to require tests as evidence of compliance. Test methods shall be as specified in this code or by other recognized test standards. In the absence of recognized test standards, the *code official* shall approve the testing procedures. Such tests shall be performed by a party acceptable to the *code official*.

104.2.2 Alternative materials, design and methods. The provisions of this code are not intended to prevent the installation of any material or to prohibit any design or method of construction not specifically prescribed by this code, provided that any such alternative has been *approved*.

104.2.2.1 Approval authority. An alternative material, design or method shall be *approved* where the *code official* finds that the proposed alternative is satisfactory and complies with Sections 104.2.2.2 through 104.2.2.7, as applicable.

104.2.2.2 Application and disposition. Where required, a request to use an alternative material, design or method of construction shall be submitted in writing to the *code official* for approval. Where the alternative material, design or method of construction is not approved, the *code official* shall respond in writing, stating the reasons the alternative was not approved.

104.2.2.3 Compliance with code intent. An alternative material, design or method of construction shall comply with the intent of the provisions of this code.

104.2.2.4 Equivalency criteria. An alternative material, design or method of construction shall, for the purpose intended, be not less than the equivalent of that prescribed in this code with respect to all of the following, as applicable:

1. Quality.
2. Strength.
3. Effectiveness.
4. Durability.
5. Safety, other than fire safety.
6. Fire safety.

104.2.2.5 Tests. Tests conducted to demonstrate equivalency in support of an alternative material, design or method of construction application shall be of a scale that is sufficient to predict performance of the end use configuration. Tests shall be performed by a party acceptable to the *code official.*

104.2.2.5.1 Fire tests. Tests conducted to demonstrate equivalent fire safety in support of an alternative material, design or method of construction application shall be of a scale that is sufficient to predict fire safety performance of the end use configuration. Tests shall be performed by a party acceptable to the *code official*.

104.2.2.6 Reports. Supporting data, where necessary to assist in the approval of materials or assemblies not specifically provided for in this code, shall comply with Sections 104.2.2.6.1 and 104.2.2.6.2.

104.2.2.6.1 Evaluation reports. Evaluation reports shall be issued by an *approved* agency and use of the evaluation report shall require approval by the *code official* for the installation. The alternate material, design or method of construction and product evaluated shall be within the scope of the *code official*'s recognition of the *approved* agency. Criteria used for the evaluation shall be identified within the report and, where required, provided to the *code official*.

104.2.2.6.2 Other reports. Reports not complying with Section 104.2.2.6.1 shall describe criteria, including but not limited to any referenced testing or analysis, used to determine compliance with code intent and justify code equivalence. The report shall be prepared by a qualified engineer, specialist, laboratory or fire safety specialty organization acceptable to the *code official*. The *code official* is authorized to require design submittals to be prepared by, and bear the stamp of, a registered design professional.

104.2.2.7 Peer review. The *code official* is authorized to require submittal of a peer review report in conjunction with a request to use an alternative material, design or

method of construction, prepared by a peer reviewer that is *approved* by the *code official*.

104.2.3 Modifications. Where there are practical difficulties involved in carrying out the provisions of this code, the *code official* shall have the authority to grant modifications for individual cases, provided that the *code official* shall first find that one or more special individual reasons make the strict letter of this code impractical, that the modification is in conformance with the intent and purpose of this code, and that such modification does not lessen health, life and fire safety requirements. The details of the written request and action granting modifications shall be recorded and entered into the files of the code enforcement agency.

104.3 Applications and permits. The *code official* is authorized to receive applications, review construction documents and issue permits for construction regulated by this code, issue permits for operations regulated by this code, inspect the premises for which such permits have been issued and enforce compliance with the provisions of this code. Permitting shall comply with Section 105 of the 2024 International Fire Code as locally adopted.

104.4 Access to Property. For the purpose of inspecting and enforcing the provisions of this code and the terms and conditions of any permit issued under this code, the *code official* is authorized to enter upon private property at reasonable times and upon reasonable notice for the purpose of determining compliance with this code and to evaluate conditions relative to the permit application.

104.4.1 Authorization. The owner or occupant of the property having a permit under this code shall allow the *code official* access to the property to perform the required inspections. If access is denied, the *code official* shall apply to the Court with jurisdiction to seek authority to access the property.

104.5 Identification. The *code official* shall carry proper identification when inspecting structures or premises in the performance of duties under this code.

104.6 Notices and orders. The *code official* shall issue all necessary notices or orders to ensure compliance with this code.

104.7 Official records. The *code official* shall keep official records as required by Sections 104.7.1 through 104.7.5. Such official records shall be retained for not less than 5 years or for as long as the structure or activity to which such records relate remains in existence, unless otherwise provided by other regulations.

104.7.1 Approvals. A record of approvals shall be maintained by the *code official* and shall be available for public inspection during business hours in accordance with applicable laws.

104.7.2 Inspections. The *code official* shall keep a record of each inspection made, including notices and orders issued, showing the findings and disposition of each.

104.7.3 Code alternatives and modifications. Application for alternative materials, design and methods of construction and equipment in accordance with Section 104.2.2; modifications in accordance with Section 104.2.3; and documentation of the final decision of the *code official* for either shall be in writing and shall be retained in the official records.

104.7.4 Tests. The *code official* shall keep a record of tests conducted to comply with Sections 104.2.1.4 and 104.2.2.5.

104.7.5 Fees. The *code official* shall keep a record of fees collected and refunded in accordance with Section 106.

104.8 Liability. The *code official*, member of the board of appeals or employee charged with the enforcement of this code, while acting for the jurisdiction, in good faith and without malice in the discharge of the duties required by this code or other pertinent law or ordinance, shall not thereby be rendered personally liable, either civilly or criminally, and is hereby relieved from all personal liability for any damage accruing to persons or property as a result of an act or by reason of any act or omission in the discharge of official duties.

104.8.1 Legal defense. Any suit or criminal complaint instituted against any officer or employee because of an act performed by that officer or employee in the lawful discharge of duties and under the provisions of this code or other laws or ordinances implemented through the enforcement of this code shall be defended by legal representatives of the jurisdiction until final termination of the proceedings. The *code official* or any subordinate shall not be liable for costs in an action, suit or proceeding that is instituted in pursuance of the provisions of this code.

104.9 Approved materials and equipment. Materials, equipment and devices approved by the *code official* shall be constructed and installed in accordance with such approval.

104.9.1 Materials and equipment reuse. Materials, equipment and devices shall not be reused unless such elements are in good working order and *approved*.

104.10 Other agencies. When requested to do so by the *code official*, other officials of this jurisdiction shall assist and cooperate with the *code official* in the discharge of the duties required by this code.

SECTION 105 TEMPORARY USES, EQUIPMENT AND SYSTEMS

105.1 General. The *code official* is authorized to issue a permit for temporary uses, equipment and systems. Such permits shall be limited as to time of service, but shall not be permitted for more than 180 days. The *code official* is authorized to grant extensions for demonstrated cause.

105.2 Conformance. Temporary uses, equipment and systems shall conform to the requirements of this code as necessary to ensure health, safety and general welfare.

105.3 Temporary service utilities. The *code official* is authorized to give permission to temporarily supply service utilities.

105.4 Termination of approval. The *code official* is authorized to terminate such permit for temporary uses, equipment and systems and to order the same to be discontinued.

SECTION 106 FEES

106.1 General. LFRA has the authority to impose fees for permit plan review and inspections, according to the Consolidated Fee Schedule. A permit shall not be issued until full payment has been received by LFRA.

SECTION 107 STOP WORK ORDER

107.1 Authority. Where the *code official* finds any work regulated by this code being performed in a manner contrary to the provisions of this code or in a dangerous or unsafe manner, the *code official* is authorized to issue a stop work order.

107.2 Issuance. The stop work order shall be in writing and shall be given to the owner of the property, the owner's authorized agent or the person performing the work. Upon issuance of a stop work order, the cited work shall immediately cease. The stop work order shall state the reason for the order and the conditions under which the cited work is authorized to resume.

107.3 Emergencies. Where an emergency exists, the *code official* shall not be required to give a written notice prior to stopping the work.

107.4 Failure to comply. Any person who shall continue any work after having been served with a stop work order, except such work as that person is directed to perform to remove a violation or unsafe condition, shall be subject to fines established by the authority having jurisdiction.

Chapter 2 - Definitions

SECTION 201 GENERAL

201.1 Scope. Unless otherwise expressly stated, the following words and terms shall, for the purposes of this code, have the meanings shown in this chapter.

201.2 Interchangeability. Words stated in the present tense include the future; words stated in the masculine gender include the feminine and neuter; and the singular number includes the plural and the plural the singular.

201.3 Terms defined in other codes. Where terms are not defined in this code and are defined in other International Codes, such terms shall have the meanings ascribed to them as in those codes.

201.4 Terms not defined. Where terms are not defined through the methods authorized by this section, such terms shall have their ordinarily accepted meanings such as the context implies.

SECTION 202 DEFINITIONS

ACCESSORY STRUCTURE. A building or structure used to shelter or support any material, equipment, chattel or occupancy other than a habitable building.

AGRICULTURAL BUILDING. A structure designed and constructed to house farm implements, hay, grain, poultry, livestock or other horticultural products. This structure shall not be a place of human habitation or a place of employment where agricultural products are processed, treated or packaged, nor shall it be a place used by the public.

APPROVED. Acceptable to the *code official*.

AUTHORITY HAVING JURISDICTION (AHJ). An organization, office or individual responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, installations or processes.

BUILDING. Any structure intended for supporting or sheltering any occupancy.

CLASS A TESTS. Class A Tests are applicable to *roof coverings* that are expected to be effective against severe fire exposure, afford a high degree of fire protection to the *roof deck*, do not slip from position, and are not expected to present a flying brand hazard.

COMMUNITY WILDFIRE PROTECTION PLAN (CWPP). A collaborative plan developed by a community in an effort to reduce wildfire risk. The plan identifies and prioritizes areas for hazardous fuel reduction treatments to protect communities and essential infrastructure, and procedures to reduce structural ignitability.

CODE OFFICIAL. The official designated by the jurisdiction to interpret and enforce this code, or the *code official*'s authorized representative.

DEFENSIBLE SPACE. An area either natural or man-made, where material capable of allowing a fire to spread unchecked has been treated, cleared or modified to slow the rate and intensity of an advancing wildfire and to create an area for fire suppression operations to occur.

EMBELLISHMENTS. Elements incorporated in design and construction for ornamental or decorative purpose that are not integral to the structure or structural support.

FIRE-RESISTANCE-RATED CONSTRUCTION. The use of materials and systems in the design and construction of a building or structure to safeguard against the spread of fire within a building or structure and the spread of fire to or from buildings or structures to the *wildland-urban interface* area.

