



TOWN HALL PO Box 10 | 201 N. Railroad Street | Ridgway, Colorado 81432 | 970.626.5308 | www.town.ridgway.co.us

Town of Ridgway

Housing Action Plan 2026

Request for Proposals

TOWN OF RIDGWAY
Request for Proposals
for Housing Action Plan

Notice is hereby given that the Town of Ridgway, Colorado will receive proposals from qualified, professional consultants to develop a Housing Action Plan (“HAP”) for the Town of Ridgway.

Two paper copies and one electronic copy of the proposal in a sealed envelope clearly marked “Housing Action Plan” and the name, address and phone number of the proposer must be received by Pam Kraft, Town Clerk at Ridgway Town Hall, 201 N. Railroad Street, or PO Box 10, Ridgway, CO 81432 **by 4:00 pm on Tuesday, February 24, 2026**. Any proposals received after said date/time will be returned unopened.

Owner reserves the right to reject any and all proposals, to waive any and all informalities and to negotiate contract terms with the successful proposer, or to accept the proposal for the contract, which in Owner’s judgement best serves the interest of the Town of Ridgway. Owner reserves the right to disregard all non-conforming, non-responsive, or conditional proposals.

The full Request for Proposals (“RFP”) can be viewed at <https://www.colorado.gov/pacific/ridgway/requests-proposals-bids>.

By: Pam Kraft, Town Clerk

Publication: Ouray County Plaindealer – February 5, 2026

SCOPE OF SERVICES

Project Goals

Consultant will develop a Housing Action Plan (HAP) to complement the recently completed [Town of Ridgway & Ouray County Housing Needs Assessment](#). As outlined in Colorado Revised Statutes (C.R.S.) §24-32, “A Housing Action Plan must be responsive to an accepted Housing Needs Assessment and demonstrate the local government's commitment to address demonstrated housing needs and guide the local government in developing legislative actions, promoting regional coordination, and informing the public of the local government's efforts to address housing needs in the local government's jurisdiction.”

The purpose of the HAP will be to:

- Operationalize a Housing Needs Assessment by turning analysis into action.
- Create accountability by setting measurable goals and methods for tracking progress.
- Develop strategies to fill gaps in housing availability and affordability inclusively, broadening options and access to opportunities.
- Present a new unified housing vision of the future of Ridgway.
- Help create a data-informed plan shaped by community input and needs.
- Inform updates to various long-range plans.

The selected Consultant shall consult the *Housing Action Plan Guide for Colorado Communities* that was recently issued by the Colorado Department of Local Affairs and is attached as Attachment A. That document is intended to provide guidance on developing an HAP as required in C.R.S. §24-32-3705, with a focus on State of Colorado Housing Action Plan requirements established by Senate Bill 24-174.

General Project Requirements

All work shall be completed in accordance with applicable standards and within the agreed upon timeline. Completion of the work includes but is not limited to, providing draft research and analysis, delivery of a final HAP, and presentation to the Town Council and stakeholders.

Key Deliverables & Tasks

1. Coordination

Consultant will consult with and report to Town staff and Town Council as directed, and as necessary, provide analysis, strategic advice and recommendations on draft findings and analysis. Consultant will also perform all administrative functions related to scheduling meetings and events and coordinating stakeholder and advisory groups on behalf of the Town, and provide email, verbal, and written communication, as well as any necessary event planning for appropriate meetings and other functions.

2. Communication

Consultant will provide accurate and timely information and counsel to Town officials and staff, including bi-weekly project updates, and will participate in regular and intermittent meetings as desired. Consultant must conduct an inclusive public outreach and engagement process.

3. Housing Action Plan

Consultant will develop an HAP for the Town that fulfills the statutory requirements described in SB 24-174 and that meets the guidance identified in the *Housing Action Plan Guide for Colorado Communities*. The HAP must include the following baseline components:

- Summary report of the local government's progress toward addressing the findings of the applicable Housing Needs Assessment (C.R.S. 24-32-3705(3)(a)).
- Description of how the local government's Housing Action Plan addresses regional housing needs allocations, if applicable (C.R.S. 24-32-3705(3)(b)).
- Assessment of the effects of the local government's existing zoning and density on housing development (C.R.S. 24-32-3705(3)(c)).
- A plan to promote equitable and efficient development of housing identified in a Housing Needs Assessment to satisfy housing needs at different income levels (C.R.S. 24-32-3705(3)(d)).
- A narrative analysis of any area that the local government has identified as being at elevated risk of displacement (C.R.S. 24-32-3705(3)(f)).
- Locally-appropriate goals, strategies, and actions for promoting the production and preservation of affordable housing development and regulated affordable housing, including at least two standard and one long-term affordability strategies (C.R.S. 24-32-3705(3)(e)).
- A plan to mitigate displacement, including at least one displacement mitigation strategy (C.R.S. 24-32-3705(3)(f)).
- A plan for the legislative consideration for adoption of the affordability and displacement mitigation strategies identified (C.R.S. 24-32-3705(3)(g)).
- Recommended modifications to local zoning to be conducted before the next Housing Action Plan (C.R.S. 24-32-3705(3)(h)).
- Analysis of opportunities to achieve the development of higher-density and regulated affordable housing within a reasonable distance of major transit stops (C.R.S. 24-32-3705(3)(i)).
- A narrative of the public outreach and engagement process for the Housing Action Plan (C.R.S. 24-32-3705(3)(j)).

- A description of opportunities for intergovernmental coordination to address local and regional housing needs (C.R.S. 24-32-3705(3)(k).

Project Management

Consultant shall prepare and submit to the Town for approval a project management plan that specifies a schedule of work; details the roles and responsibilities of Consultant and sub-contractors; identifies work tasks, milestones, and review/comment milestones; and a public outreach plan. Consultant will participate in meetings at least twice a month with the Town's Project Manager and meetings with specific departments, key stakeholders, and outside agencies, as necessary. Consultant will prepare meeting agendas and keep meeting notes.

Board Meeting Presentations

Consultant should plan to make a presentation at a meeting of the Town Council. Consultant will develop and submit a schedule as part of the proposal for obtaining input from elected and appointed officials. Consultant should plan to take the lead role in all study sessions and meetings with elected and appointed officials. Town staff shall be available to Consultant in a supporting role during the period. Consultant shall be responsible for creating meeting notes from each meeting, summarizing responses and comments provided by elected and appointed officials.

Oversight

A designated individual will be responsible for management of the contract for the Town ("Project Manager"). The Town will provide reasonable assistance to Consultant in the scheduling of meetings, interpretation of policy and procedural requirements, research relating to internal documents, coordination with outside agencies and staff, but the Town's obligation will not limit Consultant's obligations to perform the Services. The Town will rely on the personnel, experience, and expertise of Consultant to ensure all necessary components of the scope of work are completed.

Timeline and Budget

Consultant must complete all deliverables within the agreed-upon schedule and within the limits provided by the executed contract.

Contract Requirements

Consultant will perform all Services in accordance with the executed Professional Services Agreement. Please refer to Attachment B to review a draft Professional Services Agreement that lays out contract requirements, including insurance, indemnification, compensation, termination, and payment standards.

METHOD OF SUBMITTAL AND PROPOSAL FORM

Proposers shall submit two (2) paper copies printed double sided and one (1) electronic copy of the proposal in a sealed envelope, clearly marked with "Housing Action Plan", no later than 4:00 p.m. on Tuesday, February 24, 2026 to:

Ridgway Town Clerk
PO Box 10
201 N Railroad Street
Ridgway, CO 81432

Proposals shall be limited to 20 pages. Proposals should focus on the qualifications and experience in providing the services requested above. A short list of individuals or firms may be developed based upon the proposals submitted. Proposals shall include the following in the order given:

- A. **Cover Letter:** A cover letter indicating the Respondent's interest and identifying the entity or entities submitting the Proposal. The letter should identify the name, address, email address, and telephone number of the person to contact, along with other contact information for those authorized to represent the Respondent. The letter should also include:
 - A signature by a representative of the Respondent authorized to bind the Respondent for the terms proposed.
 - Any criteria expected by the Town that Respondent will not provide.
 - Any proposed changes to the draft Professional Services Agreement (Attachment B).
 - Any other information not appropriately contained in the body of the Proposal.
- B. **Cost Proposal:** A financial proposal focused on maximum value, innovation, and cost-effective implementation. The Cost Proposal should include:
 - **Proposal.** A total not-to-exceed fixed fee for labor, equipment, time, materials, and other items necessary to meet the requirements of the Scope of Services and deliverables, including the requirements of the Professional Services Agreement. The fee should include all costs of performing the Services (including without limitation, mileage, travel, equipment, supplies, subcontractor costs, permits, licenses, overhead, profit, insurance, etc.) Although the Town does not anticipate compensating Respondent for any additional items of expenses, any such additional amounts to be charged to the Town must be identified in the cost proposal. Final pricing terms will be negotiated as part of the agreement following selection.
 - **Detailed Cost Breakdown.** A cost and hourly rate for various job classifications for each task identified in the Scope of Services and the deliverables section of this RFP including an estimate of manpower hours needed to complete the work. All cost assumptions must be clearly documented in this portion of the submittal. A budget for direct expenses, including travel expenses, if any, must be included, but such expenses are not expected to be paid separately. All prices shall be firm and not subject to increase during the period of this contract.

- **Proposed Payment Schedule.** A proposed payment schedule based on pre-established benchmarks. Proposals must show a retainage of at least fifteen percent (15%), payable on completion of all Services (including presentation to the Town Council and final delivery of documents). A final payment schedule will be negotiated as part of the agreement following selection.

C. **Approach to Service:** A detailed description of the approach that will be used to deliver the Services and deliverables. The approach should follow the Scope of Services using a format of primary tasks with subtasks to provide context of the requested/proposed item.

D. **Proposed Project Timeline:** A proposed timeline that identifies milestones, public outreach and elected official presentations, and a completion date, preferably tied to the proposed payment schedule. The timeline should also include information as to how the project milestones will be achieved for each phase of the timeline. A narrative of the approach that will be used to perform the Scope of Services and deliverables within the timeline must be included.

E. **Resume and Qualifications:** A description of the history, experience, and qualifications of the Respondent and any proposed subcontractors to perform the Scope of Services and deliverables. The Town expects that proposed personnel and subcontractors will remain assigned to the Services until completion of all deliverables. Include the following:

- Names and addresses of all firms to be involved in the work
- History, size, and structure of the firm(s)
- Identification of the Principal in Charge, the Project Manager, and the roles and responsibilities of each as they relate to the Project. Include relevant experience and copies of resumes of all personnel to be assigned to the work. If any aspect of the project will be subcontracted, please provide the same information for all team members.
- A list of projects currently under contract and being worked on by the Respondent's team.

F. **Example of Previous Work:** Complete examples of similar deliverables that were completed for other jurisdictions.

G. **Potential Conflicts of Interest:** List any work that your firm or your proposed sub-consultants are currently performing for the Town or any other entities within Ouray County.

H. **Miscellaneous:** Any supplemental information and attachments relevant to the Proposal, Respondent's qualifications, or Respondent's approach. Respondents are encouraged to expand upon the specifications to give additional evidence of their ability to provide the Services.

SELECTION AND INTERVIEW PROCESS

The Town's review of proposals will focus in general on the expertise, experience and understanding of the scope of services as evidenced by the proposals. Proposals will be evaluated using the following criteria:

- Qualifications of the individual or team members and their experience with similar projects.
- Understanding or experience with the requested scope of services and working with small local governments with limited resources.
- Time frame for completion of the project.
- Ability of the consultant to complete the work in a cost-effective and timely manner.
- Comprehensive proposal package, including unique and creative technical approaches which are clearly articulated in the proposal that will enhance the project outcomes and deliverables.
- Overall responsiveness to the RFP.
- The degree to which the proposal meets or exceeds the terms of the Request for Proposal.
- Results of reference checks and past performance for other clients.

All proposals will be reviewed and evaluated by a Selection Committee consisting of Town staff member and a member of the Town Council. The Town reserves the right to request clarification or additional information from individual Respondents.

As part of the evaluation process, the Town expects to interview some, but not necessarily all, of the Respondents. If selected for an interview, presentations will be limited in time with additional time for questions. Respondents may also be asked to supplement their submittals as part of the selection process.

TIMELINE

Identified below are the milestone dates associated with this project (subject to change).

<i>RFP Issued:</i>	<i>Monday, January 26, 2026</i>
<i>Proposal Due Date/Opening of Proposals:</i>	<i>Tuesday, February 24, 2026 by 4:00 p.m.</i>
<i>Notifications Re Interview Status</i>	<i>Friday, February 27, 2026</i>
<i>Interviews (in-person or virtually)</i>	<i>Tuesday, March 3, 2026</i>
<i>Final Consultant Selection/Notice of Award:</i>	<i>Wednesday, March 11, 2026</i>
<i>Executed Contract and Required Documents Submitted</i>	<i>Week of March 16, 2026</i>

Project Commences:

Week of March 23, 2026

Desired Project Completion

October 14, 2026

ADDITIONAL INFORMATION

The Town intends to select one consultant to provide the services described herein. The Town reserves the right to accept or reject any or all proposals, to waive any and all informalities and to negotiate contract terms with the successful proposer, or to accept the proposer for the contract, which in its judgement best serves the interest of the Town, and the right to disregard all non-conforming, non-responsive, or conditional proposals.

The Town will work to honor confidentiality requests to the extent possible and reasonable. If you feel certain aspects of your proposal are proprietary in nature, please clearly indicate those specific components in the submittal as the Town is subject to Colorado Open Records Act requests.

For more information about the Town of Ridgway, please visit <https://townofridgway.colorado.gov/>.

ATTACHMENTS

Attachment A – Housing Action Plan Guide for Colorado Communities

Attachment B – Professional Services Agreement

ATTACHMENT A

Housing Action Plan Guide

FOR COLORADO COMMUNITIES



COLORADO

Department of Local Affairs

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Acknowledgements

State of Colorado

Department of Local Affairs, Community Development Office

- Mark Williams, Lead Land Use Technical Assistance Planner
- Eugene Howard, Technical Assistance Unit Manager
- KC McFerson, Senior Planner
- Scott Williamson, Land Use and Water Planner
- Hannah Van Nimwegen, Technical Assistance Planner

Colorado Department of Transportation

- Nathan Lindquist, Land Use Planning

Colorado Energy Office

- Kelly Blynn, Senior Policy Advisor

Technical Content

- Bob Parker, Project Director, ECONorthwest
- Jennifer Cannon, Senior Project Manager, ECONorthwest
- Mary Chase, Project Manager, ECONorthwest
- Natasha Pettit, Communications Manager, ECONorthwest
- Lee Ann Ryan, Policy Advisor, ECONorthwest
- Sarah McClain, President, Western Spaces, LLC

Outreach Participants

Local government staff, community representatives, and other stakeholders provided valuable input on this document to clarify and expand on guidance on effective local and regional Housing Action Plans.

How to Use this Housing Action Plan Guide

This document provides guidance on developing a Housing Action Plan, with a focus on State of Colorado Housing Action Plan requirements established by Senate Bill (SB) 24-174. This Guidebook provides guidance for local governments and regional entities in Colorado developing Housing Action Plans by January 1, 2028, as required in C.R.S. 24-32-3705. These plans must be updated every six years.

Reader's Guide to this Document

Key requirements are **bolded** and demarcated with a ★ (blue star symbol).

Gray boxes marked with an asterisk * show tips and sections that are not requirements. These sections include best practices, and other helpful guidance.

Examples are in light green boxes marked with a double asterisk.**

The document includes various citations to 2024 Colorado Revised Statutes (C.R.S.) Title 24, primarily related to Section 24-32-3705—Housing action plan. More detail regarding the 2024 C.R.S. is available at [Justia Law Colorado Revised Statutes](#)

This guidebook is organized into the following primary chapters:

- [**Chapter 1: Introduction.**](#) Provides background on Housing Action Plans including baseline components, who is required, what is included, and the timing involved with developing one.
- [**Chapter 2: Integration of the Housing Needs Assessment.**](#) Describes the baseline housing needs assessment items.
- [**Chapter 3: Housing Action Plan Public Engagement Guidance.**](#) Explains the public engagement requirements and provides tips on public engagement.
- [**Chapter 4: Housing Action Plan Goals, Strategies and Actions.**](#) Provides guidance on selecting housing goals, strategies, and implementation actions.

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- **Chapter 5: Housing Action Plan Approval, Implementation, and Monitoring.**

Provides guidance on the process of adopting a Housing Action Plan, intergovernmental coordination, and plan implementation and monitoring.

Appendices (in a separate document)

- Appendix A: Housing Action Plan Outline and Tips. This section provides an outline of an example Housing Action Plan and a list of the top 10 tips.
- Appendix B: Definitions, Terminology, and Additional Resources. Defines common housing terms that are not specifically defined in the state legislation and provides an array of different resources that might help provide insights.

This guidebook caters to a diverse audience, ranging from first-time Housing Action Plan drafters through skilled specialists, including:

- Local, regional, and state government staff and officials;
- Housing agencies and authorities;
- Consultants specializing in housing planning;
- Housing providers and developers;
- Community organizations and non-profits invested in housing issues; and
- Residents interested in understanding and supporting local housing initiatives.

CHAPTER 1: INTRODUCTION

This chapter provides background on Housing Action Plans, outlines the baseline components for Housing Action Plans and describes the reasoning for them, what they typically include and the main approaches (such as a regional versus local approach), who is required to develop a them, and the timing involved with developing a Housing Action Plan.

WHAT WILL YOU FIND IN THIS SECTION?

- **Background on Housing Action Plans**
- **Housing Action Plan Baseline Components**
- **Why Develop a Housing Action Plan?**
- **Who Must Complete a Housing Action Plan?**
- **Approaches for Developing a Housing Action Plan**
- **Housing Action Plan Timeline**

Chapter 1: Introduction

This chapter provides background on Housing Action Plans, outlines the baseline components for these plans, describes the reasoning for them, outlines what they typically include and different approaches (i.e., regional versus local approach), elaborates on who is required to develop a Housing Action Plan, and describes the timing involved with developing a Housing Action Plan.

What will you find in this chapter?