FIRE-RETARDANT-TREATED WOOD. Any wood product that, when impregnated with chemicals by a pressure process or other means during manufacture, shall have, when tested in accordance with ASTM E84 or UL 723, a listed *flame spread index* of 25 or less. The ASTM E84 or UL723 test shall be continued for an additional 20-minute period and the flame front shall not progress more than 10.5 feet beyond the centerline of the burners at any time during the test.

FLAME SPREAD INDEX. A comparative measure, expressed as a dimensionless number, derived from visual measurements of the spread of flame versus time for a material tested in accordance with ASTM E84.

FUEL MODIFICATION. A method of modifying fuel load by reducing the amount of nonfire-resistive vegetation or altering the type of vegetation to reduce the fuel load.

HABITABLE SPACE. A space in a building for living, sleeping, eating or cooking.

HEAVY TIMBER CONSTRUCTION. As described in Section 602.4 of the 2024 *International Building Code.*

HOME IGNITION ZONE. The home and the area around the home (or structure). The HIZ takes into account both the potential of the structure to ignite and the quality of *defensible space* surrounding it.

IGNITION-RESISTANT BUILDING MATERIAL. A type of building material that resists ignition or sustained flaming combustion sufficiently so as to reduce losses from wildfire exposure of burning embers and small flames.

IGNITION-RESISTANT VEGETATION. Plants that are less likely to readily ignite from a flame or other ignition source and produce fewer embers. While they can still be damaged by fire, their foliage and stems do not significantly contribute to the intensity of the fire.

LOG WALL CONSTRUCTION. A type of construction in which exterior walls are constructed

of solid wood members and where the smallest horizontal dimension of each solid wood member is not less than 6 inches. Log wall construction shall follow requirements of the 2022 ICC 400 Standard on the Design and Construction of Log Structures.

MULTILAYERED GLAZED PANELS. Window or door assemblies that consist of two or more independently glazed panels installed parallel to each other, having a sealed air gap in between, within a frame designed to fill completely the window or door opening in which the assembly is intended to be installed.

NONCOMBUSTIBLE. As applied to building construction material means a material that, in the form in which it is used, is either one of the following:

1. Material of which no part will ignite and burn when subjected to fire.

2. Any material conforming to ASTM E136 shall be considered noncombustible within the meaning of this section.

3. For the purposes of this code, fire-rated gypsum board tested in accordance with ASTM C1396 with no less than a 1-hour fire-resistance-rating with fire exposure from the outside only is considered a noncombustible material.

OCCUPIABLE SPACE. A room or enclosed space designed for human occupancy in which individuals congregate for amusement, education or similar purposes or in which occupants are engaged at labor.

ROOF ASSEMBLY. A system designed to provide weather protection and resistance to design loads. The system consists of a *roof covering* and *roof deck* or a single component serving as both the *roof covering* and the *roof deck*. A *roof assembly* can include an underlayment, thermal barrier, ignition barrier, insulation or a vapor retarder.

ROOF COVERING. The covering applied to the *roof deck* for weather resistance, fire classification or appearance.

ROOF DECK. The flat or sloped surface not including its supporting members or vertical supports.

SLOPE. The variation of terrain from the horizontal; the number of feet rise or fall per 100 feet measured horizontally, expressed as a percentage.

STRUCTURE. That which is built or constructed.

STRUCTURE IGNITION ZONE. Structure Ignition Zone is the structure and the area around the structure (or home). The SIZ takes into account both the potential of the structure to ignite and the quality of *defensible space* surrounding it.

TREE CROWN. The primary and secondary branches growing out from the main stem, together with twigs and foliage.

WILDLAND-URBAN INTERFACE. That geographical area where structures and other human development meet or intermingle with wildland or vegetative fuels.

Chapter 3 - Wildfire Hazard Identification

SECTION 301 GENERAL

301.1 Scope. The provisions of this chapter provide methodology to establish and record wildfire hazard based on the findings of fact to be regulated by this code.

301.2 Objective. The objective of this chapter is to provide simple baseline criteria for determining *wildland-urban interface* areas based on the wildfire hazard.

SECTION 302 WILDLAND-URBAN INTERFACE AREA DESIGNATIONS

302.1 Declaration. The AHJ shall declare the *wildland-urban interface* areas within the jurisdiction as defined by this code. The *wildland-urban interface* areas shall be based on findings of fact.

SECTION 303 MAPPING AND APPLICABILITY

303.1 Mapping of wildfire hazard areas. Wildfire hazard areas shall be recorded on official maps. These maps identify areas subject to the provisions of this code and shall be available for public inspection through an accessible online platform and at designated local government offices.

303.1.1 Map. These maps shall be based on a combination of factors including, but not limited to, vegetative fuels, topography, local weather patterns, fire behavior modeling data, historic fires, firefighting vehicle access and evacuation routes.

303.1.2 Locally developed mapping. The AHJ may develop and adopt local maps designating wildfire hazard and *fire intensity classifications* within its jurisdictional boundaries in accordance with Sections 303.1 through 303.4.

303.2 LFRA wildfire hazard area. LFRA utilizes data from the 2023 CWPP and the Colorado Wildfire Resiliency Code (WRC) to designate wildfire hazard areas. Generally, the wildfire hazard area is located west of Wilson Avenue, and west of Taft Avenue north of West 57th Street in Loveland, Colo.

303.3 Additional hazard areas. In addition to the hazard area described in 303.2, there are several areas identified as wildfire risk areas based on the 2025 Colorado Wildfire Resiliency Code State Map, which can be found here:
https://experience.arcgis.com/experience/34c113129c044004bc672ca5493378de

303.4 Applicable requirements. Properties determined by the code official to be in a wildfire hazard area shall meet all applicable requirements of this code.

SECTION 304 GROUND-TRUTHING

304.1 Purpose. This section establishes a process for owners or the owners' authorized representative to request a ground-truthing review of their property's Wildfire Hazard or *fire intensity classification* as identified on state or locally adopted maps. The intent is to provide an opportunity to verify that mapping accurately reflects current, site-specific conditions.

304.2 Determination of wildfire hazard and code requirements. As determined by the *code official*, the wildfire hazard area and associated requirements shall be based on a review of the vegetative fuels on the parcel and within 300 feet of the parcel boundary, criteria as described in the LFRA CWPP, including but not limited to topography, local weather patterns and fire behavior modeling data.

304.2.1 Code official determination. The wildfire hazard determination shall be made based on existing conditions or conditions that have been established by a development plan approved by the local jurisdiction. Technical documentation shall be submitted in support of such request by a qualified wildfire professional and in accordance with Section 104.2.

304.2.2 Responsibility. Prior to property development, the property owner(s) or owners' authorized representative shall be responsible for submitting the request to the fire code official for review and determination of wildfire hazard area.

Chapter 4 - Structure Hardening

SECTION 401 GENERAL

401.1 Scope. Exterior design and construction of new buildings and structures within the *wildland-urban interface* areas of Colorado shall be constructed in accordance with this chapter.

Exceptions:

1. Buildings of an accessory character classified as Group U occupancy (including *agricultural buildings*) of any size located at least 50 feet from a structure containing *occupiable* or *habitable space*.
2. One-story detached accessory, nonhabitable structures, such as tool and storage sheds, playhouses and similar uses, provided that the floor area does not exceed 120 square feet and the structure is located greater than or equal to 10 feet from the nearest adjacent occupiable structure.
3. The reconstruction, replacement, alteration, or repair of the exterior walls of an existing building, when less than 25 percent of the surface area of all exterior walls is affected.
4. The reconstruction, replacement, alteration, or repair of the exterior *roof covering* of an existing building, when less than 25 percent of the surface area of the exterior *roof covering* or an attachment thereto is affected.
5. Alterations or repairs to the exterior of an existing structure, or an attachment to it, when less than twenty-five percent of the exterior of the structure is affected by the alteration or repair.
6. Additions that do not increase the footprint of a structure by more than 500 square feet.

SECTION 402 BUILDING MATERIAL

402.1 Building material. Building materials shall comply with any one of the requirements in Section 402.2 through 402.4.

402.2 Noncombustible material. *Noncombustible* material shall comply with the definition of *noncombustible* materials in Section 202.

402.3 Fire-retardant-treated wood. *Fire-retardant-treated wood* shall be identified for exterior use and shall meet the requirements of Section 2303.2 of the 2024 *International Building Code*.

402.4 Ignition-resistant building material. Material shall be tested on the front and back faces in accordance with the extended ASTM E84 or UL 723 test, for a total test period of 30 minutes, or with the ASTM E2768 test. The materials shall bear identification showing the fire test results. Panel products shall be tested with a ripped or cut longitudinal gap of 1/8 inch. The materials, when tested in accordance with the test procedures set forth in ASTM E84 or UL 723

for a test period of 30 minutes, or with ASTM E2768, shall comply with Sections 402.4.1 through 402.4.3.3. Materials or products which melt, drip or delaminate to the extent that the flame front is interrupted are not permitted.

Exception: Materials composed of a combustible core and a noncombustible exterior covering made from either aluminum at a minimum 0.019 inch thickness or corrosion-resistant steel at a minimum 0.0149 inch thickness shall not be required to be tested with a ripped or cut longitudinal gap.

402.4.1 Flame spread. The material shall exhibit a *flame spread index* not exceeding 25.

402.4.2 Flame front. The material shall exhibit a flame front that does not progress more than 10 feet 6 inches beyond the centerline of the burner at any time during the test.

402.4.3 Weathering. *Ignition-resistant building materials* shall maintain their performance in accordance with this section under conditions of use. The materials shall meet the performance requirements for weathering (including exposure to temperature, moisture and ultraviolet radiation) contained in Sections 402.4.3.1 through 402.4.3.3, as applicable to the materials and conditions of use.

402.4.3.1 Evaluation requirements for weathering. Fire-retardant-treated wood, wood-plastic composite materials and plastic lumber materials shall be evaluated after weathering in accordance with Method A "Test Method for Accelerated Weathering of Fire-Retardant-Treated Wood for Fire Testing" in ASTM D2898.

402.4.3.2 Wood-plastic composite materials. Wood-plastic composite materials shall also demonstrate acceptable fire performance after weathering by the following procedure: first testing in accordance with ASTM E1354 at an incident heat flux of 50 kW/m2 in the horizontal orientation, then weathering in accordance with ASTM D7032 and then retesting in accordance with ASTM E1354 and exhibiting an increase of no more than 10 percent in peak rate of heat release when compared to the peak heat release rate of the nonweathered material.