- [Section 1.1 Background on Housing Action Plans](#)
 - Housing Action Plan Baseline Components
 - Why Develop a Housing Action Plan?
 - What is Included in a Housing Action Plan?
 - What is the Timeline for Housing Action Planning?
 - Who Must Complete a Housing Action Plan?
- [Section 1.2 Approaches for Developing a Housing Action Plan](#)

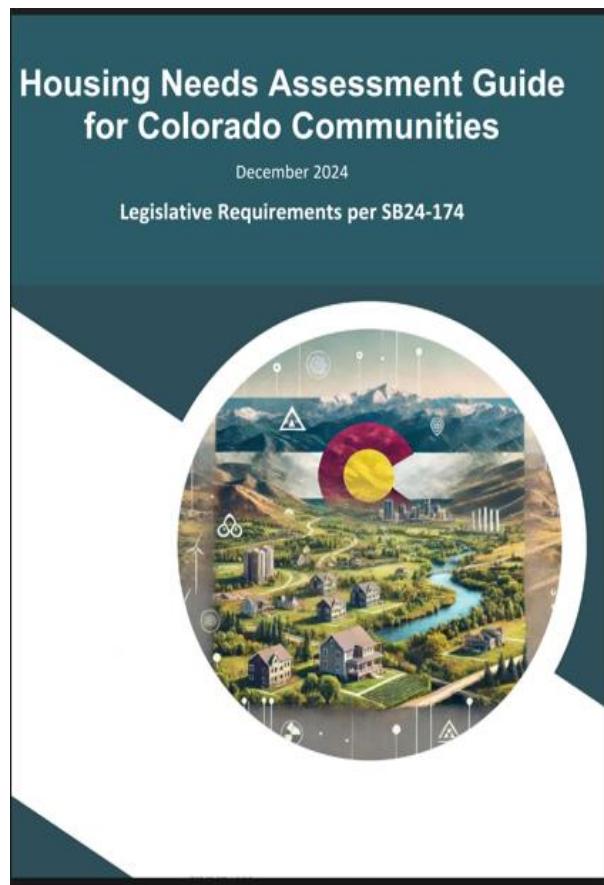
Section 1.1. Background on Housing Action Plans

★ Housing Action Plans are a traditional tool or component of housing needs planning and are now a part of a framework for housing planning in Colorado introduced in 2024 by Senate Bill 24-174. These Housing Action Plans must be completed by January 1, 2028 (C.R.S. 24-32-3705 (1)(a)). These plans are an implementation mechanism that comes after jurisdictions complete a [Housing Needs Assessment](#) to address identified local housing gaps.

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“A Housing Action Plan must be responsive to an accepted Housing Needs Assessment and demonstrate the local government's commitment to address demonstrated housing needs and guide the local government in developing legislative actions, promoting regional coordination, and informing the public of the local government's efforts to address housing needs in the local government's jurisdiction.” (C.R.S. 24-32-3701(1)(a))

Housing Action Plans have specific requirements that jurisdictions must meet called “Baseline Components” (C.R.S. 24-32-3705(3)). These represent the essential building blocks that must be included for a Housing Action Plan, though jurisdictions may choose to include additional analysis, strategies, or components if desired.



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Housing Action Plan Baseline Components

★ A Housing Action Plan must include the following Housing Needs Assessment related baseline components (C.R.S. 24-32-3705(3)).

- Summary report of the local government's progress toward addressing the findings of the applicable Housing Needs Assessment (C.R.S. 24-32-3705(3)(a)). Described under [Section 2.3](#).
- Description of how the local government's Housing Action Plan addresses regional housing needs allocations, if applicable (C.R.S. 24-32-3705(3)(b)). Described under [Section 2.4](#).
- Assessment of the effects of the local government's existing zoning and density on housing development (C.R.S. 24-32-3705(3)(c)). Described under [Section 2.2](#).
- A plan to promote equitable and efficient development of housing identified in a Housing Needs Assessment to satisfy housing needs at different income levels (C.R.S. 24-32-3705(3)(d)). Described in [Section 4.2 \(i\)](#).
- A narrative analysis of any area that the local government has identified as being at elevated risk of displacement (C.R.S. 24-32-3705(3)(f)). Described in [Section 4.2 \(iii\)](#).

A Housing Needs Assessment completed after January 1, 2022, can qualify as having satisfied the initial requirement if submitted to the state no later than December 31, 2024, and if the Department determines that it conforms to the methodology requirements (C.R.S. 24-32-3703).

★ Additional baseline components include the following (C.R.S. 24-32-3705(3)).

- Locally-appropriate goals, strategies, and actions for promoting the production and preservation of affordable housing development and regulated affordable housing, including at least two standard and one long-term affordability strategies (C.R.S. 24-32-3705(3)(e)). See [Section 4.2\(ii\)](#).

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- A plan to mitigate displacement, including at least one displacement mitigation strategy (C.R.S. 24-32-3705(3)(f)). See [Section 4.2\(ii\)](#).
- A plan for the legislative consideration for adoption of the affordability and displacement mitigation strategies identified (C.R.S. 24-32-3705(3)(g)).
Described in [Section 4.2 \(iii\)](#).
- Recommended modifications to local zoning to be conducted before the next Housing Action Plan (C.R.S. 24-32-3705(3)(h)). Described in [Section 4.2 \(iv\)](#).
- Analysis of opportunities to achieve the development of higher-density and regulated affordable housing within a reasonable distance of major transit stops (C.R.S. 24-32-3705(3)(i)). Described in [Section 4.2\(v\)](#).
- A narrative of the public outreach and engagement process for the Housing Action Plan (C.R.S. 24-32-3705(3)(j)). Described under [Section 3.1](#).
- A description of opportunities for intergovernmental coordination to address local and regional housing needs (C.R.S. 24-32-3705(3)(k)). Described in [Section 5.2](#).

Why Develop a Housing Action Plan?

- Operationalizes a Housing Needs Assessment by turning analysis into action.
- Creates accountability by setting measurable goals and tracking progress.
- Develops strategies to fill gaps in housing availability and affordability inclusively, broadening options and access to opportunities.
- Presents a new unified housing vision of the future for a community/region.
- Helps create a data-informed plan shaped by community input and needs.
- Informs updates to various plans such as long range, comprehensive, strategic, transportation, and subarea or master plans.

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What is Included in a Housing Action Plan?



What is the Timeline for Housing Action Planning?

Communities develop Housing Action Plans after Housing Needs Assessments since they provide useful information on trends and existing actions as well as current and future housing needs.

★ C.R.S. 24-32-3705(1)(a) states that: “A housing action plan must be responsive to an accepted housing needs assessment and demonstrate the local government's commitment to address demonstrated housing needs and guides the local government in developing legislative actions, promoting regional coordination, and informing the public of the local government's efforts to address housing needs in the local government's jurisdiction.”

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- **Housing Action Plans must be responsive to an accepted Housing Needs Assessment (C.R.S. 24-32-3705 (1)(a)).**
- **Housing Action Plans must be completed by January 1, 2028 (C.R.S. 24-32-3705 (1)(a)).**
- **Housing Action Plans are subject to approval by the governing body following a public hearing.**

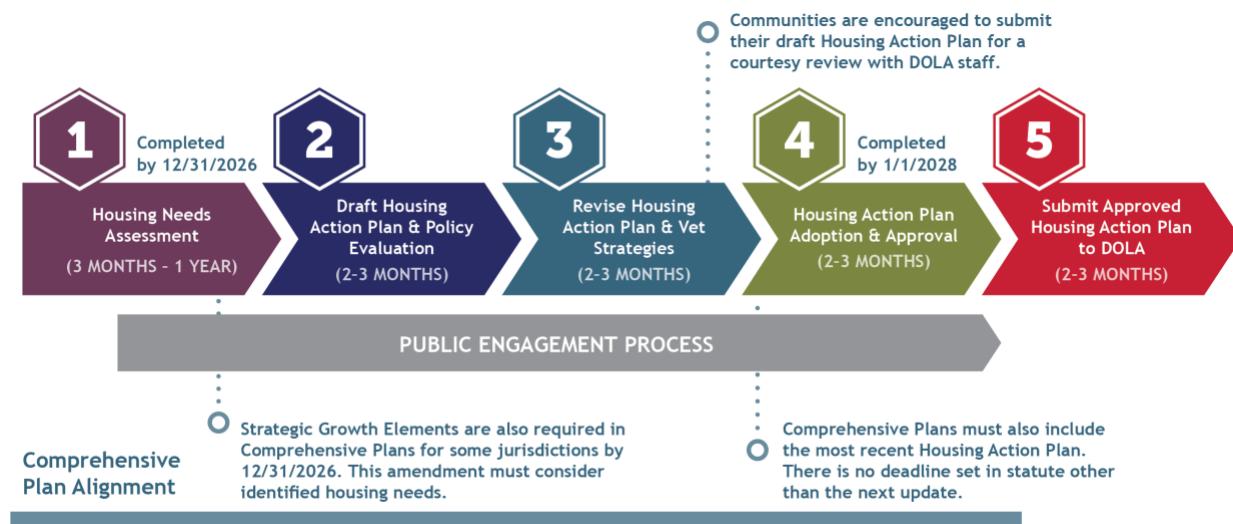
The timing associated with the key elements of a Housing Action Plan and Housing Needs Assessment can vary as outlined below.

- A **Housing Needs Assessment** can take three months to one year to complete. Local governments who meet the [criteria](#) of SB 24-174 must complete Housing Needs Assessments by **December 31, 2026**.
- A **Housing Action Plan** can take between six and nine months to complete including the approval and adoption of the plan. Drafting policies can take two to three months, followed by two to three months of revising and vetting strategies. A Housing Action Plan produced for a region can take longer to finish compared to a Housing Action Plan for one local government. Adoption and approval can typically take an additional two to three months. Housing Action Plans must be approved and adopted by **January 1, 2028**.
- **Public engagement** for the Housing Action Plan typically begins with the Housing Needs Assessment and continues throughout the Housing Action Plan.
- Communities are encouraged to submit their draft Housing Action Plan for a **courtesy review with DOLA staff** before the final Housing Action Plan adoption and approval with the respective local governing board.
- Local governments can also structure the Housing Needs Assessment and Housing Action Plans process to streamline **Comprehensive Plan** updates. By **December 31, 2026**, some communities must include a Strategic Growth Element in their Comprehensive Plan, which must address demonstrated housing needs. (Note: DOLA guidance for Strategic Growth Elements to be released in late 2025)

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The example timeline below outlines these basic steps with developing a Housing Needs Assessment and Housing Action Plan and the maximum time it could take (approximately two years). Local governments are encouraged to begin work as far in advance of deadlines as feasible depending on capacity and resources.

Example Timeline for Housing Needs Assessments and Housing Action Plans



Integration of Housing Action Plans and Comprehensive Plans

Strategic Growth Elements are a new requirement of Comprehensive Plans for some local governments which must “**address demonstrated housing needs**” (C.R.S. 30-28-106(3)(a.5)(III) / C.R.S. 31-23-206(1.5)(d)). Comprehensive Plans must include new requirements **no later than December 31, 2026** (C.R.S. 30-28-106(3)(a.7)(I) / C.R.S. 31-23-206(1.7)(a)). Strategic Growth Elements must also be updated every five years. DOLA will release further guidance on [Strategic Growth Elements](#) in late 2025.

Municipal and county comprehensive plans must also **include “the most recent housing action plan or plans adopted by the county or municipalities within the region”** (C.R.S. 30-28-106(3)(a.5)(IV) / C.R.S. 31-23-206(1.5)(e)). There is no legislative requirement for when municipalities and counties must update comprehensive plans to include Housing Action Plans, although in practice it is likely to be the next Comprehensive Plan update after adoption of the Housing Action Plan.

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Who Must Complete a Housing Action Plan?

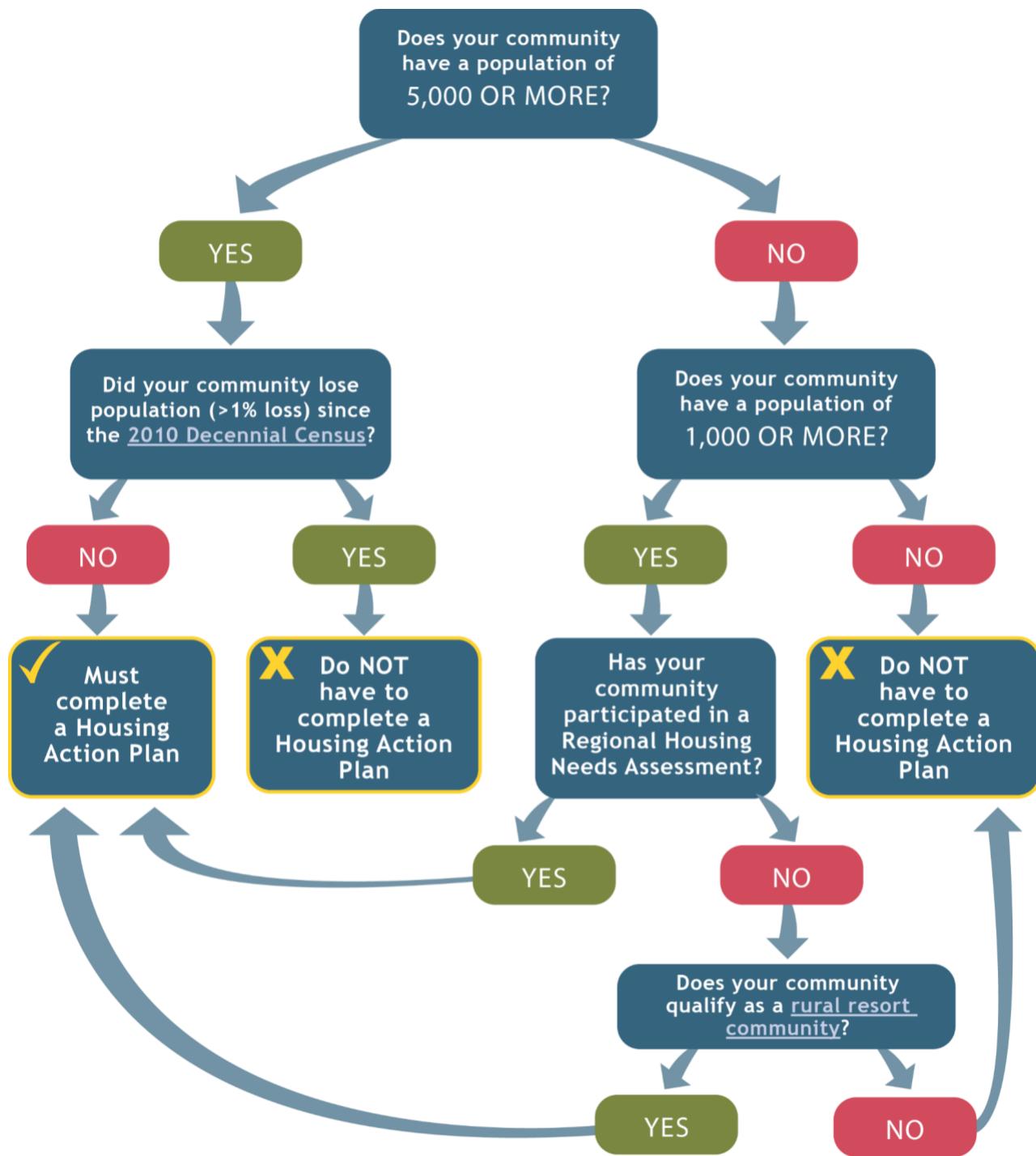
Not all local jurisdictions in the State of Colorado are required to complete a Housing Action Plan. Those who meet the criteria of SB 24-174 outlined below must at a minimum comply with the baseline components of a Housing Action Plan.

★ Housing Action Plans are required for the following local governments (C.R.S. 24-32-3705(1)(b):

- With populations of 5,000 or more;
- With populations of 1,000 or more that participated in a Regional Housing Needs Assessment; or
- With populations of 1,000 or more and deemed “rural resort communities” (as of January 1, 2024, and defined in C.R.S. 29-32-101(10)).

Housing Action Plans are not required for local governments that saw a one percent population loss or more since the last Decennial Census.

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C.R.S. 24-32-3701 (7) defines "Local Government" as a home rule, territorial, or statutory county, city and county, city, or town. See the flowchart to determine if the requirements from SB 24-174 apply.

DOLA's [Multilaw Applicability Tool](#) also allows jurisdictions to check if requirements of SB 24-174 for Housing Action Plans and other recent state legislation apply locally.

★ SB 24-174 also describes future eligibility of local governments that are required to develop a Housing Action Plan. A local government should review the eligibility requirements under C.R.S. 24-32-3705(1) two years prior to the date when a Housing Action Plan must be completed to determine whether they must complete a Housing Action Plan (C.R.S. 24-32-3705(8)).

Additional Resources

- [C.R.S. 24-32-3705](#): State statute that defines Housing Action Plan requirements.
- [DOLA Housing Needs Assessment Guidance](#)
- [State Demography Office Population Resources](#): Resources for checking current population and change over time for eligibility.
- [Rural Resort Community Information](#): Detail on definition and eligibility for rural resort community status. [Verify your community classification with DOLA](#).
- [Multi-law applicability map](#): This is a DOLA resource to find out the applicability of state legislative requirements for local governments.

Section 1.2 Approaches for Developing a Housing Action Plan

Approaches for developing a Housing Action Plan vary according to each jurisdiction's unique circumstances. Jurisdictions with an existing Housing Action Plan should complete an update if it does not meet state requirements or if the strategies are no longer relevant. **Jurisdictions can get credit for previous Housing Action Plan strategy efforts or applicable housing planning strategies already underway, as**

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long as they remain relevant. Any approach can involve a consultant team hired by a local government to provide extra support and technical expertise.

Another early consideration is whether to develop a local or regional Housing Action Plan. Some jurisdictions opt to partner with other jurisdictions in a region while others choose to approach their Housing Action Plan independently.

Housing Action Plan Local Approach: Local governments tailor the jurisdiction's goals, strategies, and actions to address local housing needs to community conditions.

Housing Action Plan Regional Approach: A collaborative effort designs a plan to address housing challenges across multiple jurisdictions within a defined region. The Housing Action Plan must clearly specify the goals and strategies relevant to each local jurisdiction and should provide the Housing Action Plan baseline components separately for each local jurisdiction.

The following section highlights characteristics and considerations associated with using a regional versus a local approach for developing a Housing Action Plan. As shown, each approach offers unique advantages and challenges and considerations.

Local Versus Regional Housing Action Plan Considerations and Tips

Element	Local Approach	Regional Approach
Who	Typically led by local government, with leadership from internal departments. Adoption generally involves review by a planning commission and formal approval by a city council or county commission.	Designate a lead entity to oversee coordination such as a county. The lead often convenes a group of local governments that jointly contribute resources, staff time, or funding. The plan must be adopted by the governing board of each local jurisdiction.

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Element	Local Approach	Regional Approach
Timing	Often quicker since it involves fewer stakeholders and can move through a single jurisdiction's decision-making process.	Often requires more time due to the need to engage a broader set of stakeholders and navigate varying local priorities and local government boards.
Costs	Generally, requires a smaller investment , reflecting a narrower geographic scope and fewer stakeholders. When multiple local jurisdictions pursue independently, the cumulative cost can be larger .	Typically involves a higher upfront investment when compared to a local plan due to broader engagement, coordination needs, and more complex analysis. Can reduce costs when jurisdictions pool resources and share consultant services.
Benefits	Tailored solutions, faster development and approval, stronger local engagement.	Economies of scale, coordinated action on shared housing needs, stronger policy leverage, shared tools and data.
Challenges	Limited resources, narrower focus on regional issues, political constraints.	Complex coordination, diverse needs, longer timeline.
When to Pursue	When a jurisdiction has distinct housing needs, priorities, and strategy needs, and when coordination with neighboring jurisdictions is less critical.	When neighboring jurisdictions experience interconnected housing challenges and are motivated to collaborate. Best when an existing regional structure can facilitate coordination and resource sharing.