402.4.3.3 Plastic lumber materials. Plastic lumber materials shall also demonstrate acceptable fire performance after weathering by the following procedure: first testing in accordance with ASTM E1354 at an incident heat flux of 50 kW/m2 in the horizontal orientation, then weathering in accordance with ASTM D6662 and then retesting in accordance with ASTM E1354 and exhibiting an increase of no more than 10 percent in peak rate of heat release when compared to the peak heat release rate of the nonweathered material.

SECTION 403 STRUCTURE HARDENING

403.1 General. Structure hardening shall be in accordance with Sections 403.2 through 403.13 and shall apply to buildings and structures hereafter constructed, modified or relocated into or within areas of the *wildland-urban interface.* See also Sections 101.6 and 101.7.

403.2 Roofing. Roofs shall have a *roof covering* or *roof assembly* classified as Class A when tested in accordance with ASTM E108 or UL 790.

403.2.1 Flame and ember protection of roofs. For roof assemblies where the roof covering profile creates a space between the roof covering and roof deck, the space shall resist the entry of flames and embers by one or more of the following methods:

1. Firestopping with noncombustible material of the space between the roof covering and the roof deck.
2. Installation of one layer of cap sheet complying with ASTM D3909 over the combustible roof deck.
3. Installation of a listed Class A classified roof assembly.

403.2.2 Roof valley flashings. Valley flashings shall be not less than 0.019 inch (No. 26 galvanized sheet gage) corrosion-resistant metal installed over a minimum 36- inch-wide underlayment consisting of one layer of cap sheet complying with ASTM D3909 running the full length of the valley.

403.3 Gutters and downspouts. Gutters and downspouts shall be constructed of *noncombustible* material.

403.4 Ventilation Openings. Ventilation openings for enclosed attics, enclosed rafter spaces, and underfloor spaces shall be in accordance with Section 403.4.1 or Section 403.4.2 as applicable.

403.4.1 Performance Requirements. Ventilation openings shall be fully covered with listed vents, tested in accordance with ASTM E2886, to demonstrate compliance with all the following requirements:

1. There shall be no flaming ignition of the cotton material during the Ember Intrusion Test.
2. There shall be no flaming ignition during the Integrity Test portion of the Flame Intrusion Test.
3. The maximum temperature of the unexposed side of the vent shall not exceed 662°F (350°C).

403.4.2 Prescriptive Requirements. Ventilation openings for enclosed attics, enclosed rafter spaces, and underfloor spaces shall be covered with *noncombustible* corrosion-resistant mesh with openings not to exceed ⅛-inch.

403.5 Protection of eaves. Eaves and soffits shall be protected on the exposed underside by *noncombustible material, ignition-resistant materials,* or by materials approved for not less than 1-hour *fire-resistance-rated construction*, *⅝-inch Type X drywall,* 2-inch nominal dimension lumber, or 1 inch nominal *fire-retardant-treated wood* or ¾ inch nominal fire-

retardant-treated plywood, identified for exterior use and meeting the requirements of Section 2303.2 of the 2024 *International Building Code*. Fascias are required and shall be protected on the backside by *noncombustible material, ignition-resistant materials,* or by materials approved for not less than 1-hour *fire-resistance-rated construction, ⅝-inch Type X drywall,* or 2- inch nominal dimension lumber.

403.6 Exterior walls. Exterior walls of buildings or structures shall be constructed with one of the following methods:

1. Exterior wall assemblies with a minimum of 1-hour fire-resistance rating, rated for exposure on the exterior side.
2. *Approved noncombustible materials.*
3. *Heavy timber* or *log wall construction.*
4. *Noncombustible* materials complying with Section 402.2 on the exterior side.
5. *Fire-retardant treated wood* complying with Section 402.3 on the exterior side. The *fire-retardant-treated wood* shall be labeled for exterior use and meet the requirements of Section 2303.2 of the 2024 *International Building Code*.
6. Ignition-resistant materials complying with Section 402.4 on the exterior side.

Such material shall extend from the top of the foundation to the underside of the eave or the underside of the roof sheathing.

Exceptions:

1. Exterior wall *embellishments* and architectural trim (exclusive of trim on exterior windows and doors) not to exceed 5 percent of the square footage of the exterior wall.
2. Roof or wall top cornice projections and similar assemblies.
3. Solid wood rafter tails and solid wood blocking installed between rafters having minimum dimension 2 inch nominal.

403.6.1 Exterior wall coverings. Exterior wall coverings shall be limited to the following:

1. *Noncombustible* materials.
2. *Fire-retardant-treated wood*.
3. *Ignition-resistant building materials*.

Exception: Where options 1 or 2 in section 403.6 are used, vinyl siding may be used as an exterior covering.

403.6.2 Flashing. A minimum of 6 inches of metal flashing or *noncombustible* material applied vertically between the wall sheathing and the exterior cladding shall be installed at the ground, decking, and roof intersections.

Combustible sheathing products exposed by the gap created at the base of the exterior walls, posts, or columns must be protected with *noncombustible material* or *ignition-resistant building materials* while still permitting drainage and moisture control from behind exterior cladding.

403.7 Underfloor enclosure. Buildings or structures shall have underfloor areas enclosed to the ground or comply with exterior walls in accordance with Section 403.6.

403.8 Decking. Unenclosed decks shall have the deck walking surface constructed of one of the

following:

1. *Approved noncombustible* materials
2. Class A rated material

   Exception: Composite decking material with a minimum of Class B rating
3. *Fire-retardant-treated wood* identified for exterior use and meeting the requirements of Section 2303.2 of the 2024 *International Building Code*
4. *Ignition-resistant building materials* in accordance with Section 402.4.

403.9 Appendages and projections. Appendages and projections shall be constructed in accordance with Section 403.6.

403.10 Exterior glazing. Exterior windows, window walls and glazed doors, windows within exterior doors, and skylights shall be tempered glass, *multilayered glazed panels*, glass block or have a fire protection rating of not less than 20 minutes.

403.11 Exterior doors. Exterior doors shall be *approved noncombustible* construction, solid core wood not less than 1 ¾-inches thick, or have a fire protection rating of not less than 20 minutes. Windows within doors and glazed doors shall be in accordance with Section 403.10.

Exception: Vehicle access doors.

403.12 Vehicle access door perimeter gap. Exterior vehicle access doors shall resist the intrusion of embers from entering by preventing gaps between doors and door openings, at the head, sill, and jamb of doors from exceeding ⅛ inch as approved by the AHJ.

Gaps between doors and door openings shall be controlled by one of the following methods:

1. Weather-stripping products made of materials that: (a) have been tested for tensile strength in accordance with ASTM D638 (Standard Test Method for Tensile Properties of Plastics) after exposure to ASTM G155 (Standard Practice for Operating Xenon Arc Light Apparatus for Exposure of Non-Metallic Materials) for a period of 2,000 hours, when the maximum allowable difference in tensile strength values between exposed and

   non-exposed samples does not exceed 10 percent; and (b) exhibit a V-2 or better flammability rating when tested to UL 94 (Standards for Tests for Flammability of Plastic Materials for Parts in Devices and Appliances).
2. Door overlaps onto jambs and headers.
3. Garage door jambs and headers covered with metal flashing.

403.13 Detached accessory structures. Detached *accessory structures* located less than 50 feet from a building containing *habitable* or *occupiable space* shall have exterior walls constructed in accordance with Sections 403.6 through 403.6.2.

403.13.1 Underfloor areas. Where the detached structure is located and constructed so that the structure or any portion thereof projects over a descending *slope* surface greater than 10 percent, the area below the structure shall have underfloor areas enclosed to within 6 inches of the ground, with exterior wall construction in accordance with Section 403.6 or underfloor protection in accordance with Section 403.7 or with ⅛-inch metal corrosion-resistant screen with a hardened zone within 5 feet.

Exception: The enclosure shall not be required where the underside of exposed floors and exposed structural columns, beams and supporting walls are protected as required for exterior 1-hour *fire-resistance-rated construction, heavy timber construction, noncombustible* materials on the exterior side, or *fire-retardant-treated wood* on the exterior side. The *fire-retardant-treated wood* shall be labeled for exterior use and meet the requirements of Section 2303.2 of the 2024 *International Building Code.*

Chapter 5 - Site and Area Requirements

SECTION 501 GENERAL

501.1 Scope. The provisions of this chapter shall apply to parcels subject to this code.

501.2 Reference. As needed, the *code official* shall refer to the Home Ignition Zone (HIZ) Guide as developed by the Colorado State Forest Service (https://csfs.colostate.edu/wp-content/uploads/2021/04/2021_CSFS_HIZGuide_Web.pdf)). Where conflicts occur between provisions of this code and the HIZ Guide, the provisions of this code shall govern. The provisions of this code, as applicable, shall take precedence over the provisions in the referenced standard.

501.3 Landscaping and plantings. LFRA recommends that plantings and landscape vegetation be classified as ignition-resistant, drought-resistant and native to the area, such as those listed on Fact Sheet 6.303 *Fire-resistant Landscaping* published by the Colorado State Forest Service and Colorado State University Extension Service (Revised November 2024). This applies to vegetation in all Ignition Zones (Immediate, Intermediate and Expanded).

SECTION 502 REQUIREMENTS

502.1 Structure Ignition Zone 1 (0-5 feet): Immediate Zone

502.1.1 Objective. This zone is designed to reduce or eliminate ember ignition and direct flame contact with the structure, decks, stairs, and attachments.

502.1.2 Materials. Only *noncombustible*, hard-surface materials are allowed in this zone, such as rock, gravel, sand, concrete, bare earth and/or stone/concrete pavers.

502.1.3 Plantings. Remove all plantings including shrubs, slash, combustible mulch and other woody debris.

502.1.4 Trees. There shall be no planting of new trees in the immediate zone. Mature trees of no less than 10-inch diameter at 4.5 feet above ground level may be maintained.

Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet.

Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.

502.2 Structure Ignition Zone 2 (5-30 feet) Intermediate Zone

502.2.1 Objective. This zone is designed to give an approaching fire less fuel, which will help reduce its intensity as it gets nearer to structures.

502.2.1 Dead Materials. Within the *fuel modification* area, hazardous dead plant material must be removed from live vegetation.

502.2.2 Fuels Accumulation. Avoid large accumulations of surface fuels such as logs, branches, slash and combustible mulch.

502.2.3 Trees. *Tree crowns* extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet. Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less. *Tree crowns* within this zone shall be spaced to prevent structure ignition and promote fuel discontinuity to limit fire spread.

502.2.4 Shrubs. Shrub groups within this zone shall be spaced to prevent structure ignition. Shrubs shall be at least 10 feet away from the edge of tree branches.

502.3 Structure Ignition Zone 3 (30-100 feet) Expanded Zone

502.3.1 Objective. This zone focuses on mitigation that keeps fire on the ground.

502.3.2 Tree Spacing. *Tree crowns* within this zone shall be spaced at a minimum of 6-10 feet.

502.4 Site Signage

502.4.1 Marking of roads. *Approved* signs or other *approved* notices shall be provided and maintained for access roads and driveways to identify such roads and prohibit the obstruction thereof.

502.4.2 Marking of fire protection equipment. Fire protection equipment and fire hydrants shall be clearly identified in a manner *approved* by the *code official* to prevent obstruction.

502.4.3 Address markers. Buildings shall have a permanently posted address, which shall be placed at each driveway entrance and be visible from both directions of travel along the road. In all cases, the address shall be posted at the beginning of construction and shall be maintained thereafter, and the address shall be visible and legible from the road on which the address is located in a manner *approved* by the *code official*.

502.5 Retaining Walls

502.5.1 Retaining Walls. Retaining walls shall be constructed with either *noncombustible* or ignition-resistant materials when any of the following conditions exist:

1. The retaining wall is within 8 feet of a structure regulated by this code or up to the property line when the property line is less than 8 feet away from the structure.

2. The retaining wall is integral to the support of a structure regulated by this code.

3. The retaining wall is integral to the egress from a structure regulated by this code to a public way, easement, or private road.

502.6 Fencing

502.6.1 Fencing. Fencing within 8 feet of a structure regulated by this code or up to the property line when the property line is less than 8 feet away from the structure shall be constructed with *noncombustible* or ignition-resistant materials, such as metal, stone or approved composite products.

Exception: Vinyl fencing. Vinyl fencing may be allowed.

502.6.2 Fences adjacent to open spaces. Fences constructed adjacent to parks, common areas, open space, and environmentally sensitive areas shall be an open two- or three-rail design. Wire mesh may be placed on the interior side of the fence.

502.6.3 Lots interior to subdivisions. On lots internal in subdivisions (not adjacent to parks, open lands, etc.), open-rail or privacy fences are allowed on rear property lines and side property lines.

502.6.4 Privacy fences. Privacy fences shall have a minimum 2-inch separation between the bottom of the fence and the ground, and the planks shall not have separation gaps of more than 1 inch. Wire mesh may be placed on the interior side of the fence. Back-to-back fences and shadow box fences are prohibited.

502.7 Parks and common areas

502.7.1 Park common areas. Play structures, picnic shelters, benches, trash receptacles and other similar structures within parks, open space and common areas shall be constructed of ignition resistant materials.

502.8 Defensible space design

502.8.1 Designing defensible space for developments. When possible, new developments and subdivisions in the WUI area should be designed with defensible space, fire breaks and/or emergency vehicle access routes around the development, particularly adjacent to where fire would likely approach the development, such as the western side of a development near the foothills. Examples include but are not limited to paved recreation trails, gravel trails, streets with no development on the “fire approach side,” dirt roads, etc. Design will be approved by the fire code official during the development review process.

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Appendix A: CONSTRUCTION DOCUMENTS

A101.1 General. Plans, engineering calculations, diagrams and other data shall be submitted in the format as required by the jurisdiction. The construction documents shall be prepared and submitted where required by the statutes of the jurisdiction in which the project is to be constructed. Where special conditions exist, the *code official* is authorized to require additional documentation.

> **Exception:** Submission of plans, calculations, construction inspection requirements and other data, if it is found that the nature of the work applied for is such that reviewing of plans is not necessary to obtain compliance with this code.

A101.2 Information on plans and specifications. Plans and specifications shall be drawn to scale on substantial paper or cloth and shall be of sufficient clarity to indicate the location, nature and extent of the work proposed, and show in detail that it will conform to the provisions of this code and relevant laws, ordinances, rules and regulations.

A101.3 Site plan. In addition to the requirements for plans in the *International Building Code*, site plans shall include topography, landscape and vegetation details and locations of structures or building envelopes. The *code official* is authorized to waive or modify the requirement for a site plan where the application for permit is for alteration or repair or where otherwise warranted. Identify the *fire intensity classification*.

> **A101.3.1 Defensible Space Site Plans.** Defensible space site plans shall be prepared and submitted to the *code official* for review and approval as part of the site plans required for a permit. The *code official* is authorized to waive or modify the requirement for a defensible space site plan where the application for permit is for alteration or repair or where otherwise warranted.

A101.5 Other data and substantiation. Where required by the *code official*, the plans and specifications shall include classification of fuel loading, fuel model light, medium or heavy, and substantiating data to verify classification of fire-resistive vegetation.

A101.6 Retention of plans. One set of *approved* plans, specifications and computations shall be retained by the *code official* for a period of not less than 180 days from date of completion of the permitted work or as required by state or local laws.

A101.7 Examination of documents. The *code official* shall examine or cause to be examined the accompanying construction documents and shall ascertain by such examinations whether the construction indicated and described is in accordance with the requirements of this code and other pertinent laws or ordinances.

A101.8 Amended construction documents. Work shall be installed in accordance with the *approved* construction documents, and changes made during construction that are not in

compliance with the *approved* documents shall be resubmitted for approval as an amended set of construction documents.

A101.9 Previous approvals. This code shall not require changes in the construction documents, construction or designated occupancy of a structure for which a lawful permit has been heretofore issued or otherwise lawfully authorized, and the construction of which has been pursued in good faith within 180 days after the effective date of this code and has not been abandoned.

A101.10 Phased approval. The *code official* is authorized to issue a permit for the construction of foundations or any other part of a building or structure before the construction documents for the whole building or structure have been submitted, provided that adequate information and detailed statements have been filed complying with pertinent requirements of this code. The holder of such permit for the foundation or other parts of a building or structure shall proceed at the holder's own risk with the building operation and without assurance that a permit for the entire structure will be granted.

Appendix B: INSPECTION AND ENFORCEMENT

B101.1 Inspection. Inspections shall be in accordance with Sections B101.1.1 through B101.1.4.3.

B101.1.1 General. Construction or work for which a permit is required by this code shall be subject to inspection by the *code official* and such construction or work shall remain visible and able to be accessed for inspection purposes until *approved* by the *code official*. It shall be the duty of the permit applicant to cause the work to remain visible and able to be accessed for inspection purposes. Neither the *code official* nor the jurisdiction shall be liable for expense entailed in the removal or replacement of any material required to allow inspection.

Approval as a result of an inspection shall not be construed to be an approval of a violation of the provisions of this code or of other ordinances of the jurisdiction. Inspections presuming to give authority to violate or cancel the provisions of this code or of other ordinances of the jurisdiction shall not be valid.

Where required by the *code official*, a survey of the lot shall be provided to verify that the mitigation features are provided and the building or structure is located in accordance with the *approved* plans.

B101.1.2 Authority to inspect. The *code official* shall inspect, as often as necessary, buildings and premises, including such other hazards or appliances designated by the *code official* for the purpose of ascertaining and causing to be corrected any conditions that could reasonably be expected to cause fire or contribute to its spread, or any violation of the purpose of this code and of any other law or standard affecting fire safety.

B101.1.2.1 Approved inspection agencies. The *code official* is authorized to accept reports of approved inspection agencies, provided that such agencies satisfy the requirements as to qualifications and reliability.

B101.1.2.2 Inspection requests. It shall be the duty of the holder of the permit or their duly authorized agent to notify the *code official* when work is ready for inspection. It shall be the duty of the permit holder to provide access to and means for inspections of such work that are required by this code.

B101.1.2.3 Approval required. Work shall not be done beyond the point indicated in each successive inspection without first obtaining the approval of the *code official*. The *code official*, upon notification, shall make the requested inspections and shall either indicate the portion of the construction that is satisfactory as completed, or notify the permit holder or his or her agent wherein the same fails to comply with this

code. Any portions that do not comply shall be corrected and such portion shall not be covered or concealed until authorized by the *code official*.

B101.1.3 Reinspections. To determine compliance with this code, the *code official* can cause a structure to be reinspected. A fee can be assessed for each inspection or reinspection where work for which inspection is called is not complete or where corrections called for are not made.

Reinspection fees can be assessed where the *approved* plans are not readily available to the inspector, for failure to provide access on the date for which inspection is requested or for deviating from plans requiring the approval of the *code official*.

To obtain a reinspection, the applicant shall pay the reinspection fee as set forth in the fee schedule adopted by the jurisdiction. Where reinspection fees have been assessed, additional inspection of the work will not be performed until the required fees have been paid.

B101.1.4 Testing. Installations shall be tested as required in this code and in accordance with Sections B101.1.4.1 through B101.1.4.3. Tests shall be made by the permit holder or authorized agent and observed by the *code official*.

B101.1.4.1 New, altered, extended or repaired installations. New installations and parts of existing installations that have been altered, extended, renovated or repaired, shall be tested as prescribed herein to disclose defects.

B101.1.4.2 Apparatus, instruments, material and labor for tests. Apparatus, instruments, material and labor required for testing an installation or part thereof shall be furnished by the permit holder or authorized agent.

B101.1.4.3 Reinspection and testing. Where any work or installation does not pass an initial test or inspection, the necessary corrections shall be made so as to achieve compliance with this code. The work or installation shall then be resubmitted to the *code official* for inspection and testing.

B101.2 Enforcement. Enforcement shall be in accordance with Sections B101.2.1 and B101.2.2.

B**101.2.1 Authorization to issue corrective orders and notices.** Where the *code official* finds any building or premises that are in violation of this code, the *code official* is authorized to issue corrective orders and notices.

B101.2.2 Service of orders and notices. Orders and notices authorized or required by this code shall be given or served on the owner, the owner's authorized agent, operator, occupant or other person responsible for the condition or violation either by verbal notification, personal service, or delivering the same to, and leaving it with, a person of suitable age and discretion on the premises; or, if such person is not found on the premises, by affixing a copy thereof in a conspicuous place on the door to the entrance of

said premises and by mailing a copy thereof to such person by registered or certified mail to the person's last known address.

Orders or notices that are given verbally shall be confirmed by service in writing as herein provided.

B101.3 Compliance with orders and notices. Compliance with orders and notices shall be in accordance with Sections B101.3.1 through B101.3.8.

B101.3.1 General compliance. Orders and notices issued or served as provided by this code shall be complied with by the owner, the owner's authorized agent, operator, occupant or other person responsible for the condition or violation to which the corrective order or notice pertains.

If the building or premises is not occupied, then such corrective orders or notices shall be complied with by the owner or the owner's authorized agent.

B101.3.2 Compliance with tags. building or premises shall not be used when in violation of this code as noted on a tag affixed in accordance with Section B101.3.1.

B101.3.3 Removal and destruction of signs and tags. A sign or tag posted or affixed by the *code official* shall not be mutilated, destroyed or removed without authorization by the *code official*.