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*Tips for Getting Started with Housing Action Planning**

Early on, it can be helpful to take the following steps before getting started:

- Review previously completed housing studies/plans relevant to the area, assess existing conditions, identify challenges and opportunities for a community, and work out how to get in front of hot-button topics.
- Build familiarity with housing action planning and the variations and depth.
- Identify those most impacted by housing needs and strategies (including those at risk of displacement).

CHAPTER 2:

INTEGRATION OF THE HOUSING NEEDS ASSESSMENT

This chapter provides guidance on integrating Housing Needs Assessment information into a Housing Action Plan, outlines the baseline components including the need for an assessment of the existing conditions and the zoning effects on housing development, summary of progress to address Housing Needs Assessment findings, and an assessment for addressing regional housing (if applicable).

WHAT WILL YOU FIND IN THIS SECTION?

- **Baseline Housing Needs Components in a Housing Action Plan**
- **Summary of Existing Conditions**
- **Assess Existing Zoning and Density Effects on Housing Development**
- **Summary of Progress to Address Housing Needs Assessment Findings**
- **Addressing Regional Housing (if applicable)**

Chapter 2: Integration of the Housing Needs Assessment

This chapter provides guidance on integrating Housing Needs Assessment information into a Housing Action Plan. It outlines the baseline components including an assessment of the existing conditions the zoning effects on housing development, summary of progress to address Housing Needs Assessment findings, an assessment for addressing regional housing (if applicable), and narrative analysis of areas with elevated risk of displacement.

What will you find in this chapter?

- [Section 2.1 Summary of Existing Conditions](#)
- [Section 2.2 Assess Existing Zoning and Density Effects on Housing Development](#)
- [Section 2.3 Summary of Progress to Address Housing Needs Assessment Findings](#)
- [Section 2.4 Addressing Regional Housing \(if applicable\)](#)

Baseline Housing Needs Components in a Housing Action Plan

★ Pursuant to C.R.S. 24-32-3705(3)), a Housing Action Plan must include four Housing Needs Assessment-related baseline components:

- Summary report of the local government's progress toward addressing the findings of the applicable Housing Needs Assessment (C.R.S. 24-32-3705(3)(a)). [Described under Section 2.3.](#)
- Description of how the local government's Housing Action Plan addresses regional housing needs allocations, if applicable (C.R.S. 24-32-3705(3)(b)). [Described under Section 2.4.](#)
- Assessment of the effects of the local government's existing zoning and density on housing development (C.R.S. 24-32-3705(3)(c)). [Described under Section 2.2.](#)

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- A plan to promote the equitable and efficient development of housing identified through the Housing Needs Assessment to satisfy housing needs at different income levels (C.R.S. 24-32-3705(3)(d)). (C.R.S. 24-32-3705(3)(d)). [Described under Section 2.1.](#)
- A narrative analysis of any area that the local government has identified as being at elevated risk of displacement (C.R.S. 24-32-3705(3)(f)). [Described under Section 4.2\(iii\).](#)

A Housing Needs Assessment completed after January 1, 2022, can qualify as having satisfied the initial requirement if submitted to the state no later than December 31, 2024, and if the Department determines that it conforms to the Housing Needs Assessment methodology requirements (C.R.S. 24-32-3703).

A Housing Action Plan is recommended to build on the work completed in a Housing Needs Assessment rather than duplicating efforts by focusing on the required additional analyses and creating clear connections between Housing Needs Assessment findings and the selected plan strategies.

Bridging from Housing Needs to Housing Action

The Housing Action Plan builds on the Housing Needs Assessment by focusing on developing actions to help meet housing needs. This section helps to translate the Housing Needs Assessment findings into a structure for action. The Housing Needs Assessment provides the "what" regarding housing needs while the Housing Action Plan provides the "how."

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*Housing Action Plan Best Practices***

While local governments are only responsible for baseline components of Housing Action Plans, there are several overarching best practices that jurisdictions may follow to ensure that plans are effective and responsive to community needs such as:

- **Focus on Implementation:** Synthesizing analytic findings into actionable insights that will drive strategy development
- **Connect to Community Priorities:** Tie housing needs to other community priorities like economic development, transportation, and sustainability to build broader support
- **Keep it Concise:** Focus on critical findings that drive action, with detailed data in appendices for reference
- **Be Data-Driven:** Ground the summary of findings in specific data, using charts, graphs, and maps to illustrate key points



Focus on Implementation



Connect to Community Priorities



Keep it Concise



Be Data-Driven

★ A Housing Needs Assessment should conclude with recommended policy and programmatic responses pursuant to C.R.S.24-32-3702(1)(e)(I). The Housing Action Plan builds on these recommendations by selecting specific strategies and developing an implementation approach. (See [Chapter 4](#) for more information.)

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What is Generally in a Housing Needs Assessment

- Broad policy recommendations to address identified housing needs
- Programmatic responses to housing gaps and challenges
- Recommendations related to displacement risk
- Broad direction on potential housing approaches

What to Build on from a Housing Needs Assessment in a Housing Action Plan

1. **Prioritization and refinement:** Assess which recommendations in the Housing Needs Assessment may be refined and prioritized. This can be based on local conditions, capacity, public engagement findings, funding availability, and various other considerations.
2. **Connection to directory strategies:** Create a clear crosswalk between Housing Needs Assessment recommendations and specific strategies from the Department's affordability and displacement mitigation strategy directories (C.R.S. 24-32-3706). These provide a list of approved strategies for standard and long-term affordability as well as displacement mitigation provided in [Section 4.2\(iii\).](#)
3. **Determine Gaps in the Housing Needs Assessment Strategies:** Identify areas of possible gaps in the Housing Needs Assessment recommendations, especially those not meeting state requirements.

Section 2.1. Summary of Existing Conditions

This section summarizes the housing-related plans, policies, programs, and tools currently in place within a jurisdiction. This inventory provides critical context to ensure new actions build on existing efforts without replicating work.

★ Pursuant to C.R.S. 24-32-3705(2), the Housing Action Plan “must consider any applicable housing needs assessments, applicable regional and local plans, and any available assessments of the adequacy of public services and public facilities in the local government’s jurisdiction.” To meet this

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requirement, the Housing Action Plan should include a summary of housing-related conditions, including relevant policies, programs, tools, and planning efforts already in place.

This helps demonstrate how the plan aligns with and builds upon prior work, rather than duplicating efforts. The Housing Action Plan may also reference regional housing, transportation, or economic development plans influencing local housing strategies if the jurisdiction participates in a regional planning effort with a Metropolitan Planning Organization, Council of Governments, or other regional entity.

A Housing Needs Assessment may already include a general overview of existing housing-related resources and programs in a jurisdiction. Housing Action Plans may easily reference sections in a Housing Needs Assessment with relevant information for this requirement such as:

- Inventory of regulated affordable housing
- Overview of existing housing programs (e.g., homebuyer assistance, rehabilitation programs) and assessment of local funding resources
- Information on supportive services and homelessness prevention resources
- Catalog of publicly owned land suitable for housing

What to Add to the Existing Conditions Section

★ If these elements were not already fully captured in the Housing Needs Assessment, the Housing Action Plan should supplement the analysis with the following details to satisfy the requirements of C.R.S. 24-32-3705(3)(d):

- **Comprehensive inventory of local plans:** Local governments may inventory relevant elements from different sources including an adopted comprehensive plan, any standalone housing or affordable housing plans, neighborhood or small area plans with housing components, and Three Mile Plans (for municipalities) could be inventoried.). This section of the Housing Action Plan can describe the alignment with other key community plans such as economic

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development plans, transportation and transit plans, sustainability and climate action plans, public facilities and capital improvement plans.

- **Summary of existing housing policies:** These may include a variety of existing policies like inclusionary housing ordinance or incentives, affordable housing development incentives (e.g., parking reductions, expedited permitting), short-term rental policies and rental registration programs, or anti-displacement measures (e.g., tenant protections).
- **Evaluation of existing housing programs and tools:** This evaluation can document metrics like program reach and effectiveness, gaps in services or populations served, relationship to identified housing needs, opportunities for expansion or improvement
- **Review of local housing resources:** A review of resources may cover local housing funds or dedicated revenue sources, publicly owned land available for housing, and partnerships with housing authorities, land trusts, or nonprofits.

Synthesis and Integration Approach Tips*

Effective Housing Action Plans do not start from scratch but build upon existing plans, policies, and programs. Use this analysis to:

- Identify alignment opportunities: How do existing plans support local housing goals?
- Highlight policy gaps: What types of housing needs are not addressed by current policies?
- Evaluate program effectiveness: Which programs are working well and which need modification?
- Assess implementation capacity: What resources and partnerships already exist to support housing initiatives?

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Program Evaluation Example**

Town A currently operates three housing programs:

1. A homebuyer assistance program serving 20-25 households annually at 80-120% Area Median Income (AMI)
2. A home repair program serving 15-20 senior homeowners annually
3. A local housing voucher program serving 30 households below 50% AMI

While these programs are generally well-administered, they predominantly serve moderate-income homeowners and very low-income renters, with few options for more diverse housing needs such as needs for smaller housing. The Housing Needs Assessment identified significant housing needs among renter households earning 50-80% AMI indicating a potential gap in our current program offerings.

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*Sample Matrix: Mapping Housing Needs to Existing Resources***

This matrix visualizes how current programs and policies address housing needs and where gaps exist. Jurisdictions may customize their approach based on a community's specific needs and resources.

Identified Housing Needs	Relevant Existing Plans	Relevant Current Policies	Relevant Existing Programs	Resource Availability	Gap Assessment
 Rentals for households at 30 -50% AMI	Housing Element identifies need, but no specific plan	None	Housing authority voucher program (limited)	Minimal local funding; some LIHTC capacity	 Significant gap; need for new affordable production incentives
 Senior housing options	Aging in place strategy in Comp Plan	ADU ordinance allows for accessory units	Home Modification Program	Limited funding for accessibility modifications	 Moderate gap; need for more accessible units
 Starter homes for young families	Comp Plan goal to increase home-ownership	None	First-time homebuyer assistance (limited funds)	Down payment assistance fund nearly depleted	  Major gap; need more entry-level options

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By thoroughly assessing existing housing plans, policies, programs, and tools, a jurisdiction can establish the foundation upon which a Housing Action Plan will build. This assessment helps ensure that new strategies complement and strengthen existing efforts rather than duplicating or conflicting with them.

Section 2.2. Assess Existing Zoning and Density Effects on Housing Development

Housing Needs Assessments commonly include a general assessment of regulatory barriers. The Housing Action Plan requires a more detailed analysis of how existing zoning affects housing development. Many Housing Needs Assessments include a high-level review of regulatory conditions such as a general assessment of the regulatory environment affecting housing development, analysis of development costs and market limitations, and an overview of infrastructure constraints. A jurisdiction with identified Neighborhood Centers or Transit Centers would likely include zoning analysis helping to meet this requirement.

★ Pursuant to C.R.S. 24-32-3705(3)(c) Housing Action Plans must include:
“An assessment of the effect of existing zoning and density permitted in the local government's jurisdiction on the development of the number and types of dwelling units identified in the applicable housing needs assessment”

What to Add to the Zoning/Density Effects Section

To meet the statutory requirements and lay the groundwork for housing strategies, a Housing Action Plan should expand on the zoning analysis in the Housing Needs Assessment to describe the effects of the existing zoning and density permitted on the development of housing units, as described below.

- **Zoning Capacity Analysis:** Assess how current zoning affects the ability to develop the unit types and quantities identified in the Housing Needs

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Assessment. This can include, for example: total acreage zoned for residential use, maximum allowable densities, assumed development potential under current zoning, and the feasibility for more diverse housing (such as small housing, duplexes, cottage housing, and multifamily housing types).

- **Transit Oriented Communities Implementation Impact:** If the subject jurisdiction is implementing or exploring Transit Oriented communities zoning or similar reforms, describe: which areas are affected, how these changes will affect residential zoning capacity, and the remaining regulatory gaps that may limit effectiveness. (Jurisdictions subject to these requirements are limited to [certain circumstances](#)).
- **Regulatory Barrier Identification:** Highlight zoning regulations that may limit housing production or diversity, such as minimum lot sizes, building height, parking requirements, and restrictions on multi-unit or attached housing.

Tip for Right-Sizing the Zoning Analysis Approach*

The depth of the zoning analysis can be scaled appropriate to a community's size and capacity. While larger communities might use GIS and detailed zoning capacity modeling (like TOC requirements), smaller communities can use a simpler approach:

- Create a table listing each zone district, permitted housing types, and approximate acreage.
- Identify three to five key regulations that may limit housing development (lot sizes, setbacks, etc.).
- Provide estimated allowed densities based on dwelling units per acre, minimum lot sizes, and other key dimensional standards.
- Focus analysis on downtown and areas near services where housing might be most appropriate.

TOC resources: DOLA [Transit-Oriented Communities](#). Note: GIS maps can be shared with DOLA through the portal during the final submission of the Housing Action Plan.

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Section 2.3. Summary of Progress to Address Housing Needs Assessment Findings

Another required section of a Housing Action Plan is to provide a summary of recent housing development activity. This section begins to establish a performance baseline for future planning cycles.

★ Pursuant to C.R.S. 24-32-3705(3)(a), Housing Action Plans must include: “A summary report of the local government's progress toward addressing the findings of the applicable housing needs assessment within the local government's jurisdiction. The summary report must include the number of dwelling units constructed or permitted in the local government's jurisdiction during the preceding six years, if such information is available.”

For communities completing their first Housing Needs Assessment under SB 24-174, this section focuses less on “progress” and more on establishing baseline housing development conditions. This can consider previous findings from a completed Housing Needs Assessment or Housing Action Plan.

★ **The Housing Action Plan must still:**

- Report the number of units constructed or permitted in the past six years, if data is available. (For example, this can include building permit trends by housing type, affordability level, or inventory by unit type or bedroom count.)
- Use this data to reflect on how recent development has generally aligned with the housing needs now identified in the Housing Needs Assessment.
- Lay the groundwork for future performance reporting based on this information

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What Housing Needs Assessment Tracking Must be Added to a Housing Action Plan

★ To satisfy the statutory requirement and establish a foundation for future tracking and monitoring, a Housing Action Plan should include:

- **Six-Year Timeframe Focus:** Specifically examine housing units constructed or permitted during the preceding six years (this specific timeframe is required by statute) including: total units permitted and constructed, unit types (e.g., single-family, multifamily), tenure, if known (rental vs. ownership), and affordability levels, if available (e.g., market-rate vs. income-restricted).
- **Development Alignment Assessment:** Evaluate how recent development has met, exceeded, or fallen short of the housing needs identified in the Housing Needs Assessment. Consider: Which income levels have been served or underserved? What housing types were added (e.g., family-sized units, ADUs, senior housing)? Where did development get built in the jurisdiction?
- **Connection to Outcomes:** Reflect on how past development activity may have been shaped by local programs or policies. Avoid duplicating the inventory of existing tools and instead focus on their observable results.

Section 2.4. Addressing Regional Housing

If a jurisdiction participated in a regional Housing Needs Assessment, SB 24-174 requires the Housing Action Plan to describe how it will respond to the housing needs allocated to the community. The regional allocation can represent a jurisdiction's share of the broader housing needs identified across the region and is intended to support coordinated, equitable growth.

★ “A description of how the local government's housing action plan addresses the allocation of regional housing needs to the local government in any applicable regional housing needs assessment.”
(C.R.S. 24-32-3705(3)(b))

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A regional Housing Needs Assessment, likely includes:

- Output Table 3 ([Housing Needs Assessment Guide](#)): "Allocation of Existing and 10-Year Projected Housing Needs" with a jurisdiction's allocation of regional housing needs.
- Narrative explanation or methodology appendix describing how allocations were determined (e.g., based on job access, land capacity, transit availability, or equitable distribution principles).

What Regional Housing Information Must be Added to a Housing Action Plan?

To meet the requirement of connecting regional planning to local action, the Housing Action Plan should describe how strategies are aligned with housing needs and will be implemented, as elaborated below.

★ Strategy Alignment: Describe how the selected Housing Action Plan strategies will help meet the jurisdiction's allocated housing needs. This may include:

- Reference to specific unit targets by income level, if included in the allocation.
- Cite whether the strategy emphasizes production, preservation, or a mix.
- If applicable, note how the plan supports regional goals like reducing Vehicle Miles Traveled or improving housing choice.

★ Implementation Approach: Explain how the jurisdiction will track progress toward the regional allocation over time. This may include:

- Indication of how often strategies will be reviewed against local targets.
- Identification of responsible entities or departments.
- Any coordination with a Council of Governments, Metropolitan Planning Organization, or regional partners

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★ **Capacity Assessment:** Evaluate whether the jurisdiction has the land, infrastructure, and staffing capacity to accommodate its share of regional housing needs. This may include:

- Discussion of any local limitations (e.g., water, sewer, transportation) (Refer to the Water Supply Element in the local comprehensive plan and the water needs analysis in the Housing Needs Assessment to evaluate whether water availability aligns with housing capacity and identify any gaps)
- Explanation of how the jurisdiction will overcome barriers through zoning, intergovernmental collaboration, or funding partnerships

*Insights from the Housing Needs Assessment Guidance**

The Housing Needs Assessment Guidelines (2024) encourage regional planning efforts to:

- Use equity-informed allocation methodologies, factoring in where housing opportunities are lacking today.
- Clearly document the basis for assigning housing units to each jurisdiction.
- Provide flexibility for jurisdictions with capacity or infrastructure challenges, as long as they propose a plan to address those gaps over time.

"Each participating jurisdiction must clearly demonstrate how their Housing Action Plan will contribute to meeting the collective regional need, while also acknowledging local constraints and opportunities."—[Housing Needs Assessment Guidance](#), Regional Coordination Section

CHAPTER 3:

HOUSING ACTION PLAN PUBLIC ENGAGEMENT GUIDANCE

This chapter provides guidance on engaging the public to help shape the Housing Action Plan development. The requirements for public engagement and tips on who to engage and best practices are provided in this section. This information is important since SB 24-174 requires jurisdictions to integrate public engagement as a part of the development of the Housing Action Plan.

WHAT WILL YOU FIND IN THIS SECTION?

- Public Engagement Requirements
- Who to Engage?

Chapter 3: Housing Action Plan Public Engagement Guidance

This chapter provides guidance and tips on engaging the public to shape the Housing Action Plan development. This information is important since SB 24-174 requires jurisdictions to integrate public engagement as a part of the development of the Housing Action Plan.

What will you find in this chapter?

- [Section 3.1 Public Engagement Requirements](#)
- [Section 3.2 Who to Engage](#)

★ According to C.R.S. 24-32-3705 (2), “a local government shall make a housing action plan through an inclusive process with public outreach and engagement throughout the process, including outreach to and engagement of communities at risk of displacement and consideration for participation by persons unable to attend meetings in person or at the local government's regular meeting times.”

Section 3.1. Public Engagement Requirements

- ★ A key requirement is to integrate public engagement early and continuously throughout the plan development process. Public engagement typically provides opportunity for public input and comments to support the development of the Housing Action Plan.
- ★ Another key requirement is to implement inclusive engagement that integrates outreach to communities at risk of displacement and consideration for persons unable to attend meetings in person or at regular times. To meet this requirement, diverse engagement activities may include activities that allow for people to join virtually in addition to in-person and to offer different dates and times outside of the regular local government

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meeting scheduling. Engagement approaches may also target communities at risk of displacement.

★ **Lastly, public engagement activities, generally who participated, when activities occurred, and the themes from the input should be documented in the Housing Action Plan.** Themes related to housing needs and challenges, suggestions on strategies, and other input shaping the Housing Action Plan can be added to this documentation. Summarizing input regarding common themes, preferences, and considerations can be informative to the plan development.

When to Engage During the Plan Development Process?

Early on in the Housing Action Plan process, jurisdictions can structure the timing for different public engagement activities, considering how to integrate public engagement activities alongside project milestones (such as learning about housing challenges and needs, prioritizing actions) throughout the plan development process. Doing this will help gain input to support the development of the Housing Action Plan and can also build more community support for the plan.

The local knowledge gained from people in a community is crucial for understanding the on-the-ground housing situation. Though Housing Needs Assessment findings help to build a foundation of understanding, community conversations fill it in and correct misinterpretations when needed. Engaging with people in a community, including those vulnerable to insecure housing, can bring to light various insights. Examples of potential insights:

- Need for certain types of housing for small households, seniors, students, homeless residents, persons with disabilities.
- Stories that help illustrate realities associated with data findings and help to build qualitative knowledge. Recognition of possible unintended consequences.
- Area specific characteristics affecting housing (infrastructure availability), local challenges and opportunities, and effects of current policies.

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Public Engagement Planning Tips (Optional)*

Although a public engagement plan is optional, it can help jurisdictions proactively determine how they will engage their community in a way that helps shape the development of the Housing Action Plan throughout the process. A public engagement plan can describe the schedule outlining when different public participation activities would occur, who will be targeted for different types of engagement efforts, the goals for the engagement, and how the public involvement will be integrated throughout the Housing Action Plan development process. Public engagement plans typically outline objectives for the engagement.

Example Public Engagement Objectives **

- Inform the community with timely, transparent, and accurate information.
- Educate community members about planning, state provisions, and the decision-making processes. Build awareness about the plan.
- Reach a diversity of stakeholders who reflect the greater community. Focus on inclusive outreach, ensuring all voices are meaningfully included, especially from marginalized groups.
- Provide space for all to have an opportunity to provide meaningful feedback, integrating activities that allow for in-person and virtual engagement.
- Build a list of people and organizations who wish to participate directly in the process and keep them informed, efficiently, throughout the process. Include people most impacted by the Housing Action Plan, identifying communities at risk of displacement.
- Build long-term relationships with community groups and businesses.

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Section 3.2. Who to Engage?

Jurisdictions may involve a broad cross-section of the community and take a broad view of public participation, using techniques that support meaningful and inclusive engagement. Different types of perspectives can be identified that help represent the diverse interests and backgrounds of the jurisdiction's residents. Jurisdictions can include effective engagement strategies for communities at risk of displacement, and under-represented or disadvantaged residents (such as low-income persons, People of Color, tribes, etc.). In addition, they can select activities to reach out to the community broadly and make it comfortable for them to share their input. Steps on who to engage are provided below to help jurisdictions get started.

Steps for Who to Engage (Optional)*

1. Identify who will be involved (such as interests/groups) and who is hard to reach.
Sometimes jurisdictions convene interviews early in the process with decision-makers and community liaisons to inform engagement techniques and identify a more comprehensive, expanded list of participants/groups.
2. Identify strategies for how the hard-to-reach groups would like to be engaged (such as historically marginalized people such as people of color, low-income people, workers). Consider ways to overcome barriers to participation that may arise. Inclusivity is foundational looking at who is participating, then understanding who is missing and targeting outreach to them is important.
3. Consider findings from past engagement recently completed for similar projects and insights on the preferred techniques for engagement.
4. Work with partners engaging the same groups to coordinate engagement efforts efficiently to avoid perpetuating engagement fatigue.
5. Consider ways to broaden and boost participation by for example, hosting discussions at existing community group meetings or at existing community events. Meeting people where they are lessens the burden of participation.

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A meaningful process benefits from multiple methods and practices to reach and learn from those most affected by housing actions and to empower them to participate in the Housing Action Plan development process.

Common Types of Audiences

- General public and residents
- Property owners, property managers, landlord and tenant groups
- Developers (including affordable housing developers)
- City staff and elected officials, regional and county agencies, transit agencies, utility providers
- Tribes, immigrant and cultural groups
- Affordable housing residents, nonprofits, and service providers and housing authorities
- Homeless residents and service providers
- Business owners, chamber of commerce, and local workforce
- Neighborhood associations
- Senior housing providers, assisted living
- School district, educators
- Communities at risk of displacement (see the [Displacement Risk Assessment Guidance Document V1](#), glossary provides more information on displacement)

Matrix of Public Engagement Activity Examples**

Example	Description and Considerations
Community Survey 	Broad engagement helps to learn about housing needs, challenges, and circumstances. Online is easier to process but paper surveys might be needed for certain people. An employer/workforce survey can be developed to understand the housing impacts local businesses (recruiting, retaining employees) and workers (long commutes, displacement) are facing.

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Example	Description and Considerations
Interviews and Focus Groups 	<p>Helps gain insights from specific community groups and at-risk communities (e.g., service providers, developers, affordable housing providers, nonprofits, etc.). One-on-one or small group meetings with those having special knowledge can be a highly effective way of gathering information and identifying potential solutions. Meeting scheduling will ideally prioritize the convenience of the participants.</p>
Workshops, Open Houses 	<p>Open houses or workshops help share information and education in an accessible way and time (such as evenings). This is helpful for gaining general feedback. Posters and background pieces can be provided to share key information. Sign-in sheets can be used to record participation. Methods for leaving feedback can be considered such as comment forms, surveys, post-it notes for posters. Presentations covering the plan are sometimes provided but they require attendees to attend at a certain time, while posters can be offered throughout the event.</p>
Pop-up at Community Hub or Piggyback on Public Events 	<p>Pop-ups are like small open houses where staff set up posters and information at a popular public location (library, farmers market, coffee shop, community center/park). Piggyback engagement is when staff attends a community event or existing community group's own meeting to discuss housing in a comfortable space. These activities help share information with a broader range of people and are useful for getting more people to respond to surveys. Materials need to be well-designed to convey information quickly.</p>

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Example	Description and Considerations
Committee (Advisory) 	An advisory committee, working closely with the project team to develop a Housing Action Plan, can be composed of knowledgeable local experts. Often this group can meet throughout the plan development process particularly during project milestones or when key decisions will be made, helping to shepherd the plan development process. They can help provide guidance and ground the direction to fit the community context. This group could include varying perspectives and expertise such as affordable housing developers, housing nonprofit representatives, human service providers, regional agency representatives, representatives of communities at risk of displacement, employers with workforce housing needs, etc. Although these committees can be helpful, they can necessitate additional time, require extra education, and can be challenging to establish.

Other Ideas: Walking tours where strategies are being considered, charrettes, meetings with community liaisons or key community informants.

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Housing Action Plan Public Engagement Steps (Optional)**

As noted above, the first step is typically to create an engagement plan and identify groups and individuals to include in the process.

1. Jurisdictions can develop a Housing Plan project webpage where information will be shared, including project contacts, engagement announcements, project schedule, and education useful for building awareness. The educational materials can cover housing challenges and integrate facts that resonate with the community.
2. Identify timing and ways to engage specific interest groups and the public in a way that welcomes diverse and meaningful input to learn more about housing needs, challenges and opportunities, experiences, priorities, and implementation partners.
 - a. Decision-makers can be engaged throughout the plan development process.
 - b. Engaging broadly helps to build awareness and learn from the community. Platforms like online surveys, and dedicated websites allow for broader and more flexible community participation. Community surveys soliciting information on housing needs, challenges, and opportunities can be carried out early in the process, while surveys reviewing strategies and priorities are typically scheduled later in the process.
 - c. Consider methods that elevate voices of those who tend to be missed through traditional outreach but that can be most impacted by the lack of affordable housing (historically marginalized or underrepresented such as, people of color, low-income). Examples include small group community conversations at a comfortable community location or hosting a pop-up open house at a community event. Use clear language and graphics, avoid jargon, and translate for languages spoken within the community.
3. Document and summarize engagement findings, provide this summary of information to the public, and use these insights to shape the Housing Action Plan. Effective engagement can consider transparency (clear about purpose and use), authenticity (using the input requested), and appropriateness (engage in a way that gets to results). It is important to keep the public informed, and to close the loop with feedback and evaluation.

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Public Engagement Tips for Success (Optional)**

- Solely relying on traditional approaches such as public hearings tends to only reach a limited segment of the community and fails to capture diverse perspectives.
- Integrate methods for providing education in different formats (website, factsheets, presentations, etc.) and explain terminology and jargon.
- Collaborating with local organizations by hosting at existing group meetings helps tap into existing community networks and enhances outreach and efficiency.
- Value participants' time and expertise and avoid engagement fatigue (tips: gain an overview of past engagement findings, set expectations, ask for referrals).
- Consider ways to integrate interactive activities that support idea sharing and shared learning (such as polls, Q&A discussions). Bring in experts to help answer questions and share insights (such as development professional, affordable housing expert).
- At broader community events, offer childcare, reimburse participants for childcare on family-friendly events; hold events at locations accessible by multiple transportation modes; offer food and beverages; and select venues that are familiar, comfortable, accessible, and considered a community space. Consider virtual engagement options for those with time constraints and health concerns.
- Consider stipends especially for participation such as with focus groups or steering committees requiring more time.
- Engaging decision-makers throughout the process can support the final process to adopt a plan. Surprises late in the game can deter progress.
- Present information in a straightforward and compelling way, connecting with relatable examples in the community, can help build trust and dispel myths.
- Build in time to re-evaluate engagement techniques to adjust as needed.

Unsurprisingly, an approach that relies on one-size-fits-all for community engagement is not advised. Jurisdictions should develop context-sensitive approaches, drawing from a range of methods building on their specialized needs and circumstances.

Note: Additional resources are provided in the Appendix on topics such as communicating and messaging associated with housing planning. [DOLA Guidance on Community-Driven Engagement in Community Planning has additional tips.](#)

CHAPTER 4:

HOUSING ACTION PLAN GOALS, STRATEGIES, AND ACTIONS

Chapter 4 covers the guidance to help build the core elements of a Housing Action Plan reflecting a community's housing planning efforts. This chapter brings together Housing Needs Assessment and public engagement findings and community priorities to shape a clear path forward in a Housing Action Plan. A Housing Action Plan should set measurable housing goals, selecting strategies that reflect a community's unique needs and capacities, and identifying specific implementation actions.

WHAT WILL YOU FIND IN THIS SECTION?

- Goals and Targets for a Housing Action Plan
- Strategies and Actions for a Housing Action Plan
 - Create development plans that serve all income level
 - Create and Preserve Affordable Housing
 - Mitigate Displacement Pressures
 - Recommend Modifications to Local Zoning
 - Foster Transit-Oriented Development Opportunities
- Developing a Comprehensive Strategy Framework
- Evaluating and Prioritizing Strategies and Actions

Chapter 4. Housing Action Plan Goals, Strategies, and Actions

This chapter brings together Housing Needs Assessment and public engagement findings with community priorities to shape a clear path forward in a Housing Action Plan. A Housing Action Plan sets measurable housing goals, selecting strategies that reflect a community's unique needs and capacities, and identifying specific implementation actions.

While SB 24-174 outlines key requirements, the statute also leaves room for innovation. Communities are encouraged to build on local experience, explore strategies from other regions and states, and tailor approaches that fit local and regional conditions. Whether a jurisdiction focuses on preservation, production, anti-displacement, or equitable access, this section helps to develop a Housing Action Plan that is grounded in data, shaped by community input, and responsive to the local context and a community's needs.

What will you find in this chapter?

- [Section 4.1. Goals and Targets for a Housing Action Plan](#)
- [Section 4.2. Strategies and Actions for a Housing Action Plan](#)
 - [4.2 \(i\) Support development that serves all income levels](#)
 - [4.2 \(ii\) Create and Preserve Affordable Housing \(standard and long-term\)](#)
 - [4.2 \(iii\) Mitigate Displacement Pressures](#)
 - [4.2 \(iv\) Recommend Modifications to Local Zoning](#)
 - [4.2 \(v\) Foster Transit-Oriented Development Opportunities](#)
- [Section 4.3. Developing a Comprehensive Strategy Framework](#)

The state statute provides flexibility in how to structure the content of the plan. Although not required, a Housing Action Plan can include actions or steps that help to

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provide more detail on how to implement different strategies. Tips are provided below to help describe different plan elements to consider for inclusion.

Tips for How to Structure a Housing Action Plan*

Structuring an effective Housing Action Plan will both support a community's goals and develop sufficient detail to drive action. The plan can serve as a road map for how a jurisdiction will take actions to meaningfully address the community's housing needs. A Housing Action Plan can include general guiding principles (or a vision statement) to describe ideal outcomes, a set of goals, strategies linked to goals, and actions linked to strategies for implementing the plan. Each plan element helps to connect big picture aspirations with tangible actions in a work plan.

Different Plan Elements:

- **Guiding Principles or a Vision Statement (Optional)** articulates an ideal outcome in the future for the jurisdiction (typically concise). These are essentially the foundation for how to approach and implement the work.
- **Goals or Targets (Required)** are general statements on what the community wishes to accomplish, summarizing the intended outcomes for strategies.
- **Strategies (Required)** provide detail on how to achieve a goal. Typically, there are more strategies than goals and more than one strategy for each goal. The term strategies sometimes is referred to as an action.
- **Actions (Optional)** tend to provide more specific and useful detail on the steps needed to implement strategies. Sometimes steps are included for each action, if more detail is needed for how to effectively act.

Note: Strategies can support more than one goal, and actions can support more than one goal or strategy. The implementation plan detailing what, who, when, and how actions will be executed and whether they link to other planning efforts is described further in [Chapter 5](#).

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Section 4.1. Goals and Targets for a Housing Action Plan

Communities should define locally appropriate housing goals and targets based on the findings of their Housing Needs Assessment. These goals serve as the foundation for selecting appropriate strategies and actions in the Housing Action Plan.

Translating Housing Needs Findings into Goals and Targets

[Section 4.2](#) of this guide describes how a community can identify and prioritize strategies that meet the most pressing housing needs from the Housing Needs Assessment including affordability gaps, production shortfalls, and underserved populations or housing types. This section sets up that foundation. Effective goals and targets directly respond to those previously identified needs, helping to guide the selection of strategies and actions in the remainder of the Housing Action Plan.

This section helps to develop goals that will:

- Direct strategy selection.
- Create accountability for implementation.
- Establish metrics for measuring success.
- Support regional housing coordination.

Right-Sized Goals Tip*

Housing Action Plan goals can be ambitious enough to meaningfully address housing needs but realistic enough to be achievable. Consider the community's development capacity, funding resources, political environment, and market conditions when setting targets.

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*Selecting a Goal-Setting Approach (Optional)**

Before establishing specific targets, communities may consider which approach best fits the community:

Approach	Description	Community Considerations
Needs-Based	Sets goals directly from housing shortages identified in the Housing Needs Assessment	Communities with clear data on housing gaps
Capacity-Based	Sets goals based on realistic implementation capacity	Communities with limited resources or constraints
Benchmark	Uses successful models from comparable communities	Communities seeking proven approaches
Hybrid (Recommended)	Combines housing needs targets/gaps with practical considerations related to the capacity of the jurisdiction	Most communities

Core Elements of Housing Goals and Targets

★ **Housing Action Plans are required to include housing goals, an explanation for how strategies respond to the needs identified in the jurisdiction's Housing Needs Assessment, and (if applicable) a regional housing allocation (C.R.S. 24-32-3705(3)(b)).**

A community is not required to set numeric targets for every housing type or income level. Many communities, especially those with limited capacity, may choose to focus on one or two high-priority areas such as rental housing for households earning 60-80% AMI or the preservation of existing affordable units.

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Although state statutes do not specify a required number of goals, a Housing Action Plan typically includes a set of goals (usually less than 10). The categories below offer a flexible framework to help organize goals, guide strategy selection, and track progress over time. Jurisdictions may use the ones that best reflect local context, or any others that they find fitting to the circumstances in their community.

Example: Housing Production Targets**

Based on the Housing Needs Assessment's findings regarding housing shortages and projected needs, example targets can include any of the following:

- **Total housing units:** Set an overall production target for the community.
- **Units by income level:** Specify targets for extremely low, very low, low, moderate, and middle-income housing.
- **Units by tenure:** Set targets for rental and ownership housing.
- **Units by type:** Establish targets for different housing types (single-family, multifamily, missing middle).
- **Special needs housing:** Set targets for accessible, visitable, and supportive housing.

Note: Jurisdictions can select a handful to track.

Housing Production Targets Tip*

The Housing Needs Assessment Guidebook provides more detailed guidance on developing housing production targets. The targets may include needs based on an existing housing shortage to catch up on meeting housing needs. The housing shortage calculation can at a minimum alleviate overcrowding in housing and ensure a functional vacancy rate. In addition, targets can include projected housing needs estimating the number of dwelling units needed by income level to ensure housing availability, stability, and affordability for future resident and employee households. Projections must be reported for a 10-year timeframe. However, Housing Needs Assessment reports may also include projections on shorter (e.g., 5-year) or longer (e.g., 20-year or more) timeframes, depending upon the needs of the study area. You can find more information at [DLG Housing Plans](#).

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Example: Housing Preservation Targets**

Examples of preservation goals to maintain existing affordable housing include:

- **Naturally occurring affordable housing:** Set targets for preserving unsubsidized affordable units.
- **Regulated affordable housing:** Establish goals for preserving units with expiring affordability restrictions.
- **Housing rehabilitation:** Set targets for rehabilitating deteriorated housing.
- **Mobile home preservation:** Include goals for preserving and improving manufactured housing communities.

Example: Anti-Displacement Goals**

Based on the displacement risk assessment findings, establish goals to mitigate displacement in areas with high displacement risk. Examples include:

- **Household stability:** Set targets for stabilizing households at risk of displacement.
- **Housing conditions:** Establish goals to improve housing conditions to keep people in their homes.
- **Access to housing:** Develop goals to improve access to diverse types of housing meeting more diverse needs (different housing sizes, locations, accommodations, etc.).