B101.3.4 Citations. Persons operating or maintaining an occupancy or premises subject to this code who allow a hazard to exist or fail to take immediate action to abate a hazard on such occupancy, premises or vehicle when ordered or notified to do so by the *code official* shall be guilty of a misdemeanor.

B101.3.5 Unsafe conditions. Buildings, structures or premises that constitute a fire hazard or are otherwise dangerous to human life, or that in relation to existing use constitute a hazard to safety or health or public welfare, by reason of inadequate maintenance, dilapidation, obsolescence, fire hazard, disaster damage or abandonment as specified in this code or any other ordinance, are unsafe conditions. Unsafe buildings or structures shall not be used. Unsafe buildings are hereby declared to be public nuisances and shall be abated by repair, rehabilitation, demolition or removal, pursuant to applicable state and local laws and codes.

B101.3.5.1 Record. The *code official* shall cause a report to be filed on an unsafe condition. The report shall state the occupancy of the structure and the nature of the unsafe condition.

B101.3.5.2 Notice. Where an unsafe condition is found, the *code official* shall serve on the owner, owner's authorized agent or person in control of the building, structure or premises, a written notice that describes the condition deemed unsafe and specifies the required repairs or improvements to be made to abate the unsafe condition, or requires the unsafe structure to be demolished. Such notice shall require the person

thus notified, or their designee, to declare to the *code official* within a stipulated time, acceptance or rejection of the terms of the order.

B101.3.5.2.1 Method of service. Such notice shall be deemed properly served where a copy thereof is served by one of the following methods:

1. Delivered to the owner or the owner's authorized agent personally.
2. Sent by certified or registered mail addressed to the owner or the owner's authorized agent at the last known address with a return receipt requested.
3. Delivered in any other manner as prescribed by local law.

Where the certified or registered letter is returned showing that the letter was not delivered, a copy thereof shall be posted in a conspicuous place in or about the structure affected by such notice. Service of such notice in the foregoing manner on the owner's authorized agent or on the person responsible for the structure shall constitute service of notice on the owner.

B101.3.5.3 Placarding. Upon failure of the owner, the owner's authorized agent or the person responsible to comply with the notice provisions within the time given, the *code official* shall post on the premises or on defective equipment a placard bearing the word "UNSAFE" and a statement of the penalties provided for occupying the premises, operating the equipment or removing the placard.

B101.3.5.3.1 Placard removal. The *code official* shall remove the unsafe condition placard whenever the defect or defects on which the unsafe condition and placarding action were based have been eliminated. Any person who defaces or removes an unsafe condition placard without the approval of the *code official* shall be subject to the penalties provided by this code.

B101.3.5.4 Abatement. The owner, the owner's authorized agent, operator or occupant of a building, structure or premises deemed unsafe by the *code official* shall abate, correct or cause to be abated or corrected such unsafe conditions either by repair, rehabilitation, demolition or other *approved* corrective action.

B101.3.5.5 Summary abatement. Where conditions exist that are deemed hazardous to life and property, the *code official* is authorized to abate or correct summarily such hazardous conditions that are in violation of this code.

B101.3.5.6 Evacuation. The *code official* shall be authorized to order the immediate evacuation of any occupied building, structure or premises deemed unsafe where such hazardous conditions exist that present imminent danger to the occupants. Persons so notified shall immediately leave the structure or premises and shall not enter or reenter until authorized to do so by the *code official*.

B101.3.6 Prosecution of violation. If the notice of violation is not complied with promptly, the *code official* is authorized to request the legal counsel of the jurisdiction to

institute the appropriate proceeding at law or in equity to restrain, correct or abate such violation, or to require the removal or termination of the unlawful occupancy of the building or structure in violation of the provisions of this code or of the order or direction made pursuant thereto.

B101.3.7 Violation penalties. An AHJ has the authority to establish fees.

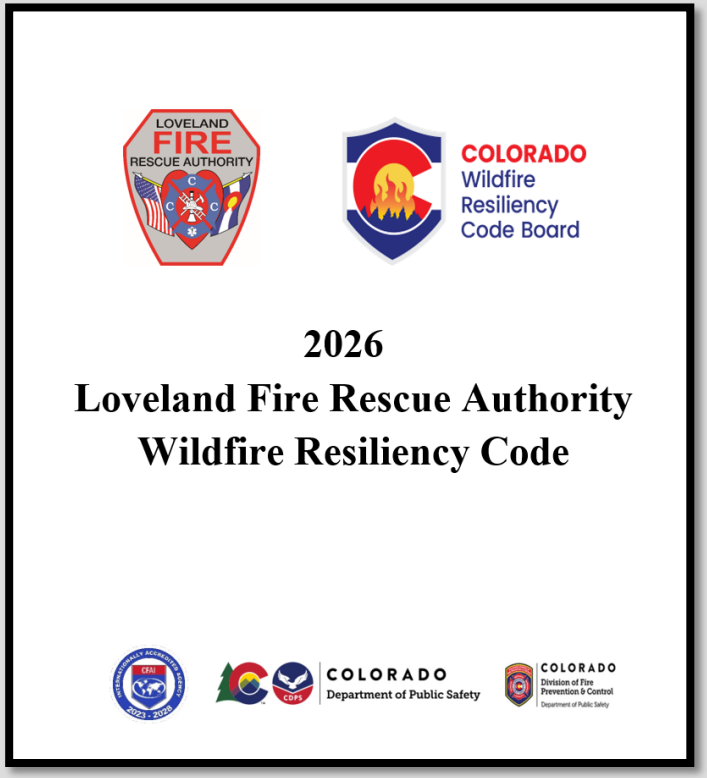
B101.3.8 Abatement of violation. In addition to the imposition of the penalties herein described, the *code official* is authorized to institute appropriate action to prevent unlawful construction or to restrain, correct or abate a violation; or to prevent illegal occupancy of a structure or premises; or to stop an illegal act, conduct of business or occupancy of a structure on or about any premises.

2026 WILDFIRE RESILIENCY CODE UPDATE

Existing LFRA Wildfire Risk Reduction Code
New Statewide Wildfire Resiliency Code

Sarah Winter, Fire Marshal
LOVELAND FIRE RESCUE AUTHORITY

LOVELAND CITY COUNCIL
March 24, 2026



LFRA Wildfire Resiliency Code Update

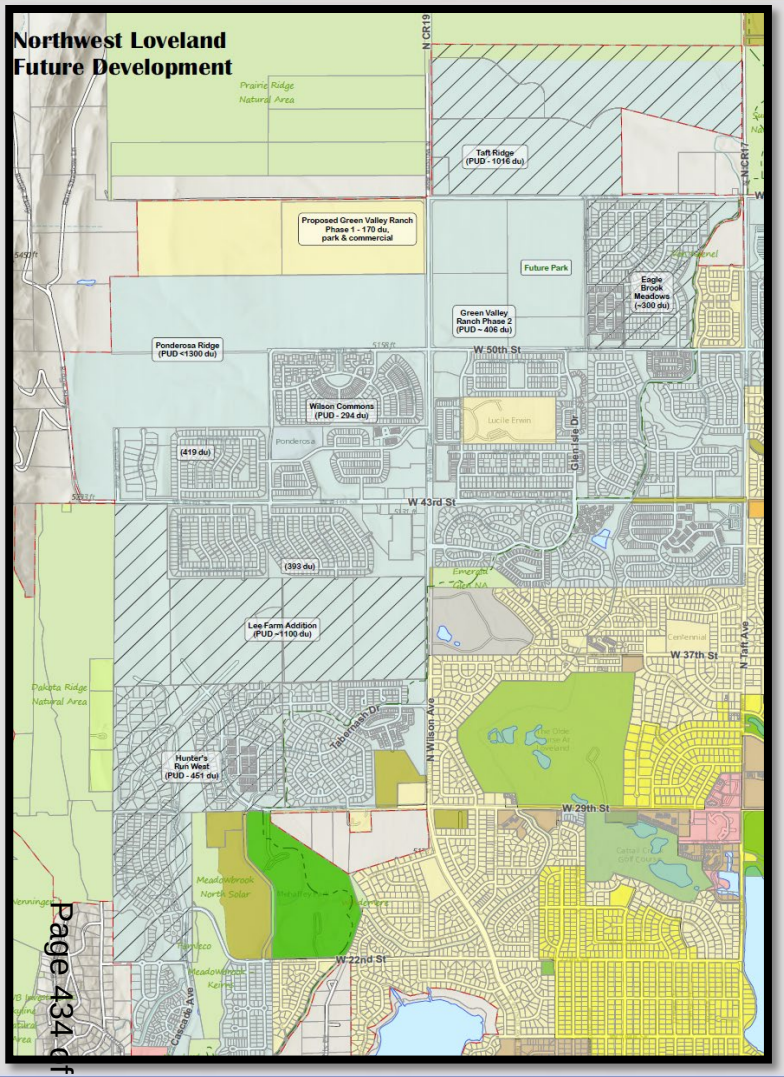
Wildfire Resiliency Code: From Post-disaster Recovery to Pre-disaster Prevention



Community Benefits of WRC

- Sets requirements for new construction
  - Encourages mitigation for existing homes and businesses
- Clear direction and identification of requirements
- Reduces risk of fire spread through home hardening and vegetation management
- Supports public safety improvements to prevent wildfire spread
- Eliminates or reduces rebuilding costs
- Reduces environmental impact

LFRA Wildfire Resiliency Code Update



~ 4,000 NEW RESIDENTIAL UNITS IN NW LOVELAND

2022: LFRA creates a 25-member committee to consider measures to reduce risk of wildfire

- ❑ Fire service
- ❑ City of Loveland and Larimer County development and building officials
- ❑ Homebuilders
- ❑ Real estate

Adoption of Appendix O – Wildfire Risk Reduction (2021 IFC)

- ❑ CWPP essential to process
- ❑ NEW CONSTRUCTION, NOT RETROACTIVE
- ❑ Construction hardening (materials and methods)
- ❑ Fuels management (defensible space)
- ❑ Fencing