4. Equitable Access Goals**

Examples of goals to ensure equitable access to housing across a community include:

- **Geographic distribution:** Set targets for distributing affordable housing throughout the jurisdiction.
- **Access to opportunity:** Establish goals for housing near transit, jobs, and services.
- **Homeownership access:** Set targets for increasing homeownership among underrepresented groups

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Aligning Goals with Regional Housing Allocations

- ★ If a jurisdiction was included in a regional Housing Needs Assessment, the Housing Action Plan is required to address how it will accommodate the identified share of regional housing needs (C.R.S. 24-32-3705(3)(b)).

To comply, include the following elements:

- **Reference any regional allocations:** Clearly state the number and types of housing units identified to the jurisdiction in the regional Housing Needs Assessment.
- **Compare goals to allocation:** Explain how the housing production goals align with the regional allocation.
- **Address any gaps:** If the goals differ from a locally set allocation, provide a clear rationale for the difference.

*Tips for Balancing Ambition and Feasibility in Goal Setting**

Setting effective housing goals requires balancing ambition with feasibility. Consider the following approaches:

Tiered Goal Structure

- **Baseline Goals:** Minimum achievements with current resources and capacity.
- **Target Goals:** Desired outcomes with modest new resources or policy changes.
- **Stretch Goals:** Ambitious outcomes if significant new resources become available.

Testing Goal Feasibility

- **Resource Assessment:** Identify funding, staff, and partner capacity needed.
- **Political Will Check:** Gauge level of community and leadership support.
- **Market Reality Test:** Evaluate the private market circumstances and potential effects in relationship to the goals.
- **Implementation Timeline:** Assess whether goals can realistically be achieved in the timeframe.

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When setting goals, be explicit about assumptions for:

- Expected development activity and economic conditions
- Success rates of incentive programs
- Availability of funding (local, state, federal)
- Partner capacity and involvement

Using Goals to Guide Implementation and Monitoring

The goals and targets serve multiple purposes in the Housing Action Plan.

- **Strategy selection:** Goals inform which strategies to select.
- **Prioritizing Actions:** Goals help prioritize implementation.
- **Monitoring Progress:** Goals provide metrics to measure success.
- **Reporting to the state:** Goals provide a clear framework for reporting progress after three years (C.R.S. 24-32-3705(6)).

Remember the Progress Report: Three years after adopting a Housing Action Plan, a jurisdiction will need to report progress to the Department regarding the adoption of strategies and changes to local laws (Section 24-32-3705(6)). Clear, measurable goals will make this reporting more straightforward.

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*City of Louisville, Colorado Housing Plan Goals and Strategies Example***



The image shows the cover page of the City of Louisville Housing Plan. At the top, it says "IMPACT THROUGH INSIGHT". Below that is a graphic of colorful houses with a location pin. The main title "City of Louisville Housing Plan" is in the center. Logos for ECONorthwest and the City of Louisville are at the bottom. Text at the bottom left says "Prepared for City of Louisville Final Housing Plan". Text at the bottom right says "Adopted by City Council May 7, 2024".

Goal 1: Increase Residential Development Opportunities in Louisville

Goal 2: Expand and Maintain Access to Affordable Housing

Goal 3: Diversify Louisville's Housing Stock

The goals help to frame the 3 key strategies that include specific actions for the City to take in the near and long term as it aims to increase access and opportunity for residents in Louisville.

STRATEGY 1

Targeted Policy and Zoning Code Changes to Reduce Barriers for Residential Development

STRATEGY 2

Leverage Funding Opportunities and Partnerships to Support Income-Restricted Affordable Housing

STRATEGY 3

Comprehensive Policy and Zoning Code Changes to Better Support Residential Development and Allow for More Diverse Housing Types

Section 4.2. Strategies and Actions for a Housing Action Plan

This section helps translate Housing Action Plan goals to specific strategies and actions. Once communities have identified housing needs and set goals, the next step is identifying how a community will act on them. Effective strategies aim to respond directly to the needs and gaps identified in the Housing Needs Assessment and reflect the goals prioritized. They do not need to reinvent the wheel. Many communities already have tools in place that they can refine or scale. Others may benefit from new approaches drawn from state-provided directories or local innovation.

Jurisdictions have a finite set of tools to influence different components of the housing market. The [Affordability and Displacement Mitigation Strategies Directory](#) provides details on strategies listed in SB 24-174 which provides options for actions the jurisdictions can take. Jurisdictions are not limited only to the actions in this directory and may include existing strategies or programs.

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Broad Category Examples of Jurisdictional Interventions**

- **Incentives** encourage housing developers to provide desired housing types (tax exemptions, waiving fees, grants, etc.).
- **Policy and Permitting Changes** may update the city's code, permitting processes, fees charged for development, or requirements related to housing.
- **Technical Assistance** provides targeted support from city staff to partner organizations.
- **Financial Support** increases available funding for a variety of housing initiatives and the construction of affordable housing projects.
- **Land and Infrastructure Support** includes land donations or investments in key infrastructure to help support housing needs.
- **Partnership Building** strengthens relationships with nonprofits, developers, and more and can include public-private partnerships to further housing goals.
- **Research and Monitoring** may track existing conditions or emerging trends to better understand Bainbridge's housing needs.

Communities are not required to select strategies for every possible issue. Instead, they may focus on those that align with the highest priorities that the community has the capacity to implement. Some jurisdictions may center their plan around a handful of high-impact tools; others may pursue a broader set of actions. Either approach is valid, as long as the strategies directly support locally defined goals.

Ideally, each strategy will be clear, connected to a specific housing need, and feasible given the local context. Together, they will shape a practical roadmap for addressing housing needs in the years ahead. There is no “silver bullet” for choosing a single housing strategy, as each idea brings benefits, drawbacks, different levels of impact, and tradeoffs. Housing strategies also benefit from periodic evaluation as development conditions change over time, requiring flexibility and a renewed effort to fill funding gaps in innovative and creative ways.

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*Housing Strategy Selection Example for Housing Action Plans***

Local governments may use any method that they choose to appropriate strategies. Developing selection criteria for affordability and displacement mitigation strategies However, local governments may choose to develop local criteria to consider which strategies are most appropriate for the community. A common set of steps for identifying strategies can include first identifying goals that need direct action. This can be based in the findings of the Housing Needs Assessment, a review of existing policies, and which goals have clear action needs. Next, a community can consider different types of strategies that focus on topics like housing production (e.g. development incentives), preservation (e.g. home rehabilitation), protection (e.g. tenant protections), or funding (e.g. dedicated revenue sources). Jurisdictions can then filter these options through local context considerations like staff capacity, community support, available land and infrastructure, or funding and partnerships. Finally, these considerations can guide finalization of Housing Action Plan strategies.

Housing Strategy Selection Example FOR HOUSING ACTION PLANS



The subsections that follow walk through several types of required and optional strategies, including actions to:

- Create development plans that serve all income levels,
- Produce and preserve affordable housing,
- Mitigate displacement,
- Recommend zoning modifications, and
- Foster transit-oriented development.

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4.2 (i) Support Development that Serves All Income Levels

★ Per C.R.S. 24-32-3705(3)(d), a Housing Action Plan must include "a plan to promote the equitable and efficient development of the number and types of dwelling units identified through any applicable housing needs assessment as necessary to satisfy housing needs in the local government's jurisdiction at different income levels, including extremely low-, very low-, moderate-, and middle-income households as designated by the United States Department of Housing and Urban Development, subject to the availability of adequate public facilities, public services, and water supply."

Using the findings from the Housing Needs Analysis and community goals as a foundation, this component of the Housing Action Plan will document how the different strategies will support providing housing needs in a jurisdiction at different income levels. Different income levels should be defined specifically using the Area Median Income applicable for the subject jurisdiction, considering ways to be consistent with existing affordable housing programs and locally relevant code (if applicable).

As noted above, a community is not required to set numeric targets for every housing type or income level. Many communities, especially those with limited capacity, may choose to focus on one or two high-priority areas such as rental housing for households earning 60-80% AMI or the preservation of existing affordable units. The goal for this provision is for the Housing Action Plan to include a broad range of strategies that address housing needed by different household incomes, particularly those currently lacking housing options and in support of more equitable access to housing.

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*Example Strategies for Different Income Levels***

Income Category	Low Income (80% AMI or less)	Moderate Income (81 to 95% AMI)	Middle Income (96 to 120% AMI)	All Income Levels (including 120%+)
Examples	<ul style="list-style-type: none"> • Affordable housing incentives (e.g. density bonus, fee reductions) • Affordable housing levy • Allocate local funds for affordable housing • Support for nonprofit developers • Update code language for transitional housing • Surplus land donation • User-friendly platforms for affordable housing applications 	<ul style="list-style-type: none"> • Workforce housing initiatives • Enhance policies for manufactured homes or ADUs • Home rehabilitation / weatherization programs • Track the supply of naturally occurring affordable housing • Expand community land trust and housing cooperatives • Code updates for diverse small housing options 	<ul style="list-style-type: none"> • Enable missing middle ownership housing • Code updates for diverse small housing options • Expand community land trust and housing cooperatives • Evaluate parking and density requirements to encourage housing development in Designated Centers 	<ul style="list-style-type: none"> • Housing Design Demonstration Program (emphasizing sustainable housing at any income level). • Accessible housing design incentives • Short-term rental tracking • Increase residential density in centers and areas with existing infrastructure

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4.2 (ii) Strategies to Create and Preserve Affordable Housing

This section guides jurisdictions in selecting and implementing strategies to create and preserve affordable housing.

★ C.R.S. 24-32-3705(3)(e) requires:

"Locally-appropriate goals, strategies, and actions for promoting the production and preservation of affordable housing development and regulated affordable housing, including at least two strategies included in the standard affordability strategies directory...and one strategy included in the long-term affordability strategies directory...that are selected to address the demonstrated housing needs in the local government's jurisdiction and are suitable for the jurisdiction..."

To meet this requirement, the plan must include:

- **At least two strategies** from the Standard Affordability Strategies Directory (C.R.S. 24-32-3706(1)) or other strategies with comparable impact
- **At least one strategy** from the Long-Term Affordability Strategies Directory (C.R.S. 24-32-3706(2)) or other strategies with comparable impact

These strategies must address the demonstrated housing needs in a jurisdiction and be suitable for local implementation. See the [Affordability and Displacement Mitigation Strategies Directory](#) for additional details on individual strategies listed in the legislation. Additional or existing strategies may be considered that have a comparable impact and respond to identified housing needs in the community.

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For each strategy selected from the Department's directories, jurisdictions should provide at least the baseline requirements for the following information:

1. Strategy Description

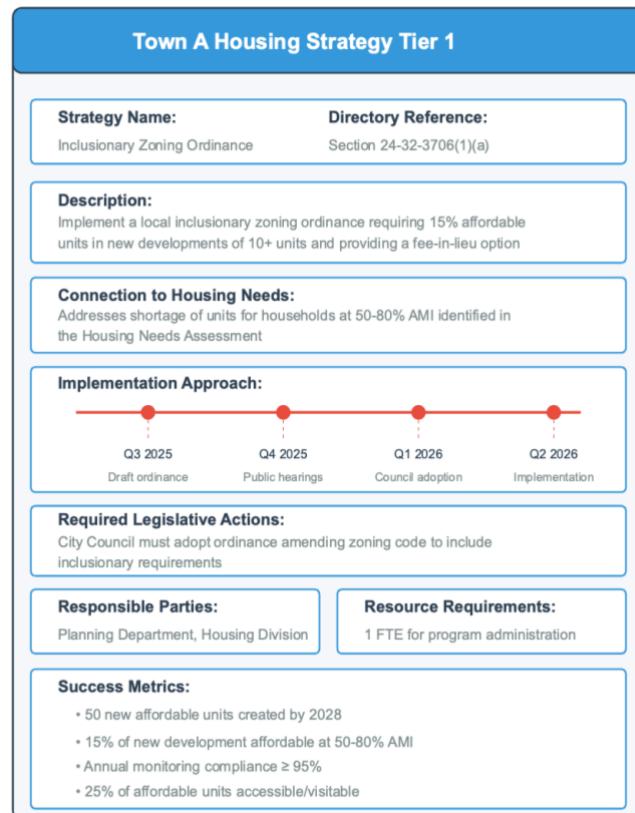
- Clear description of the strategy and how it will work in the community (**Baseline**)—See **Affordability and Displacement Mitigation Strategies Directory**: “What is This Strategy?”
- Specific details on program parameters, eligibility requirements, and operations (**Suggested**)

2. Connection to Housing Needs

- Explanation of which specific housing needs from the Housing Needs Assessment this strategy addresses (**Baseline**)—See **Affordability and Displacement Mitigation Strategies Directory**: “Why Choose This Strategy For A Community?”
- Quantification of potential impact (e.g., number of units, households served (**Suggested**)

3. Implementation Approach (**Suggested**)

- Required legislative actions
- Responsible departments or entities
- Timeline for implementation
- Estimated resource requirements (staff, funding, etc.)



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4. Success Metrics (Suggested)

- Specific, measurable outcomes to track success
- Baseline data and targets
- Monitoring and reporting approach

See below for example strategies with baseline and optional components.

Example 1: Standard Affordability Strategy**

Standard Strategy Example: Density Bonus Program (C.R.S. 24-32-3706(1)(d))

Description (Required): Amend zoning code to offer a 50% density bonus and reduced parking requirements for developments with at least 20% affordable units.

Rationale (Required): Our Housing Needs Assessment identified a shortage of rental housing affordable to households between 50-80% AMI, particularly near employment centers.

Financial feasibility analysis indicates that a 50% density bonus would offset the cost of the affordable units, making this an effective tool in our jurisdiction.

Implementation Steps (Suggested):

1. Draft density bonus ordinance (Q3 2025).
2. Planning Commission and City Council review/approval (Q4 2025).
3. Develop program materials and monitoring procedures (Q1 2026).
4. Program launch (Q2 2026).

Success Metrics (Suggested): Adoption of density bonus ordinance by December 2025.

Production of 100 affordable units through the program within three years. At least 5 developments utilizing the bonus within 2 years.

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Example 2: Standard Affordability Strategy**

Standard Strategy: Expedited Approvals (C.R.S. 24-32-3706(1)(e))

Description (Required Component): Implement a fast-track review process for developments with at least 25% affordable units, cutting typical review times in half.

Rationale (Required Component): Our Housing Needs Assessment identified that lengthy, unpredictable approval processes increase development costs and risk, deterring affordable housing projects. This program will accelerate production of affordable housing.

Implementation Steps (Suggested Component):

1. Develop process flow and eligibility requirements and train staff on procedures (Q3 2025).
2. Create program materials and application forms (Q4 2025).
3. Program launch (Q1 2026).

Success Metrics (Suggested Component): Reduction in review time for eligible projects by at least 50%. At least 5 affordable housing projects using the fast-track process annually.

Developer feedback indicating improved process and reduced costs.

Example 3: Long-Term Affordability Strategy**

Long-Term Strategy Example: Dedicated Revenue Source (C.R.S. 24-32-3706(2)(a))

Description (Required Component): Establish a dedicated affordable housing fund supported by a 1% fee on commercial development over 10,000 square feet.

Rationale (Required Component): Our Housing Needs Assessment demonstrated a connection between commercial growth and housing demand in our jurisdiction. This linkage fee will generate an estimated \$2 million annually to support affordable housing development.

Implementation Steps (Suggested Component):

1. Conduct nexus study to establish legal basis for fee (Q2-Q3 2025)
2. Draft ordinance with stakeholder input (Q4 2025)
3. City Council review/approval (Q1 2026)
4. Fee implementation (Q2 2026)

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Success Metrics (Suggested Component): Adoption of linkage fee ordinance by March 2026. Generation of at least \$1.8 million in annual funding. Leveraging of local funds at a 4:1 ratio with other sources. Support for at least 50 affordable units annually.

4.2 (iii) Mitigate Displacement Pressures

★ Per C.R.S. 24-32-3705(3)(f), a Housing Action Plan must include "a narrative analysis of any area or community that the local government has identified as being at elevated risk of displacement and a plan to mitigate displacement in that area or community, including the identification of at least one displacement mitigation strategy included in the displacement risk mitigation strategies directory...that the local government selects to address the findings of the local government's narrative analysis and is suitable for the jurisdiction."

Jurisdictions must complete a Housing Action Plan that includes at a minimum:

- **Narrative analysis of areas at elevated risk of displacement**
- **At least one strategy** from the Displacement Mitigation Strategies Directory (Section 24-32-3706(4)) or other strategies with comparable impact

Using the findings from public engagement and housing needs analysis as a foundation and the goals set for the Housing Action Plan, this section will document anti-displacement strategies. The actions should describe specific policies, programs, code changes, investments, administrative measures, advocacy efforts, or other tools that will support the community's ability to prevent or mitigate displacement. **See the [Affordability and Displacement Mitigation Strategies Directory](#) for additional details on displacement mitigation individual strategies listed in the legislation.**

Tailoring Strategies to Community Context

Just as there is no one-size-fits-all approach to affordable housing, strategies to mitigate and prevent displacement must also be designed to address specific community contexts. The displacement risk assessment component of the Housing

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Needs Assessment is intended to help determine who is most vulnerable in a community, where they are located, and to understand the displacement pressures being experienced by residents and businesses. Review the [Displacement Risk Assessment Guidance](#) for more information.

4.2 (iv) Recommend Modifications to Local Zoning

★ Per C.R.S. 24-32-3705(3)(h), a Housing Action Plan must include "any recommended changes to local laws affecting zoning and density in the local government's jurisdiction before the local government conducts the next Housing Action Plan."

Use the zoning and density assessment in [Section 2.2](#) as a foundation. This section will document any planned zoning or density changes designed to increase housing production or preservation, including changes to lot sizes, permitted uses, building heights, lot coverage, density, setbacks, parking requirements, or review processes and fees.

Reviewing zoning related development regulations is a useful exercise especially since they can become out of date, have conflicts or inconsistencies, and fail to address new needs or community goals. An audit supported by regular code users (such as developers) can help identify which regulations the jurisdiction could amend.

Common Zoning and Development Regulation Issues to Consider*

- Does the community lack developable land in zones allowing diverse types of housing other than single-family detached (such as middle housing)?
- In the allowed use section, how has middle housing and other forms of diverse housing been addressed or limited?
- Are there challenging site development restrictions that could be revisited such as overly large minimum lot sizes or lot widths, large setbacks, a small amount of

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land coverage, overly low building heights, strict ground level requirements for mixed-use development, or high off-street parking requirements?

- Are there regulations that could be added to help more diverse housing fit into the community? How are permitting provisions and fees for tiny homes, cottage housing, townhouses, etc. addressed in the zoning code?

4.2 (v) Foster Neighborhood Centers and Transit-Oriented Communities

★ Per C.R.S. 24-32-3705(3)(i), a Housing Action Plan must include "an analysis of opportunities to achieve the development of higher-density and regulated affordable housing within a reasonable distance of major in the jurisdiction."

Similar to local zoning, jurisdictions may use the zoning and density assessment in [Section 2.2](#) as a foundation for this requirement. This section will document any planned investments, incentives, policies associated with zoning, affordable housing, and other policies and programs supporting Transit-Oriented Community (TOC) development that is designed to increase housing production, including changes to lot sizes, permitted uses, building heights, lot coverage, density, setbacks, parking requirements, or review processes and fees. The actions can describe specific policies, programs, code changes, investments, administrative measures, advocacy efforts, or other zoning or land use tools that will support the community's ability to address housing needs.

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Integrating Transit Centers & Neighborhood Centers in a Housing Action Plan



Individual Elements	Community Elements	Environmental Elements
<ul style="list-style-type: none"> Enhanced housing choice (all income levels) Access to job opportunities Healthy and active lifestyle 	<ul style="list-style-type: none"> Housing density Socio-spatial equality Improved road safety Stronger economy Livable community Access to services 	<ul style="list-style-type: none"> Better air quality Smart land use Frequent transit

Image Source: TriMet

House Bill (HB) 24-1313 requires designated **Transit Oriented Communities (TOC)** to create enough zoning capacity around Transit Centers to meet or exceed their Housing Opportunity Goals (for a list of subject jurisdictions, view [DOLA's TOC](#)

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[webpage](#)). Requirements for communities to select affordability and displacement mitigation strategies as part of housing action planning and TOC planning include some overlap, particularly in suggested strategies that communities can use to achieve these goals. The [Affordability and Displacement Mitigation Strategies Directory](#) provides a crosswalk of relevant strategies that can be used to satisfy both sets of requirements. *Jurisdictions may utilize the same strategies for compliance with each law except where noted in the strategies directory.*

Neighborhood Centers are a similar but optional designation that communities may apply for through DOLA for certification. As identified in SB 24-174 and HB 24-1313, Neighborhood Centers are voluntarily designations by local governments in areas that meet the criteria established by DOLA. Neighborhood Centers may be designated both in areas that currently exist as mixed-use pedestrian-oriented neighborhoods, or that anticipate becoming a mixed-use pedestrian-oriented neighborhood over time through plans and policies. The goal is to provide coordinated investments to achieve over time a walkable and bikeable built environment with access to jobs, services, and, where possible, transit. While Neighborhood Centers do not require selection of affordability strategies, they may have co-benefits for meeting housing goals by encouraging density and other objectives. DOLA is developing criteria for Neighborhood Center certification that considers varying regional contexts to be posted by June 30, 2025. You can find more information at [DOLA Transit-Oriented Communities](#).

Section 4.3. Developing a Comprehensive Strategy Framework

While SB 24-174 requires certain minimal strategies from the Department's directories, effective Housing Action Plans may include a broader range of complementary strategies and implementation considerations. Jurisdictions are only required to meet the baseline. However, they may consider organizing different

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categories of strategies in a specific framework or by how they address different goals to facilitate adoption.

- ★ **Per Section 24-32-3705(3)(g), a Housing Action Plan must include "a plan for the legislative consideration for adoption of the strategies identified in subsections (3)(e) and (3)(f)." For each strategy, clearly identify what legislative actions (ordinances, resolutions, etc.) will be needed for implementation.**

Evaluating and Prioritizing Strategies and Actions

Often jurisdictions might choose more strategies or actions than they have the capacity to implement. To proactively create an actionable plan, local governments can evaluate strategies and associated actions as a way to help with the selection or prioritization process.

As a first step, jurisdictions might review how the Housing Action Plan is consistent with their existing comprehensive plan goals or policies (and consider cases where the Housing Action Plan calls for certain updates to the comprehensive plan). This can help to identify legislative actions needed or opportunities to streamline with other local efforts. The [**Affordability and Displacement Mitigation Strategies Directory**](#) details additional example evaluation criteria to supplement tips below to align strategies with the plan's goals and targets.

Effective Housing Action Plan Strategies Tips*

- **Directly Respond to Identified Needs:** Connect the Housing Action Plan to findings from the Housing Needs Assessment
- **Be Measurable:** Include specific, quantifiable targets wherever possible to track progress and measure success
- **Create Time-Bound Goals:** Specify target timelines for achieving milestones and targets

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- **Address the full spectrum of housing needs:** Include strategies that for various income levels, housing types and tenures, and other needs

Tips for Building a Balanced & Focused Housing Action Plan*

- ✓ **Screen potential strategies for feasibility** including any local legal, financial, political, administrative challenges or opportunities. Jurisdictions could also consider completing an economic feasibility review when considering actions impacting housing development costs such as efforts to stimulate housing or affordable housing production (e.g., updating development standards). This will help to ensure that the action can support implementation.
- ✓ **Apply criteria to prioritize strategies** such as level and distribution of expected impact, time frame, cost, community support, and capacity required (see example criteria above). Coordinating this evaluation regionally can also help to ensure consistency and find opportunities to leverage partnerships. Gain input from decision-makers, staff/partners involved with implementation, and key community interests on the strategy/action.
- ✓ **Finalize a balanced set of strategies** with rationale, expected outcomes, and next steps for implementation and timeline.
- ✓ **Begin developing how to implement strategies and actions by outlining** more in-depth responsibilities, timelines, funding sources, and other considerations.
- ✓ **Integrate strategies into official plans and policies.** This may involve different steps depending on the strategy, like amending a comprehensive plan, zoning code, and relevant ordinances or adopting new policies or budget allocations.
- ✓ **Establish clear indicators and metrics** that can showcase outcomes from adopted strategies. This may vary by strategy and include measures like units produced/preserved, affordability levels achieved, or community feedback.
- ✓ **Regularly review and adapt strategies based on outcomes and changing needs.** Jurisdictions are required to provide a report three years after a Housing Action Plan is adopted. Regular interim reviews before or during this timeline can monitor and adjust strategies based on progress.

CHAPTER 5:

HOUSING ACTION PLAN APPROVAL, IMPLEMENTATION, AND MONITORING

This chapter provides guidance on the process of adopting a Housing Action Plan, intergovernmental coordination, and Housing Action Plan implementation and monitoring. This information is important since SB24-174 legislation states that jurisdictions must gain approval of the Housing Action Plan by the applicable governing body and includes several detailed requirements associated with the finalized Housing Action Plan.

WHAT WILL YOU FIND IN THIS SECTION?

- Housing Action Plan Adoption
- Intergovernmental Coordination
- Example Housing Action Plan Implementation Plan

Chapter 5. Housing Action Plan Approval, Implementation, and Monitoring

This chapter provides guidance on the process of adopting a Housing Action Plan, intergovernmental coordination, and plan implementation and monitoring. This information is important since SB 24-174 legislation states that jurisdictions must gain approval of the Housing Action Plan by the applicable governing body and includes several detailed requirements associated with the finalized plan (see below).

What will you find in this chapter?

- [Section 5.1 Housing Action Plan Adoption](#)
- [Section 5.2 Intergovernmental Coordination](#)
- [Section 5.3 Housing Action Plan Implementation and Monitoring](#)

Section 5.1. Housing Action Plan Adoption

Key requirements associated with the process involved to gain approval of the Housing Action Plan by the applicable governing body are outlined below. Jurisdictions may recognize the approval process that will be required for the Housing Action Plan early on to ensure the governing body (such as a city council or county commission) are engaged appropriately throughout the process. Doing this early on helps to ensure that project timeline sufficiently accounts for time for the approval process. Often Housing Action Plans are approved through a resolution procedure, set by the jurisdiction.

The state requires that Housing Action Plans are approved by the governing body following a public hearing, with the proposed action plan posted on the jurisdiction's website at least 30 days before the public hearing on the plan. Within 60 days after approval, the jurisdiction should submit the Housing Action Plan to DOLA and if applicable, the regional entity associated with a regional housing needs assessment.

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Although not required, jurisdictions have the option of an informal review of their Housing Action Plan from DOLA prior to the approval process (such as before the public hearing).

- ★ **Housing Action Plans must be completed by January 1, 2028. Housing Action Plans are subject to approval by the governing body following a public hearing (C.R.S. 24-32-3705 (1)(a)).**
- ★ **C.R.S. 24-32-3705 (2) requires that “a proposed housing action plan must be posted publicly on a local government's website at least thirty days before the public hearing on the plan.”**
- ★ **C.R.S. 24-32-3705 (4) requires “within sixty days of approval by the governing body, the local government shall submit the Housing Action Plan developed pursuant to subsection (3) of this section to the department and, if applicable, to the regional entity that conducted a regional housing assessment that applies to the local government. The department shall not accept a housing action plan that does not include the components required by section 24-32-3705 (3). The department shall notify a local government if it does not accept a housing action plan. The department shall post the housing action plan on the department's website after accepting the plan.”**
- ★ **Lastly, C.R.S. 24-32-3705 (5) requires “a local government that adopted a plan that substantially meets the requirements of subsection (3) of this section and was the subject of a public hearing held no earlier than January 1, 2024, is not required to conduct a housing action plan until five years after the date of the adoption of the plan that substantially meets the requirements of subsection (3) of this section, notwithstanding subsection (1) of this section.”**

Jurisdictions may identify the governing bodies involved with the approval process early on to ensure they engage with them throughout the plan development process. Some jurisdictions have Planning Commissions, affordable housing committees, a new Housing Action Plan steering or project advisory committee that may be involved.

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Section 5.2. Intergovernmental Coordination

Jurisdictions are required to describe how the Housing Action Plan strategies and actions will integrate opportunities for intergovernmental coordination with other associated jurisdictions such as a city coordinating with the county or regional agency their jurisdiction is located in.

★ Pursuant to C.R.S. 24-32-3705 (3)(k), the Housing Action Plan must include a description of opportunities for intergovernmental coordination to address local and regional housing needs and any such intergovernmental coordination efforts undertaken by the local government.

Coordination with other jurisdictions supports efficiencies with the implementation of a Housing Action Plan by allowing for the use of pooled or shared resources or staff. Regional coordination better aligns with how housing markets often operate at a regional scale.

Section 5.3. Housing Action Plan Implementation and Monitoring

This section provides guidance on creating an implementation and monitoring plan for the Housing Action Plan. Implementation planning and monitoring are crucial for converting written plans into tangible efforts or projects that bring results and advance goals. An implementation plan (optional under state rules) generally provides more detail on exactly what actions will be taken and can involve refinement of an action to clarify steps. Example features that can be integrated in an implementation plan are outlined below.

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Implementation Plan Example Features**

Timeframe: This describes timing for implementing various actions/strategies. A six-year planning horizon could include short-term (1-2 years), medium-term (3-4 years), long-term (5-6 years) categories and they could be described as ongoing.

Complementary Efforts: This describes whether action/strategy can be taken as a part of a comprehensive plan, code amendment, or other effort.

Responsible Parties: The action/strategy priorities could be discussed with partners and shared as a part of community outreach/involvement to ensure alignment. A list of identified departments and partners who are responsible for implementing different strategies/actions can be helpful for setting up key relationships.

Resources/Costs: This describes the level of resources needed, both in staff and other costs (e.g., consultant support) for implementing different actions/strategies. This can also describe the administrative effort involved with implementing different actions/strategies.

Prioritization: This describes the priority level of different actions/strategies and can involve decision-maker, staff, and community input (e.g., high, medium, to low prioritization).

Other Information: Housing Action Plans can include relevant examples and best practices information for different actions/strategies. This can help inform how to move forward in an effective and feasible way, especially if key contextual differences are considered. Sometimes Housing Action Plans will outline the scale of impact (e.g., jurisdiction-wide, Downtown, Certain Neighborhood).

Essentially, an implementation plan details what, who, when, and how actions will be carried out. This process can refine and articulate each action and strategy in a way that clarifies the timelines, responsible parties, partners involved, resources/staff needs, prioritization, next steps or notes to keep in mind, and other information useful for advancing an action. In general, sequencing actions and strategies strategically can allow consideration of other complimentary efforts and actions, plan updates, and work priorities to support feasibility. This implementation detail helps to convert a housing action into an item that could be added to a work plan.

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Monitoring a Housing Action Plan

A monitoring plan helps articulate how to measure the performance towards completing actions supporting established goals or targets. The monitoring plan is an **optional** way to identify metrics or measures, including data guidance. The key state requirements regarding monitoring are outlined below. Jurisdictions must at a minimum report progress made on any of the strategies or changes that help to implement the Housing Action Plan, and any changes made to the plan during the three-year review. At this milestone, DOLA will review progress to determine whether the jurisdiction has made a good faith effort to adopt strategies or changes or if they have a plan for an alternative.

- ★ **Three years after adopting a Housing Action Plan, a local government shall report progress to the department regarding the adoption of any strategies or changes to local laws identified in the Housing Action Plan (C.R.S. 24-32-3705(6)).**
- ★ **The department shall not accept such a progress report, if the report does not demonstrate that the local government adopted the strategies and changes to local laws identified in the Housing Action Plan, unless the department determines that the local government has both made a good faith effort to adopt these strategies or changes to local law and has provided the department with a plan for the adoption of alternative strategies or changes to local laws. (C.R.S. 24-32-3705(6))**

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*Housing Action Plan Monitoring Tips**

- Jurisdictions can consider monitoring their progress and plan performance through a **report** (such as a scorecard). When applicable, information on **baseline conditions** helps describe changes. Collecting data about progress after Housing Action Plan adoption on an annual basis can lessen the burden when the three-year monitoring report is due.
- If resources are available, a jurisdiction could create a **dashboard** to communicate progress to elected officials and the public, like this [example housing dashboard from Kirkland, WA.](#)
- The monitoring report can **feature project spotlights** and other achievements in the community to help celebrate progress and demonstrate on-the-ground results.

*Example Monitoring Metrics for a Housing Action Plan***

General Goals	Range of Performance Metrics
Increase affordable housing units	<ul style="list-style-type: none">• Number of properties or units acquired/preserved for affordable housing (report by AMI). Number and description of affordable housing projects and partnership driven projects (describe partner contributions). <i>Potential Data Sources: Local Government</i>• Number of new affordable housing units built via affordable housing program incentives (e.g. an Inclusionary Housing/Zoning policy (report by AMI)). <i>Potential Data Sources: Local Government</i>• Number of requests the City and County receives for tenant assistance (waiting list information). <i>Potential Data Sources: Local Government</i>• Share of rent-burdened residents. <i>Potential Data Source: Census (ACS) and HUDs</i>

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General Goals	Range of Performance Metrics
Increase both market-rate and affordable housing production	<ul style="list-style-type: none"> Number and location of new housing units (overall housing production). Sometimes jurisdictions will track this through permitting data to get more detail on the type of housing or the number of bedrooms in the housing units. <i>Potential Data Sources: Local Government</i>
Increase housing options and choices	<ul style="list-style-type: none"> Number and type of new homes produced and total within the jurisdiction over time –location, tenure, size, sale price/asking rent, and unit type (ADUs, condos, apartment, duplex, triplex, quadplex, townhome, etc.) <i>Potential Data Sources: Local government, permitting</i>
Policy or Program Improvements	<ul style="list-style-type: none"> Track the adoption of different code amendments, planning efforts, and program changes proposed by the actions, documenting any shifts in the outcomes and the reasoning behind changes. Number of applicants asking about subject programs. Number of participants using subject programs and if applicable, the amount of funding allocated and demographic characteristics of recipients (e.g., downpayment assistance program). Feedback from users of programs. <p><i>Potential Data Source: Local Government</i></p>

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General Goals	Range of Performance Metrics
Permit Process and Fee Improvements	<ul style="list-style-type: none"> • Adoption of permit and fee improvements. • If the measure involves expediting a housing related permit process or reviewing permits within a certain timeframe, the number of permits reviewed, or share, and average time for permit approval from the time the application submission meets all requirements could be measured. • Feedback (interview or survey) from users of targeted permitting processes. <p><i>Potential Data Source: Local Government</i></p>
Partnership Projects	<ul style="list-style-type: none"> • Number and description of affordable housing projects and partnership driven projects. <p><i>Potential Data Source: Local Government and Partners</i></p>
Increase in education and awareness on housing topics	<ul style="list-style-type: none"> • Number of factsheets and educational materials released. • Number of meetings, training/educational workshops, events. • Number of participants, views to city website, requests for information. <p><i>Potential Data Source: Local Government</i></p>

Note: A broad range of metrics are listed above as examples. Metrics are typically narrowed down and matched to each jurisdiction's particular situation and capacity.

Housing Action Plan Guide

FOR COLORADO COMMUNITIES

May 2025



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Appendices

Appendix A: Example Outline for a Housing Action Plan and Tips

1. Introduction
 - Executive Summary (Purpose of the Plan, Background)
 - Highlights from the housing needs assessment
 - Overview of planning and summary of public engagement process and findings
2. Housing Goals
3. Housing Actions (organized by goals or type)
4. Implementation Plan
5. Monitoring Program
6. Appendices
 - a. Full housing needs assessment
 - b. Summary of community engagement findings

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Top Ten Housing Action Plan Tips

- **Engage proactively** and focus on inclusivity and activities welcoming diverse participation, providing insights helpful for understanding housing needs, challenges, and opportunities. The engagement can build up shared understanding for what the plan will strive for and address.
- **Provide education on housing needs** and why it is important to address them, linking to data and community stories (e.g., workforce impacts on businesses).
- **Build familiarity with housing plans** by providing targeted education for community members and by highlighting positive examples and case studies. Get in front of hot-button topics by having talking points ready to explain potential points of controversy in communities.
- **Clarify goals.** Align strategies to support goals and priorities relevant to the community and integrate community engagement to support this work.
- **Focus strategies.** Avoid adding more strategies than can be feasibly implemented within the jurisdiction's capacity. Instead focus on priorities and findings derived from strategy evaluation and refinement. There is no "silver bullet" for choosing a single housing strategy, as each idea brings benefits, drawbacks, different levels of impact, and tradeoffs. As such, housing strategies benefit from periodic evaluation as development conditions change.
- **Identify Partners.** Discuss how partners might be willing to support Housing Action Plan implementation and meet with them. Many Housing Action Plans include strategies involving partnerships or involving a partner leading an effort.
- **Create a plan customized to a specific community.** Evaluate each goal and strategy to ensure it is relevant to the jurisdiction, check for eligibility and appropriateness of different options, ensure they are informed by community engagement findings, and tailor the plan to fit the local conditions.
- **Recognize the Housing Market.** Consider the current market conditions and anticipated fluctuations. Evaluate how developers and investors will use new policies, programs, and tools to create housing in the community.
- **Monitor results to track progress and recognize shortcomings.** Proactively think about monitoring and where the data will come from (does the permit tracking need to be adjusted), and solicit feedback to spotlight areas in need of improvement. Celebrate achievements in monitoring reports, including a spotlight for projects. Allow time for the market to respond.
- **Plan ahead for implementation and future plan updates.** The implementation plan can facilitate action prioritization and the creation of a work plan for the next few years. Strategies not used but possibly helpful could be tracked to consider for future plan updates.