July 1, 2023 to present

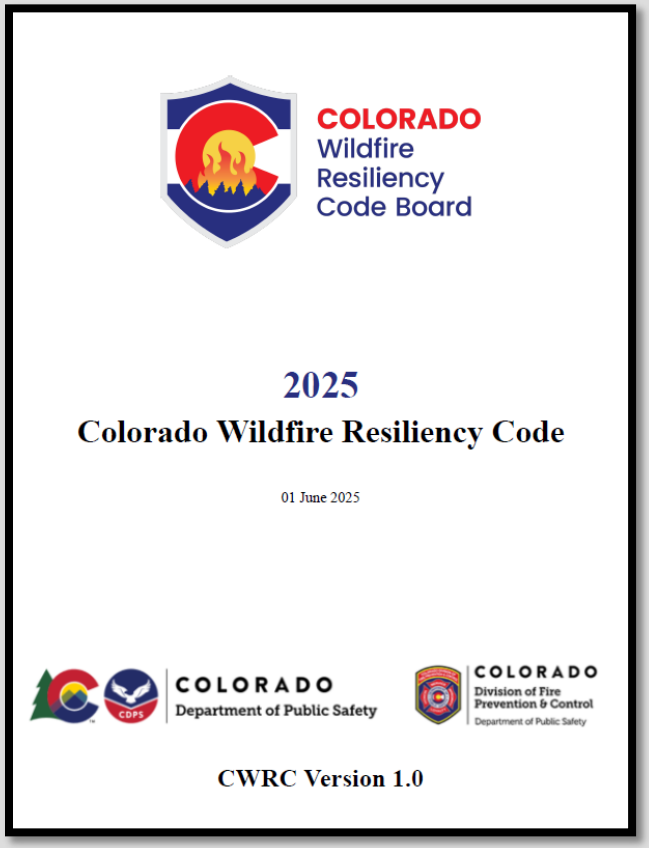
- ❑ Review and approve construction documents for permits and complete inspections prior to occupancy
- ❑ 296 permits – 249 city, 47 county

LFRA Wildfire Resiliency Code Update

Fall 2023

- Senate Bill 23-166 established a Wildfire Resiliency Code Board
- Task: Adopt a code to help enhance community safety and resiliency from wildfires
- 21 appointed voting members with specific government or industry qualifications:
  - ❑ Municipality that adopted a wildfire resiliency code prior to Sept. 30, 2023 – **Fire Marshal Dann**
  - ❑ Fire service
  - ❑ Municipal government
  - ❑ Elected officials
  - ❑ Development services
  - ❑ Utilities
  - ❑ Architecture
  - ❑ Wildfire
  - ❑ Land planning
  - ❑ Insurance
  - ❑ Building trades
- Public hearings and input statewide
- 1.5 years to develop a statewide code, meeting monthly

State deadlines
Adoption: April 1
Enforcement: July 1



LFRA Wildfire Resiliency Code Update

Construction Hardening

- Class A roof
- Ignition-resistant cladding
- Overhangs and projections
- Decks
- Vents 1/8”
- Base of walls, posts, columns
- Exterior doors
- Windows



Fencing

- 8’ noncomb. to house
- Rail at open spaces
- Privacy on lots lines
- No dbl./shadow box

Fuels Management

- 0-5’ noncomb.
- Ignition-resistant plants
- Pruning and limbing up
- Clearance to structure

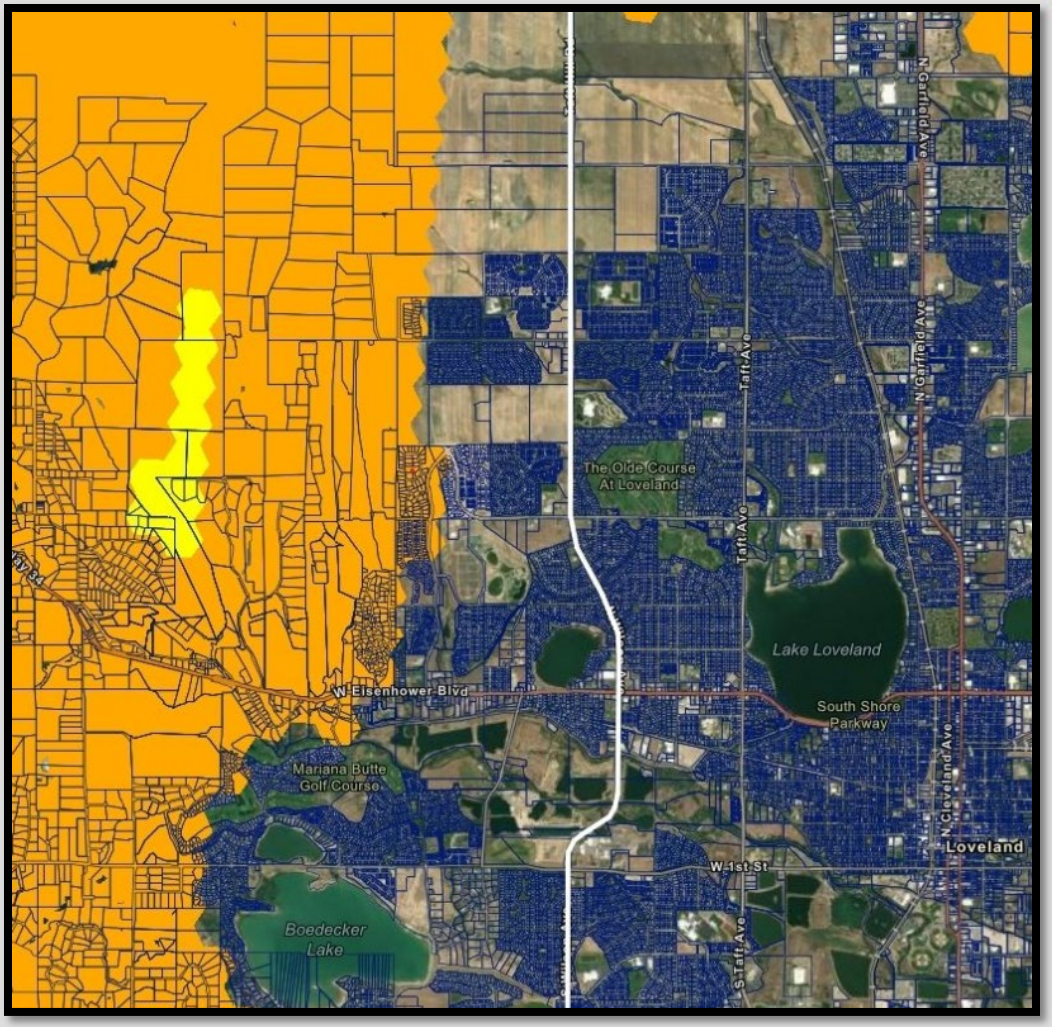




Structures are 40-60% more likely to survive a wildfire

LFRA Wildfire Resiliency Code Update

CSFS WRC Map vs. LFRA CWPP



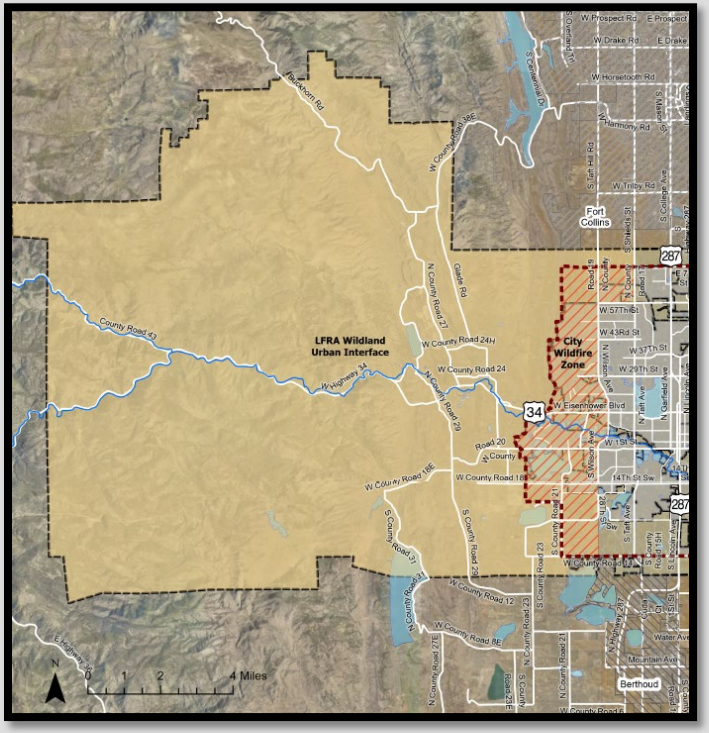
LFRA Wildfire Resiliency Code Update

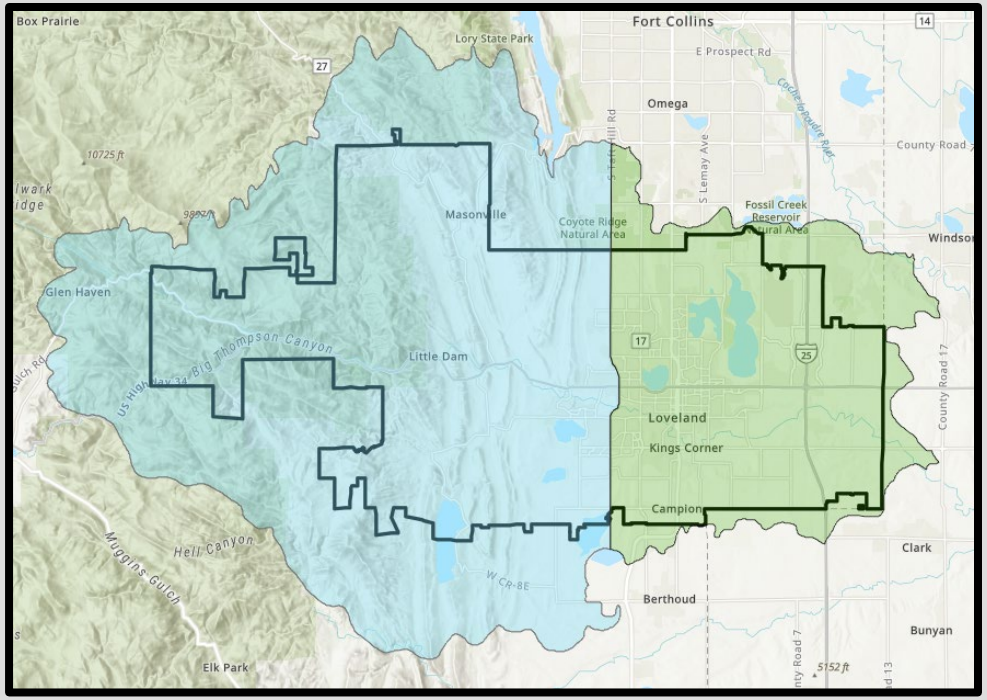
LFRA CWPP WUI Looking West



LFRA Wildfire Resiliency Code Update

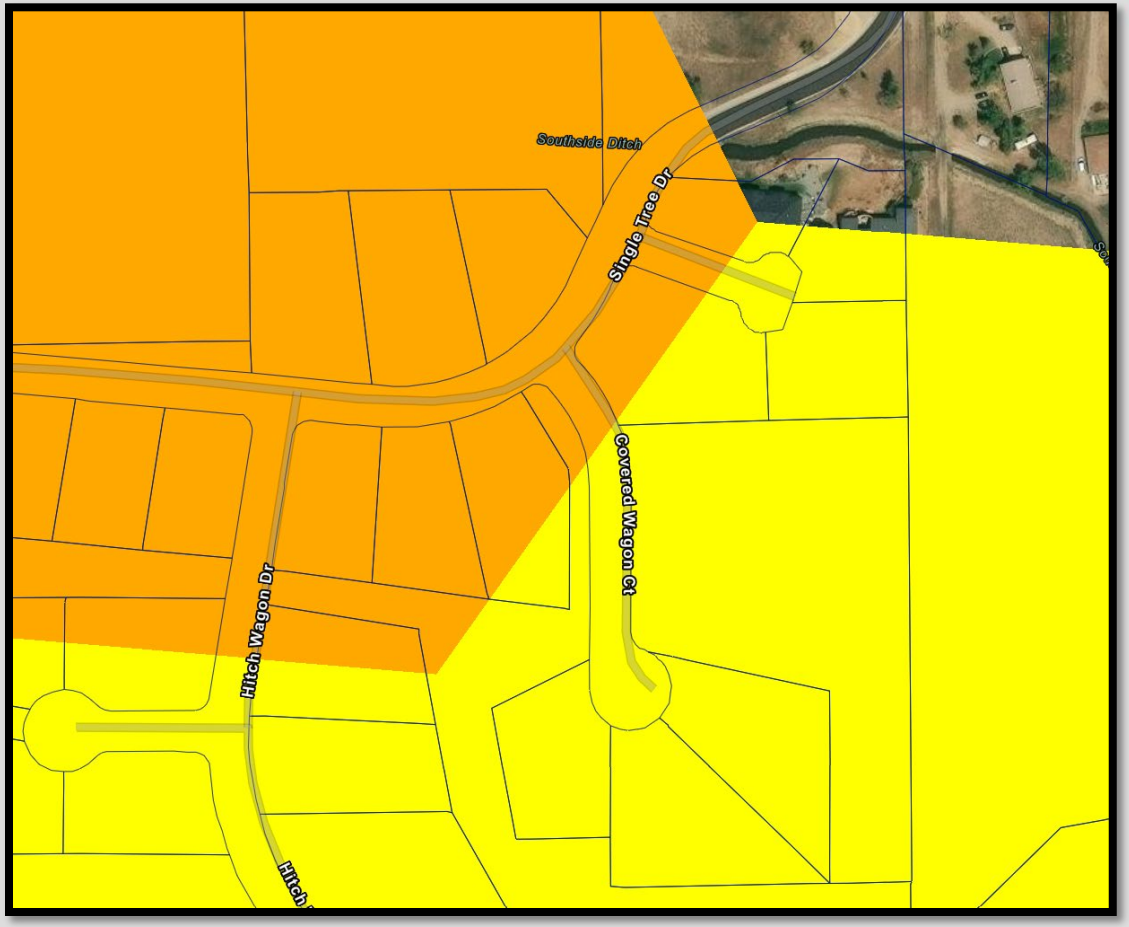
LFRA Map Based on CWPP Modeling





LFRA Wildfire Resiliency Code Update

Eliminates Confusion About Individual Properties



CSFS Map

LFRA Wildfire Resiliency Code Update

Ground-truthing

Mapping to reflect current, site-specific conditions







Sugar Creek Development – East 71st St./CR 30

LFRA Wildfire Resiliency Code Update

Adoptions/Approvals

- ✓ LFRA Board
- ❑ Loveland City Council
- ✓ Larimer County BoCC
- ✓ Town of Johnstown Board

LFRA Wildfire Resiliency Code Update

Maui Miracle House, 271 Front St., Lahaina, Maui, Hawaii

- Lahaina Fire – Aug. 8, 2023
- 102 deaths
- 2,200 structures lost
- $5.5 billion in damages



Before Renovation



After Renovation

LFRA Wildfire Resiliency Code Update



References

- *2021 International Fire Code – Appendix O – Wildfire Risk Reduction*
- *2025 Colorado Wildfire Resiliency Code*
- *2026 LFRA Wildfire Resiliency Code*
- *Institute for Business & Home Safety (IBHS)*
- *Colorado Division of Fire Prevention and Control*
- *National Institute of Building Science*
- *LFRA Community Wildfire Protection Plan (2023)*
- *Establishment of a Wildfire Resiliency Code Board, SB23-166, Colorado General Assembly (May 12, 2023)*

Resolution No. R-181

**RESOLUTION OF THE
BOARD OF DIRECTORS OF THE
LOVELAND FIRE RESCUE AUTHORITY**

RESOLUTION (1) ADOPTING THE 2026 LOVELAND FIRE RESCUE AUTHORITY WILDFIRE RESILIENCY CODE AS ADOPTED BY THE CITY OF LOVELAND, AND THE 2025 STATE OF COLORADO WILDFIRE RESILINCY CODE AS ADOPTED BY THE TOWN OF JOHNSTOWN, AND (2) ACKNOWLEDING LARIMER COUNTY'S ADOPTION OF THE 2025 STATE OF COLORADO WILDFIRE RESILIENCY CODE WITH LOCAL AMENDMENTS FOR ENFORCEMENT WITHIN THE UNINCOPORATED PORTIONS OF LARIMER COUNTY

WHEREAS, the Loveland Fire Rescue Authority ("***Authority***") is a political subdivision of the State of Colorado, established pursuant to the Amended and Restated Intergovernmental Agreement ("***Establishing IGA***") between the City of Loveland ("***City***") and the Loveland Rural Fire Protection District ("***District***") dated November 29, 2017, for the purpose of providing fire suppression, fire prevention and public education, rescue, extrication, hazardous materials, and emergency medical services within their joint jurisdiction and service area. The District's jurisdiction covers portions of Larimer County ("***County***") and the Town of Johnstown ("***Town***");

WHEREAS, Section 1.9(m) of the Establishing IGA authorizes the Authority to administer and enforce the fire codes adopted by the City and the District; however, pursuant to C.R.S. § 32-1-1002(1)(d), a fire code adopted by the District can only be enforced within the County and the Town if it is first approved by the County's Board of County Commissioners and the Town's Board of Trustees, respectively;

WHEREAS, on May 31, 2023, the Authority Board of Directors ("***Board***") approved Resolution R-156, adopting the 2021 Edition of the International Fire Code with the local amendments (collectively, "***2023 Fire Code***"), for enforcement within its jurisdiction. One of the local amendments to the 2023 Fire Code was Appendix O – Wildfire Risk Reduction, which focused on reducing wildfire risk based on construction hardening, landscaping, and fencing;

WHEREAS, on July 30, 2025, the Board approved Resolution R-175, adopting the 2024 Edition of the International Fire Code with local amendments (collectively, "***2025 Fire Code***"), for enforcement within its jurisdiction. However, the 2025 Fire Code omitted Appendix O, because Colorado Senate Bill SB23-166 had created a Wildfire Resiliency Code Board tasked with creating a statewide wildfire resiliency code that also sought to reduce the risk of wildfire through construction hardening and site and area design. The state Wildfire Resiliency Code ("***2025 State WRC***") was adopted by the Wildfire Resiliency Code Board on July 1, 2025;

WHEREAS, LFRA staff have prepared the 2026 Loveland Fire Rescue Authority Wildfire Resiliency Code ("***2026 LFRA WRC***"), attached hereto as Exhibit A, which combines the requirements of former Appendix O and the 2025 State WRC to create wildfire reduction measures at least as stringent as the 2025 State WRC, as is allowed by law;

WHEREAS, the City desires to adopt, and for LFRA to enforce, the 2026 LFRA WRC within the City's jurisdiction, while the Town has adopted, and desires for LFRA to enforce, the 2025 State WRC within the Town's jurisdiction. Separately, the County has adopted the 2025 State WRC with local amendments, which it will enforce directly within the unincorporated portions of the County; and

WHEREAS, by this Resolution, and pursuant to its Establishing IGA, the Authority Board desires to: (a) adopt the 2026 LFRA WRC to become enforceable within that portion of the Authority's jurisdiction that lies within the City immediately upon adoption of the 2026 LFRA WRC by the City Council, and (b) adopt the 2025 State WRC to be enforced within that portion of the Authority's jurisdiction that lies within the Town.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE LOVELAND FIRE RESCUE AUTHORITY:

1. The 2026 LFRA WRC is hereby adopted as the Authority's wildfire resiliency code within that portion of the Authority's jurisdiction that lies within the City, to become enforceable immediately upon adoption of the 2026 LFRA WRC by City Council.

2. The 2025 State WRC is hereby adopted as the Authority's wildfire resiliency code within that portion of the Authority's jurisdiction that lies within the Town, to be enforceable immediately upon adoption of this Resolution.

3. The Authority acknowledges that the County has adopted the 2025 State WRC with local amendments as its wildfire resiliency code, and has elected to enforce such code directly. Accordingly, the Authority will not be involved in enforcement of the County's 2025 State WRC with local amendments within that portion of the Authority's jurisdiction that lies within the County's unincorporated areas.

4. As provided herein, the 2026 LFRA WRC and 2025 State WRC (together, the "***Wildfire Resiliency Codes***"), as applicable, shall be administered and enforced by the Authority's Fire Chief, or his/her authorized representative. For purposes of enforcing the Wildfire Resiliency Codes, the Authority's Fire Marshal is an authorized representative of the Fire Chief. This section shall not limit the designation of additional authorized representatives if the Fire Chief deems it necessary for the effective enforcement of the Wildfire Resiliency Codes.

5. Nothing contained in this Resolution shall be construed as modifying or limiting in any manner the powers, duties, and responsibilities of the Authority, or the Authority's Fire Chief, or his/her authorized representative(s), as provided by the Establishing IGA and all applicable federal, state, or local laws, rules, and ordinances, or common law ("***Applicable Laws***").

6. The Wildfire Resiliency Codes shall be interpreted in conformance with all Applicable Laws, and shall, to the extent possible, be interpreted in a manner that does not conflict with the building codes, regulations, and ordinances of the City or Town, as applicable.

7. If any provision of this Resolution or the attached 2026 LFRA WRC Wildfire Code is for any reason held to be invalid, that invalidity shall not affect the validity of the remaining provisions of this Resolution and the attached 2026 LFRA WRC. The Board of Directors expressly declares it would have adopted this Resolution and the attached 2026 LFRA WRC even if a provision contained in either this Resolution or the attached 2026 LFRA WRC is declared invalid.