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Appendix B: Additional Resources and Definitions

Adequate Public Facilities, Public Services, and Water Supply

Unique local conditions mean that housing development may be limited by the availability of public facilities, services, water supply, and other infrastructure. Jurisdictions may choose to support affordable housing through strategies that facilitate new associated infrastructure or consider estimated housing needs within comprehensive planning elements. As DOLA develops guidance for Strategic Growth Elements and Water Supply Elements (to be released in fall 2025), jurisdictions can consider existing resources such as:

- [Water Planning Fact Sheet: Comprehensive Plan Elements](#) - Initial guidance on developing water supply and water quality goals, engagement with water providers, water conservation policies, and estimating water needs
- [C.R.S. 30-28-106 \(3\)\(a.5\) and 31-23-206 \(1.5\)](#) - Statutory language describing requirements for Strategic Growth Elements and Water Supply Elements in comprehensive plans

Additional Links to Resources

Colorado Housing Planning

- [C.R.S. 24-32-3705](#) - Colorado State statute that defines Housing Action Plan requirements
- DOLA Housing Plans: <https://dlg.colorado.gov/housing-plans>
- DOLA [Affordability and Displacement Mitigation Strategies Directory](#)
- Housing Needs Assessment Guide for Colorado Communities, DOLA: <https://drive.google.com/file/d/1O9-tcf1Yey6GGzvbwMROtrNYLjVG9-QY/view>

Comprehensive Plans

- Water supply elements in Comprehensive Plans: <https://dlg.colorado.gov/water-and-land-use-tips-requirements>

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Housing Planning Outside of Colorado

- Affirmatively further fair housing, Local Housing Solutions:
<https://localhousingsolutions.org/policy-objectives/affirmatively-furthering-fair-housing/>
- Washington State Housing Action Plan guidebook:
https://www.ezview.wa.gov/Portals/_1976/Documents/housing-resources/Guidance%20for%20Developing%20a%20Housing%20Action%20Plan_Public%20Review%20Draft_062420.pdf
- Washington State Housing Action Plan examples and resources:
https://www.ezview.wa.gov/site/alias_1976/37657/housing_action_plans.aspx
- Housing Choices Guide Book (Oregon):
www.oregon.gov/lcd/Publications/Housing-Choices-Booklet_DIGITAL.pdf

Housing Action Plan Eligibility Resources, Colorado

- [State Demography Office Population Resources](#) - Resources for checking current population and change over time for eligibility
- [Rural Resort Community Information](#) - Detail on definition and eligibility for rural resort community status

Middle Housing

- Middle housing, AARP:
www.aarp.org/livable-communities/housing/info-2020/missing-middle-housing/
(Expanding Middle Housing Options: A Guide to Local Middle Housing Regulations)
- Middle Housing photo examples:
www.aarp.org/livable-communities/housing/info-2020/slideshow-missing-middle-housing.html
- Missing Middle Housing Website - Opticos Design:
<https://missingmiddlehousing.com/>
- ADU Supportive Strategies, Colorado, DOLA:
https://docs.google.com/document/d/16WcA8VPT2BZQ5rux2VJT495TDGa_F3y8iulSWwHxgfl/edit?tab=t.0#heading=h.lx4qzmtkoc8d

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- ADUs AARP: www.aarp.org/livable-communities/housing/info-2019/Accessory-dwelling-units-adus/
- AARP Livable Communities. ADUs Are an American Tradition. <https://www.aarp.org/livable-communities/housing/info-2019/adus-are-an-american-tradition.html>
- AARP ABCs of ADUs. aarp.org/adu
- Habitat for Humanity Evidence brief: Affordable accessory dwelling units: www.habitat.org/our-work/impact/affordable-accessory-dwelling-units-evidence-brief
- This is what a street looks like 39 years after legalizing fourplexes - Sightline Institute: <https://www.sightline.org/2019/06/21/this-is-what-a-street-looks-like-39-years-after-legalizing-fourplexes/>
- Micro-Units - Another Tool in your Affordable Housing Toolbelt - MRSC: <https://mrsc.org/stay-informed/mrsc-insight/december-2019-1/micro-units-another-affordable-housing-tool>
- Visualizing Compatible Density - MRSC: <https://mrsc.org/stay-informed/mrsc-insight/april-2017/visualizing-compatible-density>
- Is Density Detrimental? - American Planning Association (APA): <https://www.planning.org/knowledgebase/resource/9122769/>

Public Engagement Resources

- Community-Driven Engagement for Community Planning, DOLA: <https://dlg.colorado.gov/community-driven-engagement-guide-for-community-planning>
- International Association for Public Participation, www.iap2.org
- Building Support for Affordable Housing: https://www.ezview.wa.gov/Portals/_1976/Documents/GuidanceReports/Building%20Support%20for%20Affordable%20Housing.pdf
- Myths and Facts About Affordable and High Density Housing: https://www.ezview.wa.gov/Portals/_1976/Documents/GuidanceReports/Myths%20%26%20Facts%20About%20Affordable%20%26%20High%20Density%20Housing.pdf

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- You Don't Have to Live Here:
https://www.ezview.wa.gov/Portals/_1976/Documents/GuidanceReports/You%20Don't%20Have%20to%20Live%20Here.pdf
- Enterprise Housing Playbook
https://www.ezview.wa.gov/Portals/_1976/Documents/GuidanceReports/Enterprise%20Housing%20Playbook.pdf
- Using Media Advocacy to Talk About Affordable Housing:
<https://www.bmsg.org/resources/publications/issue-16-moving-from-head-to-heart-using-media-advocacy-to-talk-about-affordable-housing/>

Strategies

- Affordable Housing Strategy Compliance Guidance:
https://docs.google.com/document/d/e/2PACX-1vS7a5F98oJyw7-zexeZA4x_TtEktJfxVxs7By7c6MmXsAngU-nl1jkz688bP2rAbkmGAekvlGfIT4/pub
- [Affordable Housing Toolkit for Local Officials](#) - A training resource including video and web content created through HB21-1271 to promote innovative solutions to affordable housing development in Colorado. This guide is aimed at increasing understanding for local officials and providing tools to respond to housing challenges.
- [Innovative Affordable Housing Strategies](#) - An inventory of qualifying affordable housing strategies for HB21-1271, including factsheets for individual strategies. These resources support local governments particularly around meeting land use goals related to affordable housing development.
- Transforming underutilized church properties for affordable housing (American Planning Association, 2023):
<https://www.planning.org/planning/2023/spring/transforming-empty-churches-into-affordable-housing-takes-more-than-a-leap-of-faith/>
- Form-based Codes Defined - Form-Based Code Institute:
<https://formbasedcodes.org/definition/>
- What is a Form-based Code? - Planners web:
<https://plannersweb.com/2014/12/fbc1/>
- Legalizing the Tiny House - Sightline Institute:
<https://www.sightline.org/2016/06/27/legalizing-the-tiny-house/>

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Transit Oriented Communities

- [C.R.S. 24-35-203](#) - State statute that defines Transit Oriented Community requirements
- [Transit Oriented Communities Overview](#) - Resource hub for implementation and list of subject jurisdictions
- [Transit Oriented Communities Guidance](#) - Detailed user guide for compliance with state requirements

Universal Design and Visitability

- AARP HomeFit Guide and Universal Design.
aarp.org/livable-communities/housing/info-2020/homefitguide.html
- Goehner, A.L. “Universal Design and Visitability.” AARP Livable Communities.
aarp.org/livable-communities/housing/info-2021/visitability-and-universal-design-in-sarasota-county-florida.html

Definitions and Terminology

Accessory Dwelling Units (ADUs): ADUs are also referred to as mother-in-law apartments, second units, carriage houses, or granny flats. ADUs are located on a parcel with a primary single-family home and tend to be smaller in scale than the primary single-family home. Subject to local regulations, ADUs may be located either inside, attached to, or detached from the primary home and can be designed to blend in with an existing primary home. ADUs contain all the basic facilities needed for living independent from the primary residence such as a kitchen and bathroom. ADUs can be created through new construction, an addition, or a remodel converting part of a home such as a garage or basement. ADUs can play a role in providing more housing options in existing neighborhoods by allowing homeowners to build additional unit(s) on their lots. This traditional home type is re-emerging as an affordable and flexible housing option that meets the needs of older adults and young families alike. Generally, by June 30, 2025, Subject Jurisdictions must allow one ADU where Single-Unit Detached Dwellings are allowed. Subject Jurisdictions must use an

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Administrative Approval Process for ADUs, cannot require parking or owner occupancy (with limited exceptions), must allow certain ADU sizes and setbacks, and generally cannot otherwise restrict ADUs through design and dimensional standards that are more stringent than those that apply to Single-Unit Detached Dwellings in the same district. Requirements in the law also apply to planned unit developments (PUDs) and homeowners associations (HOAs) within Subject Jurisdictions. Please reference C.R.S. 29-35-402 through 405 and the below sections and linked documents for additional specifics and details.

Affordable Housing: The U.S. Department of Housing & Urban Development (HUD) defines housing as affordable if its occupants pay no more than 30 percent of their income for rent and utilities or for mortgage, taxes, and insurance. Generally, the term “affordable housing” is used to describe regulated housing units that have income- or rent-restrictions to ensure the housing is occupied by households earning a certain threshold of the area median family income (MFI). The definition of affordability must be based on Area Median Income (AMI) data that is published annually by the US Department of Housing and Urban Development (HUD).

Comprehensive Plans (Strategic Growth): DOLA provides guidance on Comprehensive Plan requirements at: <https://dlg.colorado.gov/housing-plans>. Municipal, county, and regional comprehensive plans must include a strategic growth element and a water supply element in the first comprehensive plan amendment occurring on/after January 1, 2026, and no later than December 31, 2026. Required for all comprehensive plans adopted/amended after December 31, 2026. As designated in SB24-174, water supply and strategic growth elements will be required in all municipal, county, and regional master/comprehensive plans except:

- Municipalities, counties, and regions are not required to include a strategic growth element if they have not received funding to do so AND are:
 - Municipalities with a population of 20,000 or less and have experienced negative population change, or with a population of 2,000 or less

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- Counties with population of 20,000 or less and have experienced negative population change, or have a population of 5,000 or less in the county's unincorporated territory

Community-Driven Engagement: Community-driven engagement is a key tool for ensuring our programming benefits Coloradans equitably, expanding community engagement and developing extensive practices to incorporate all voices, particularly those of disproportionately impacted community members, improves project outcomes, reduces negative impacts, fosters partnership and collaboration, and taps into the community's wisdom as a whole, improving governance across the board. Through several years of community-driven practices at DOLA, we have begun incorporating an expectation of community engagement into our funding guidelines, technical assistance, and best local government practices. The DOLA community-driven engagement guide is intended to assist local agencies in the development of best practices for community engagement, not only through formal requirements for specific grant-funded projects, such as a comprehensive plan, but also to encourage good governance through robust public participation in ongoing activity such as annual budgeting, capital improvement planning, and policy creation. More information at:

<https://dlg.colorado.gov/community-driven-engagement-guide-for-community-planning>

Cost-burdened: According to the U.S. Department of Housing & Urban Development (HUD, 2007), households who pay more than 30% of their income for housing are considered cost- burdened. Households who pay more than 50% of their income for housing are considered severely cost-burdened and may have trouble affording basic necessities such as food, clothing, transportation, and medical care.

Displacement means leaving your home or relocating your business because the property is being redeveloped, or the costs of living or doing business become unaffordable due to price increases or loss of income. People can be displaced from a community when they are unable to access available housing or commercial space due

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to pressures such as unfair practices or discrimination, language barriers, or because it is not accessible to people with disabilities. Displacement also means the feeling that residents or businesses in a community need to move because of a declining sense of belonging in their neighborhood, the loss of neighbors or community assets, or the loss of a customer base. The root causes of displacement are both the pressures that push people or communities out and the conditions that make it hard for them to stay.

- Per C.R.S. 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 demo 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.

Housing Planning Grant Program: The Housing Planning Grant Program enacted by SB24-174 (§§ 24-32-3701 – 24-32-3711) intends to provide grants to local governments and regional entities to help them better understand their housing needs and to develop actionable and compliant housing needs assessments , housing action plans, and comprehensive plan elements. Round 2 will open June 9, 2025. Grant funds may support the development of a new Housing Needs Assessment, Housing Action Plan, or Strategic Growth element of a comprehensive plan. Grant funds can also support the revision of an existing Housing Needs Assessment, Housing Action Plan, or Strategic Growth element to comply with the requirements of SB24-174 (§§ 24-32-3701 –

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24-32-3711). More information at:

<https://dlg.colorado.gov/housing-planning-grant-program>

Inclusionary zoning (IZ): IZ provides affordable housing for low to moderate-income residents in exchange for additional residential development capacity (i.e., an increase in what the zoning currently allows such as density, height, floor area ratio or some other benefit). Over 500 cities in the US use IZ; however, the programs vary from being voluntary or mandatory and some work in conjunction with Multifamily Tax Exemption Programs. In theory, private market-rate development supports some portion of the cost of the affordable units in an inclusionary project. However, in almost all cases, public incentives are also required. These incentives can be regulatory (reduced parking requirements or density bonuses, for example) or financial (public investment). Key benefits: Creates new affordable units in targeted areas, designed to lead to mixed-income projects, and possibly could require less public investment. IZ often works best in areas with high density residential capacity and with strong residential markets. Key drawbacks: IZ does not work unless market-rate development is feasible, if incentives are insufficient to offset program requirements then the developers can charge more for the market-rate housing which could push up the overall rental costs, and the program can be complex to administer.

Median Income Level, Area Median Income Level (AMI), Median Family Income Level (MFI): When examining household income levels, the Area Median Income (AMI) and Median Family Income (MFI) are helpful benchmarks for understanding what different households can afford to pay for housing expenses. Since housing needs vary by family size and costs vary by region, the U.S. Department of Housing and Urban Development (HUD) produces MFI benchmarks for different family sizes and regions on an annual basis. AMI means the same thing as MFI but is more commonly used in the industry. These benchmarks help determine eligibility for housing programs and support the tracking of different housing needs for a range of household incomes.

Middle Housing: Middle housing is a term for homes that are at a middle scale between detached single-family houses and large multifamily complexes but generally

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are more similar in scale to single-detached homes than to apartment buildings. Examples include: duplexes, triplexes, fourplexes, fiveplexes, sixplexes, courtyard apartments, cottage clusters, and townhomes. These types are typically “house-scale”; that is, the buildings are about the same size and height as detached houses. Middle housing has gained recent attention because it tends to be less costly, more energy efficient, and require less land per household than single-detached homes.

Parking Minimums: The Legislative Declaration of HB24-1304 emphasizes that minimum off-street parking requirements restrict the amount of housing that can be built on many sites, and that many parking spaces in residential developments often go unused. Minimum parking requirements that exceed what is necessary for the residents and visitors not only increases the cost of housing but also lowers development density, which is associated with higher vehicle ownership, more vehicle miles traveled, more greenhouse gas emissions, and reduced walking and bicycling. By June 30, 2025, for areas in metropolitan planning organizations (MPOs) and at least partially within Applicable Transit Service Areas, local governments must not enact or enforce local laws requiring minimum parking for multifamily residential, adaptive reuse for residential, or adaptive reuse for mixed use that is at least 50% residential. The guidance in the sections that follow summarizes the key requirements of HB24-1304 but is not a substitute for a close reading of the law itself. More information at: <https://dlg.colorado.gov/parking-minimums>.

Transit-Oriented Communities: The law states that its goals are to “(a) increase opportunities to construct housing near transit in order to provide benefits including Regulated Affordable Housing, accessible housing, regional equity through a balance of jobs and housing, improved and expanded transit service, and multimodal access to daily needs within Mixed-Use Pedestrian-Oriented Neighborhoods; and (b) increase opportunities for housing production by providing appropriate Zoning Capacity Buffers.” (C.R.S. 29-35-203(2)) Subject jurisdictions (termed “Transit-Oriented

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Communities”(TOCs)) include those within metropolitan planning organizations that are:

- Municipalities with more than 4,000 residents AND more than 75 acres of Transit Areas
- Counties with more than 4,000 residents AND more than 75 acres of Transit Areas
- Unincorporated areas (a) within $\frac{1}{2}$ mile of light rail or commuter rail stations and (b) within $\frac{1}{4}$ mile of transit corridors and surrounded by municipalities
- Local governments that are not TOCs can opt in by designating Neighborhood Centers to be eligible for the TOC infrastructure grant program.

TOCs must analyze areas near high-frequency transit to identify a Housing Opportunity Goal based on a formula in the law, then locally designate Transit Centers (i.e., areas that allow denser residential uses) and ensure that their local land use laws within those areas cumulatively allow sufficient Zoning Capacity to meet the Housing Opportunity Goal. More information at:

<https://dlg.colorado.gov/transit-oriented-communities>.

Last Updated: June 30, 2025



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PROFESSIONAL SERVICES AGREEMENT

THIS AGREEMENT is entered into as of this _____ day of _____, 2025, by and between the Town of Ridgway, State of Colorado, hereinafter referred to as "Town" and _____, hereinafter referred to as "Contractor".

In consideration of the mutual covenants and obligations herein expressed, it is agreed by and between the parties hereto as follows:

1. SCOPE OF SERVICES

Contractor agrees to perform services in accordance with the Scope of Services attached hereto as Exhibit "A" and incorporated herein by this reference.

2. TIME OF COMPLETION

The services to be performed pursuant to this Agreement by Contractor shall be initiated upon execution of this Agreement, shall be pursued with due diligence thereafter, and shall be continued until December 31, 2025, unless terminated prior.

3. PROFESSIONAL RESPONSIBILITY

Contractor shall complete the services with the care and skill ordinarily used by members of the subject profession practicing under similar circumstances at the same time and in the same locality ("Standard of Care"), and shall be responsible for the professional quality, timely completion and coordination of all services as outlined in Exhibit A and shall without additional compensation promptly remedy and correct any errors, omissions or other deficiencies, which do not meet the Standard of Care as set by the Town. Contractor is solely responsible for the timing, means and methods of performing the work. Contractor shall meet or exceed industry standards applicable to the services and shall provide for all training and education needed and provide all tools necessary to perform the services. Contractor shall comply with all applicable laws.

4. TOWN'S RESPONSIBILITIES

The Town shall provide necessary direction and make decisions, including prompt review of Contractor's submittals, and carry out its other responsibilities in a timely manner so as not to delay Contractor's performance of its services.

The Town shall be responsible for all requirements and instructions that it furnishes to Contractor pursuant to this Agreement, and for the accuracy and completeness of all programs, reports, data, and other information furnished by the Town to Contractor pursuant to this Agreement. Contractor may use and rely upon such requirements, programs, instructions, reports, data, and information in performing or furnishing services under this Agreement, subject to any express limitations or reservations applicable to the furnished items.