APPROVED AND ADOPTED this 28th day of January, 2026.

BOARD OF DIRECTORS
LOVELAND FIRE RESCUE AUTHORITY

President

Secretary

EXHIBIT A

2026 LOVELAND FIRE RESCUE AUTHORITY WILDFIRE RESILIENCY CODE

MEETING DATE:	March 24, 2026
TO:	
DEPARTMENT:	City Clerk's Office
DIRECTOR:	Ashley Macdonald
PRESENTER:	Ashley Macdonald
STRATEGIC PLAN FOCUS AREA:	Livability Outreach, Collaboration & Engagement

AGENDA ITEM:
ORDINANCE OF THE CITY OF LOVELAND TO ESTABLISH THE AD HOC COMMUNITY HOMELESSNESS TRANSITION COMMITTEE

RECOMMENDED CITY COUNCIL ACTION:
A motion to adopt on first reading, Ordinance No. 6823 of the City of Loveland to establish the Ad Hoc Community Homelessness Transition Committee

OPTIONS:

COUNCIL ACTION OPTIONS	CONSEQUENCE
Approve the Motion	An Ad Hoc Community Homelessness Transition Committee will be established.
Deny the motion or take no action	An Ad Hoc Community Homelessness Transition Committee will not be established.
Adopt a Modified Action	Specify the modification in the motion.
Refer back to Staff	Provide specific direction to staff to bring the Ordinance back for consideration.

SUMMARY:

Purpose: The purpose of this Ordinance is to create a Committee. The Committee's purpose is to convene local nonprofits and faith-based partners to develop sustainable solutions that reduce homelessness, and to evaluate service capacity, models, and potential City support for these efforts.

Objective: The Committee will provide the City Council with a final report that includes specific recommendations and potential options for the City's role in future homelessness response.

Impact: The intended impact is to establish criteria to ensure a strategic and sustainable transition away from a model where the City is the primary provider of services and resources.

Council Follow-up: N/A

BUDGET IMPACT:

Budgetary Impact?	Funds Impacted: N/A
	Source(s) of Funding: N/A
Grant Funding?	Grantor(s) (State or Fed): N/A
	City Matching Requirement: N/A
	On-going or One-Time: N/A
	If On-going, when does the grant sunset? N/A
Additional Comments:	N/A

STRATEGIC PLAN FOCUS AREA

Focus	Livability Outreach, Collaboration & Engagement
Strategy (if applicable)	Strive to Ensure Opportunity is Available to All Actively Seek Citizen Engagement
Priority (if applicable)	Reduce Homelessness Boards and Commissions
Notes	

COUNCIL OR BOARD/COMMISSION REVIEW:
Type of Meeting: Regular City Council Meeting

Date of Meeting: January 27, 2026

Resulting Vote: N/A

Discussion: Council formally requested that staff explore establishing a regional task force or ad hoc committee to guide future homelessness efforts.

BACKGROUND:
History:
In early 2026, as the City prepared for the April 30 closure of the Loveland Resource Center (LRC), the Loveland City Council began discussing how to transition away from the City's temporary role as a direct shelter operator. During a Council meeting earlier in the year, Council members expressed support for a more structured, community centered approach to addressing

homelessness. At that meeting, the Council directed staff to explore the creation of a committee that could bring together community partners and guide this transition.

Following that direction, staff developed the framework for the proposed Ad Hoc Community Homelessness Transition Committee. This temporary committee is designed to convene representatives from key City boards and commissions, work collaboratively with nonprofit and faith based organizations, and evaluate service capacity and models that support the unhoused population. Its work will include preparing recommendations that help the City understand the most effective role it can play moving forward.

This effort also reflects a broader City interest in creating a meaningful pathway for new committees to evolve into long term boards or commissions when appropriate. By starting as an ad hoc group, the Committee can test its structure, demonstrate its value, and determine whether its work should continue in a permanent format. This approach allows the City to strengthen community partnership models while ensuring that any long term advisory body is well aligned with community needs and prepared for sustained work.

The proposed ordinance is to formally establish the Committee and is awaiting Council consideration.

Outreach and Notification Efforts: N/A

Conditions met/or anticipated: N/A

Start and End Dates (of studies, design, construction, or in service/operational):

ANALYSIS TABLE:

Yes: ☐ **No:** ☒

LIST OF ATTACHMENTS:

Ordinance
Att 1 Presentation

FIRST READING: March 24, 2026

SECOND READING: _____

ORDINANCE NO. 6823

AN ORDINANCE OF THE CITY OF LOVELAND TO ESTABLISH THE AD HOC COMMUNITY HOMELESSNESS TRANSITION COMMITTEE

WHEREAS, the City Council finds that the City's temporary role as a direct shelter operator is concluding with the closure of the Loveland Resource Center (LRC) on April 30, 2026; and

WHEREAS, the City remains committed to finding both short-term and long-term options to address homelessness in the role of a partner; and

WHEREAS, the City Council finds that establishing a temporary "Ad Hoc Community Homelessness Transition Committee" ("Committee") is necessary to navigate future discussions with community-based nonprofits and faith-based organizations and to encourage community-led partnerships; and

WHEREAS, the City Council further finds that the Committee is necessary to understand the various issues impacting the community's challenges regarding homelessness, to develop and vet options to provide assistance to this vulnerable population, and to provide City Council with recommendations related to the same; and

WHEREAS, Section 10-2 of the City of Loveland Charter authorizes the City Council to create, by ordinance, a new City board or commission.

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LOVELAND, COLORADO:

Section 1. Establishment and Vision. That there is hereby established the Community Homelessness Transition Committee (the "Committee"). The vision of the Committee is to foster a sustainable, community-driven homelessness response where the City serves as a supporting partner to community-led initiatives.

Section 2. Purpose. The purpose of the Committee is as follows:

a) To serve as a facilitator bringing together local nonprofits and faith-based organizations to share proposed options for sustainable outcomes to reduce homelessness in the City.

b) To assess the capacity, service models, and the viability of any City contributions that may be considered.

Section 3. Key Deliverables. The Committee shall provide the City Council with a final report that includes specific recommendations and potential options for the City's role in future homelessness response. The final report shall also rank these options based on criteria established and chosen by the Committee members to ensure a strategic and sustainable transition away from a model where the City is the primary provider of services and resources. To the extent an option is only capable of execution prior to the end of the ad hoc Committees' term, the Committee may make interim recommendations to Council as appropriate and the Committee may receive alternative guidance from the City Council, for example, waiving the requirement for a final report with options.

Section 4. Term. The Committee will be in effect for a period of up to one year from the date of its first meeting, after which date the Committee is dissolved.

Section 5. City Staff Liaisons. City Staff Liaisons shall consist of the City Manager and the City Attorney or their respective designees. The City Manager, or a designee, shall act as the primary contact between the City and the Committee and between the City Council and the Committee. The City Attorney, or a designee, shall act as the legal advisor to the Committee.

Section 6. Membership. The Committee shall be comprised of five (5) members, one from each of the following City Boards and Commissions:

a) Citizens Finance Advisory Commission;

b) Open Lands and Trails Advisory Commission;

c) Police Citizens Advisory Board;

d) Human Services Commission; and

e) Library Board.

Section 7. Appointment and Alternates. Each listed Board and Commission shall select one primary member and one alternate member to serve on the Committee. All individuals seeking membership on the Committee shall be current members of the respective appointing Board or Commission. The alternate shall attend and participate in meetings only in the event the primary selected member cannot attend. In the event a Board or Commission listed in Section 6 fails to appoint a primary member or alternate within thirty (30) days of the effective date of this Ordinance, the vacancy shall be filled by a member from the list of remaining City Boards and Commissions, as selected by the City Manager.

Section 8. Confidentiality and Non-Disclosure. Committee members may be required to execute non-disclosure agreements (NDA) in instances where confidential proposals are reviewed or when reasonable confidentiality is necessary to protect the feasibility of the proposal. Any proposal being considered publicly, involving an NDA, must be made public as early as possible in advance of any public consideration by the Committee.

Section 9. Officers. Upon appointment of all members of the Committee, the membership shall select a chair and vice-chair by majority vote. The chair will preside over meetings, set the agenda, make recommendations to the City Manager, and present the final report to City Council unless said final report is waived by the City Council. The vice-chair shall act as chair at all Committee meetings in the absence of the chair. City staff shall provide administrative support for maintaining minutes and other records.

Section 10. Meetings. The Committee shall meet on an as-needed basis. In addition to the foregoing provisions, the Committee shall be subject to the laws, rules, regulations, and policies of the City of Loveland, including the Handbook for Boards and Commissions.

Section 11. That as provided in City Charter Section 4-9(a)(7), this Ordinance shall be published by title only by the City Clerk after adoption on second reading unless the Ordinance has been amended since first reading in which case the Ordinance shall be published in full or the amendments shall be published in full. This Ordinance shall be in full force and effect ten days after its final publication, as provided in City Charter Section 4-8(b).

ADOPTED this ___ day of _____, 2026.

_____
Patrick McFall, Mayor

ATTEST:

_____
Ashley Macdonald, City Clerk

APPROVED AS TO FORM:

Vince Junglas, City Attorney

AN ORDINANCE OF THE CITY OF LOVELAND TO ESTABLISH THE AD HOC COMMUNITY HOMELESSNESS TRANSITION COMMITTEE

City of Loveland

Establishing an Ad Hoc Community Homelessness Transition Committee

Ashley Macdonald, City Clerk

City Clerk's Office

March 24, 2026

Purpose & Objective

Why are we here?

The purpose of this Ordinance is to create a Committee.

The Committee's purpose is to convene local nonprofits and faith-based partners to develop sustainable solutions that reduce homelessness, and to evaluate service capacity, models, and potential City support for these efforts.

What is the objective of the Committee?

The Committee will provide the City Council with a final report that includes specific recommendations and potential options for the City's role in future homelessness response.

City of Loveland

Agenda

In early 2026, Council directed staff to explore the creation of a committee that could bring together community partners and help guide policy considerations for homeless services.

Background & Agenda

Purpose & Objective

Committee Framework

Public Comment & Council Questions

City of Loveland

Committee Framework

The ordinance provides

- Defines purpose, vision and deliverables
- Final report(s) provide ranked options and recommendations
- Term for one year
- City Manager/City Attorney (or designee) serve as Staff Liaisons
- Chair/Vice Chair
- Meet as needed
- Membership from existing Boards and Commissions

1. Citizens Finance Advisory Commission
2. Open Lands and Trails Advisory Commission
3. Police Citizens Advisory Board
4. Human Services Commission
5. Library Board



City of Loveland

City of Loveland

Public Comment & Council Questions

Thank you for your time and consideration.

Why & What

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City of Loveland