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5.

RELEASE AND INDEMNIFICATION

Contractor hereby waives any claims for damage to Contractor's property or injury to Contractor's person against the Town, its officers, agents and employees arising out of the performance of the services under this Agreement, unless damage or injury was caused by the Town's negligence. To the fullest extent permitted by law, the Contractor agrees to indemnify and hold harmless the Town, and its officers and its employees, from and against all liability, claims, and demands, on account of any injury, loss, or damage, which arise out of or are connected with the Services, if such injury, loss, or damage, or any portion thereof, is caused by, or claimed to be caused by, the negligent act, omission, or other fault of the Contractor or any subcontractor of the Contractor, or any officer, employee, or agent of the Contractor or any subcontractor, or any other person for whom Contractor is responsible. The Contractor shall investigate, handle, respond to, and provide defense for and defend against any such liability, claims, and demands, and to bear all other costs and expenses related thereto, including court costs and attorneys' fees. The Contractor's indemnification obligation shall not be construed to extend to any injury, loss, or damage which is caused by the act, omission, or other fault of the Town.

To the fullest extent permitted by Laws and Regulations, the Town and Contractor waive against each other, and the other's officers, directors, members, partners, agents, employees, subconsultants, and insurers, any and all claims for or entitlement to special, incidental, indirect, or consequential damages arising out of, resulting from, or in any way related to this Agreement or the Project, from any cause or causes. Such excluded damages include but are not limited to loss of profits or revenue; loss of use or opportunity; loss of good will; cost of substitute facilities, goods, or services; and cost of capital.

6.

WORKER'S COMPENSATION

Contractor shall obtain statutorily required Worker's compensation insurance to cover Contractor's employees and provide the Town a certificate of such insurance. Contractor hereby agrees to release, waive, save, hold harmless, defend and indemnify the Town, its officers, agents or employees on account of any claims arising under the Worker's compensation laws of the State of Colorado on behalf of Contractor or any of Contractor's employees, subcontractors or subcontractor's employees.

7.

PAYMENT

The Contractor shall perform the Scope of Services and shall invoice the Town for work performed based on _____ performance benchmarks: 1), 2), 3), 4), and 5). Total compensation shall not exceed _____, to be paid in _____ installments according to the performance benchmarks and fee schedule described in Exhibit A.

The Contractor shall submit invoices and requests for payment in a form acceptable to the Town. Invoices shall not be submitted more often than once each month unless otherwise approved by this Agreement or in writing by the Town. Unless otherwise



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directed or accepted by the Town, all invoices shall contain sufficient information describing the completion of each performance benchmark and applicable “project coordination and administration” expenses for the Services during the stated period of the invoice. Following receipt of a Contractor’s invoice, the Town shall promptly review the Contractor’s invoice and remit payment within 30 days.

8. TOWN REPRESENTATIVE

The Town hereby designates its Town Manager, or her designee as its representative and authorizes her to make all necessary and proper decisions with reference to this Agreement.

9. INDEPENDENT CONTRACTOR

The services to be performed by the Contractor are those of an independent contractor and not as an employee of the Town. As an independent contractor, Contractor is not entitled to worker's compensation benefits except as may be provided by the independent contractor nor to unemployment insurance benefits. The Contractor is obligated to pay all federal and state income tax on any moneys paid pursuant to this Agreement.

10. ASSIGNMENT

This Agreement may not be assigned nor subcontracted by either party without the written consent of the other party. Provided, however, Contractor shall arrange for substitute service in those instances when Contractor is not able to perform the services due to temporary absence.

11. INSURANCE

The Contractor agrees to procure and maintain, at its own cost, a policy or policies of insurance. The Contractor shall not be relieved of any liability, claims, demands, or other obligations assumed pursuant to the Contract Documents by reason of its failure to



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procure or maintain insurance, or by reason of its failure to procure or maintain insurance in sufficient amounts, duration, or types.

Contractor shall procure and maintain the insurance coverages listed below. Such coverages shall be procured and maintained with forms and insurers acceptable to Town. All coverages shall be continuously maintained from the date of commencement of services hereunder.

- A. Worker's Compensation insurance to cover obligations imposed by the Worker's Compensation Act of Colorado and any other applicable laws for any employee engaged in the performance of work under this contract.
- B. Commercial general liability insurance with combined single limits of one million dollars (\$1,000,000) each occurrence and one million dollars (\$1,000,000) aggregate. The policy shall be applicable to all premises and operations. The policy shall include coverage for bodily injury, broad form property damage (including completed operations), personal injury (including coverage for contractual and employee acts), blanket contractual, independent contractors, products, and completed operations.
- C. Comprehensive Automobile Liability insurance with combined single limits for bodily injury and property damage of five hundred thousand dollars (\$500,000) each occurrence and five hundred thousand dollars (\$500,000) aggregate with respect to each of Contractor's owned, hired and non-owned vehicles assigned to or used in performance of the services.

The policies required above, except of the Worker's Compensation insurance, shall be endorsed to include the Town and the Town's officers and employees as additional insureds. Every policy required above shall be primary insurance and any insurance carried by the Town, its officers, or its employees, shall be excess and not contributory insurance to that provided by Contractor. The Contractor shall be responsible for any deductible losses under any policy required above.

Certificates of insurance shall be completed by the Contractor's insurance agent as evidence that policies providing the required coverages and minimum limits are in full force and effect, and shall be reviewed and approved by the Town prior to commencement. The Town reserves the right to request and receive a certified copy of any policy.

Failure on the part of the Contractor to procure or maintain policies providing the required coverages, conditions, and minimum limits shall constitute a material breach of contract upon which the Town may immediately terminate this contract, or at its discretion Town may procure or renew any such policy or any extended reporting period



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thereto and may pay any and all premiums in connection therewith, and all monies so paid by the Town shall be repaid by Contractor to the Town upon demand, or the Town may offset the cost of the premiums against any monies due to Contractor from the Town.

The parties hereto understand and agree that the Town is relying on, and does not waive or intend to waive by any provision of this contract, the monetary limitations (presently \$350,000 per person and \$990,000 per occurrence) or any other rights, immunities, and protections provided by the Colorado Governmental Immunity Act, C.R.S. § 24-10-101 *et seq.*, as from time to time amended.

12. **CONTRACTOR OPERATIONS**

Contractor shall provide services as set forth in Exhibit A.

Contractor shall establish and maintain an office in where service may be obtained and complaints rendered, utilizing regular business hours (8AM to 5 PM), Monday through Friday. During off hours, telephone inquiries shall be received either by voice mail or through an answering service.

All personnel of the Contractor involved with the services of the Contractor to the Town shall be courteous and respectful at all times. Personnel driving Contractor's vehicles shall each at all times possess and carry the appropriate Colorado Commercial Drivers License ("CDL") for the particular type of vehicle or equipment operated. The Town may request the removal or transfer of any employee of the Contractor who violates the provisions hereof, or who is wanton, negligent or discourteous in the performance of such duties.

Contractor shall not use a firm name containing "Town of Ridgway" or other words which could imply municipal ownership.

13. **BREACH AND TERMINATION**

All terms and conditions of this Agreement are considered material and failure to perform any of said conditions on be considered a breach of this Agreement. In such event, either party may notify the other of the breach, in which case there shall be a thirty day opportunity to cure the breach, except for failure to provide service which must be corrected within 3 days. If the breach is not cured the non-breaching party may have recourse to any and all remedies provided by law, including damages, specific performance, and termination of the contract.

14. **REMEDIES**

- A. In addition to any other remedies provided for in this Agreement, and without limiting its remedies available at law, the Town may exercise the following remedial actions if the Contractor substantially fails to perform the duties and obligations of this Agreement. Substantial failure to perform the duties and obligations of this Agreement shall mean a significant, insufficient, incorrect, or



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improper performance, activities or inactions by the Contractor. The remedial actions include:

- a. Suspend the Contractor's performance pending necessary corrective action as specified by the Town without the Contractor's entitlement to an adjustment in any charge, fee, rate, price, cost, or schedule; and/or
- b. Withhold payment to the Contractor until the necessary services or corrections in performance are satisfactorily completed; and/or
- c. Deny payment for those services which have not been satisfactorily performed, and which, due to circumstances caused by the Contractor, cannot be performed, or if performed would be of no value to the Town; and/or
- d. Terminate this Agreement in accordance with this Agreement.

B. The foregoing remedies are cumulative and the Town, in its sole discretion, may exercise any or all of the remedies individually or simultaneously.

15. **RECORDS AND OWNERSHIP**

- A. Retention and Open Records Act Compliance. All records of the Contractor related to the provision of Services hereunder, including public records as defined in the Colorado Open Records Act ("CORA"), and records produced or maintained in accordance with



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this Agreement, are to be retained and stored in accordance with the Town's records retention and disposal policies. Those records which constitute "public records" under CORA are to be at the Town offices or accessible and opened for public inspection in accordance with CORA and Town policies. Public records requests for such records shall be processed in accordance with Town policies. Contractor agrees to allow access by the Town and the public to all documents subject to disclosure under applicable law. Contractor's willful failure or refusal to comply with the provisions of this Section shall result in the immediate termination of this Agreement by the Town. For purposes of CORA, the Town Clerk is the custodian of all records produced or created as a result of this Agreement. Nothing contained herein shall limit the Contractor's right to defend against disclosure of records alleged to be public.

- B. Town's Right of Inspection. The Town shall have the right to request that the Contractor provide to the Town a list of all records of the Contractor related to the provision of Services hereunder retained by the Contractor in accordance with this subsection and the location and method of storage of such records. Contractor agrees to allow inspection at reasonable times by the Town of all documents and records produced or maintained in accordance with this Agreement.
- C. Ownership. Any work product, materials, and documents produced by the Contractor pursuant to this Agreement shall become property of the Town of Ridgway upon delivery and shall not be made subject to any copyright by the Contractor unless authorized by the Town. Other materials, statistical data derived from other clients and other client projects, software, methodology and proprietary work used or provided by the Contractor to the Town not specifically created and delivered pursuant to the Services outlined in this Agreement shall not be owned by the Town and may be protected by a copyright held by the Contractor and the Contractor reserves all rights granted to it by any copyright. The Town shall not reproduce, sell, or otherwise make copies of any copyrighted material, subject to the following exceptions: (1) for exclusive use internally by Town staff and/or employees; or (2) pursuant to a request under the Colorado Open Records Act, § 24-72-203, C.R.S., to the extent that such statute applies; or (3) pursuant to law, regulation, or court order. The Contractor waives any right to prevent its name from being used in connection with the Services. The Contractor may publicly state that it performs the Services for the Town. The Town acknowledges that such Documents are not intended or represented to be suitable for use on the Project unless completed or reviewed by the Contractor, or for use or reuse by the Town or others on extensions of the Project, on any other project, or for any other use or purpose, without written verification or adaptation by Contractor. Any such use or reuse, or any modification of the Documents, without written verification, completion, or adaptation by Contractor, as appropriate for the specific purpose intended, will be at the Town's sole risk and without liability or legal exposure to Contractor or to its officers, directors, members, partners, agents, employees, and Subconsultants.
- D. Return of Records to Town. At the Town's request, upon expiration or termination of



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this Agreement, all records of the Contractor related to the provision of Services hereunder, including public records as defined in the CORA, and records produced or maintained in accordance with this Agreement, are to be returned to the Town in a reasonable format and with an index as determined and requested by the Town.

16. **MISCELLANEOUS**

A. Governing Law and Venue. This Agreement shall be governed by the laws of the State of Colorado, and any legal action concerning the provisions hereof shall be brought in Ouray County, Colorado.



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B. No Waiver. Delays in enforcement or the waiver of any one or more defaults or breaches of this Agreement by the town shall not constitute a waiver of any of the other terms or obligations of this Agreement.

C. Integration. This Agreement constitutes the entire agreement between the Parties, superseding all prior oral or written communications.

D. Severability. If any provision of this Agreement is found by a court of competent jurisdiction to be unlawful or unenforceable for any reason, the remaining provisions hereof shall remain in full force and effect.

E. Modification. This Agreement may only be modified upon written agreement signed by the Parties.

F. Assignment. Neither this Agreement nor any of the rights or obligations of the Parties hereto, shall be assigned by either Party without the written consent of the other.

G. Affirmative Action. The Contractor warrants that it will not discriminate against any employee or applicant for employment because of race, color, religion, sex or national origin. The Contractor warrants that it will take affirmative action to ensure applicants are employed, and employees are treated during employment without regard to their race, color, religion, sex or national origin. Such action shall include, but not be limited to the following: employment, upgrading, demotion or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship.

H. Governmental Immunity. The Town, its officers, and its employees, are relying on, and do not waive or intend to waive by any provision of this Agreement, the monetary limitations or any other rights, immunities, and protections provided by the Colorado Governmental Immunity Act, C.R.S. § 24-10-101, *et seq.*, as amended ("CGIA"), or otherwise available to the City and its officers or employees. Presently, the monetary limitations of the CGIA are set at three hundred eighty-seven thousand dollars (\$387,000) per person and one million ninety-three thousand dollars (\$1,093,000) per occurrence for an injury to two or more persons in any single occurrence where no one person may recover more than the per person limit described above.

I. Binding Effect. The Parties agree that this Agreement, by its terms, shall be binding upon the successors, heirs, legal representatives, and assigns; provided that this Section XII shall not authorize assignment.

J. No Third-Party Beneficiaries. Nothing contained in this Agreement is intended to or shall create a contractual relationship with, cause of action in favor of, or claim for relief for, any third party, including any agent, sub-consultant or subcontractor of



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Contractor. Absolutely no third-party beneficiaries are intended by this Agreement. Any third party receiving a benefit from this Agreement is an incidental and unintended beneficiary only.

K. Release of Information. The Contractor shall not, without the prior written approval of the City, release any privileged or confidential information obtained in connection with the Services or this Agreement.

L. Attorneys' Fees. If the Contractor breaches this Agreement, then it shall pay the City's reasonable costs and attorney's fees incurred in the enforcement of the terms, conditions, and obligations of this Agreement.

M. Survival. The provisions of Sections VI (Independent Contractor), VII (Insurance), VIII (Indemnification) and XII (A) (Governing Law and Venue), (J) (Rights and Remedies), (K) Annual Appropriation), (N) (Release of Information) and (O) Attorneys' Fees, shall survive the expiration or termination of this Agreement.

N. Agreement Controls. In the event a conflict exists between this Agreement and any term in any exhibit attached or incorporated into this Agreement, the terms in this Agreement shall supersede the terms in such exhibit.

O. Force Majeure. Neither the Contractor nor the City shall be liable for any delay in, or failure of performance of, any covenant or promise contained in this Agreement, nor shall any delay or failure constitute default or give rise to any liability for damages if, and only to extent that, such delay or failure is caused by "force majeure." As used in this Agreement, "force majeure" means acts of God, acts of the public enemy, acts of terrorism, unusually severe weather, fires, floods, epidemics, quarantines, strikes, labor disputes and freight embargoes, to the extent such events were not the result of, or were not aggravated by, the acts or omissions of the non-performing or delayed party.

P. Protection of Personal Identifying Information. In the event the Services include or require the City to disclose to Contractor any personal identifying information as defined in C.R.S. § 24-73-101, Contractor shall comply with the applicable requirements of C.R.S. §§ 24-73-101, et seq., relating to third-party services providers.

Q. Authority. The individuals executing this Agreement represent that they are expressly authorized to enter into this Agreement on behalf of the Town and the Contractor and bind their respective entities.

R. Counterparts. This Agreement may be executed in one or more counterparts, each of which shall constitute an original and all of which shall constitute one and the same document. In addition, the Parties specifically acknowledge and agree that electronic signatures shall be effective for all purposes, in accordance with the provisions of the Uniform Electronic Transactions Act, Title 24, Article 71.3 of the Colorado Revised



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Statutes.

17. DATE

This Agreement is dated _____, 2025.

18. EMPLOYMENT OF "ILLEGAL ALIENS"

The following provisions are required by Colorado Revised Statutes §8-17.5-102, as amended. The term "illegal alien" is used as it is referenced in the above Statutes and is not a term chosen or endorsed by the Town.

- A. Contractor shall not knowingly employ or contract with an illegal alien to perform work under this Agreement.
- B. Contractor shall not enter into a contract with a Subcontractor that fails to certify to the Contractor that the Subcontractor shall not knowingly employ or contract with an illegal alien to perform work under this Agreement.
- C. Contractor has confirmed the employment eligibility of all employees who are newly hired for employment to perform work under this agreement through participation in either (1) the e-verify program, (the electronic employment verification program created in Public Law 104-208 as amended and expanded in Public Law 108-156, as amended, and jointly administered by the US Department of Homeland Security and the Social Security Administration, or its successor program) or (2) the Department Program (the employment verification program established pursuant to CRS §8-17.5-102(5)(c)).
- D. Contractor is prohibited from using the e-verify program or the Department program procedures to undertake pre-employment screening of job applicants while this Agreement is being performed.
- E. If the Contractor obtains actual knowledge that a Subcontractor performing work under this Agreement knowingly employs or contracts with an illegal alien, the Contractor shall be required to: (a) notify the Subcontractor and the Town within three days that the Contractor has actual knowledge that the Subcontractor is employing or contracting with an illegal alien; and (b) terminate the subcontract with the Subcontractor if within three days of receiving the notice required pursuant to (a) of this paragraph (E), the Subcontractor does not stop employing or contracting with the illegal alien; except that the Contractor shall not terminate the contract with the Subcontractor if during such three days the Subcontractor provides information to establish that the Subcontractor has not knowingly employed or contracted with an illegal alien.



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- F. Contractor shall comply with any reasonable request by the Department of Labor and Employment in the course of an investigation that the Department is undertaking pursuant to CRS §8-17.5-102(5).
- G. If Contractor violates these illegal alien provisions, the Town may terminate this Agreement for a breach of contract. If this Agreement is so terminated, Contractor shall be liable for actual and consequential damages to the Town. The Town will notify the Office of the Secretary of State if Contractor violates these provisions and the Town terminates this Agreement for that reason.
- H. Contractor shall notify the Town of participation in the Department program and shall within 20 days after hiring an employee who is newly hired for employment to perform work under this Agreement affirm that the contractor has examined the legal work status of such employee, retained file copies of the documents required by 8 USC §1324a and not altered or falsified the identification documents for such employee. Contractor shall provide a written, notarized copy of the affirmation to the Town.

19. **APPROPRIATION REQUIRED**
This Agreement shall NOT be construed to constitute a debt of the Town beyond any current fiscal year and shall be subject to the availability of an annual appropriation therefore by the Town.

TOWN OF RIDGWAY

By _____
John I. Clark,
Mayor

ATTEST:

Pam Kraft,
Town Clerk

CONTRACTOR:

By _____

Name, Title