



Addendum to:
Brighton Housing Needs Assessment

Addendum Report / May 2026



GRUEN GRUEN + ASSOCIATES

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1. Introduction

This report by Gruen Gruen + Associates (“GG+A”) serves as an Addendum to the City of Brighton’s Housing Needs and Incentive Strategies Assessment, previously completed in October 2023 (the “2023 HNA”). Since completion of the original assessment, the State of Colorado enacted Senate Bill 24-174 (“SB 24-174”), the Sustainable Affordable Housing Act, which substantially expands statutory requirements for local housing planning. The legislation establishes enhanced standards for both Housing Needs Assessments and Housing Action Plans, including additional analytical topics, updated datasets, and clearer documentation of housing constraints and displacement risks.

In 2025, the Colorado Department of Local Affairs (“DOLA”) issued the City of Brighton a conditional approval of the 2023 HNA. In its correspondence, DOLA identified a series of required and recommended updates that, if addressed, would bring the housing needs assessment into “substantial conformity” with SB 24-174. The key required topics include:

- Needs for accessible and visitable housing units;
- Needs for supportive housing units; and a
- Displacement risk assessment.

A required estimate of jobs by salary or wage level is also provided within this Addendum. Additionally, recommended data and guidance are provided about homelessness and market limitations affecting housing production. Therefore, the intent of this Addendum is to provide all updated analysis and documentation addressing the required or recommended items identified by DOLA. Water supply–related outputs, which were also recommended under SB 24-174, are to be addressed within the City of Brighton’s Comprehensive Plan and are therefore not evaluated within this Addendum.

NEXT STEPS

Under Colorado SB 24-174, the Housing Needs Assessment establishes the data-driven foundation for understanding current and future housing needs, affordability gaps, and displacement risks. The next step is development of a Housing Action Plan, which translates the assessment findings into prioritized strategies, policies, and investments to address identified housing challenges and advance Brighton’s housing goals.

2. Accessible and VISIBLE Housing Needs

INTRODUCTION

The 2023 HNA recognized the distinct housing needs of older adult households, noting that demographic aging would increase demand for housing that supports aging in place. The HNA advised the city to “anticipate a commensurate need to remodel or rehabilitate homes to facilitate aging in place.”

Consistent with the expanded analytical requirements of SB 24-174, this section provides a more detailed and quantitative assessment of housing needs related to accessible and visitable units. The analysis focuses on the prevalence of mobility-related disabilities that most directly affect housing accessibility and evaluates the extent to which Brighton’s housing stock should accommodate these needs.

DEFINITIONS

“Accessible Housing” or an “Accessible Unit” means housing that satisfies the requirements of the federal Fair Housing Act and incorporates universal design. Universal design is further defined as a dwelling unit designed and constructed to be safe and accessible for any individual regardless of age or abilities.

“Visitable Housing” or a “Visitable Unit” means a dwelling unit that a person with a disability can enter, move around the primary entrance floor of, and use the bathroom in.

DISABILITIES AND HOUSING NEEDS

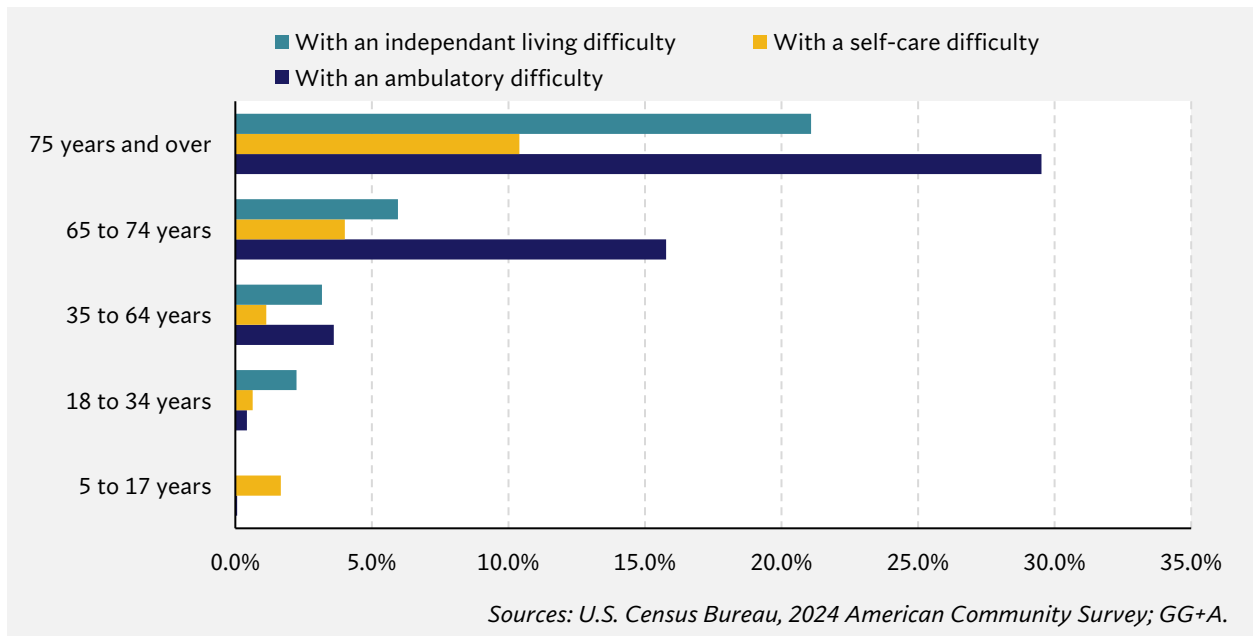
An estimated 4,141 Brighton residents, or approximately 10 percent of the noninstitutionalized population, experience at least one type of disability. Based on 2024 American Community Survey (“ACS”) estimates for Brighton, ambulatory and independent living difficulties are the most prevalent forms of disability among residents.

Ambulatory disabilities refer to mobility-related limitations that can significantly affect an individual’s ability to safely and independently navigate traditional residential environments. Features that may otherwise be considered minor (e.g., steps at building entrances, distant parking) can render a unit functionally inaccessible.

Many residents with mobility limitations may also have an independent living difficulty — which refers to challenges completing basic day-to-day tasks such as running errands or leaving home for a doctor's appointment.

Housing needs among older adults are particularly influenced by the prevalence of disability within this population. Figure 2-1 summarizes data from the most recent 2024 ACS estimates, illustrating the share of residents with specific types of disabilities and highlighting the increasing incidence of mobility-related limitations with age.

FIGURE 2-1: Percent of Brighton Population with Housing-Related Disabilities



Approximately 16 percent of residents between the ages of 65 and 74 report ambulatory difficulties. Nearly 30 percent of residents age 75 or older report ambulatory difficulties.

As summarized in Table 2-1 below, an estimated 11.0 percent of all households in Brighton include at least one member with an ambulatory (mobility-related) limitation. These households span all income levels, though prevalence varies meaningfully by income.

TABLE 2-1: Brighton Households with Ambulatory Limitations

	Total Households (2018-2022)	Household Member has Ambulatory Limitation	Share of Households
Income ≤ 30% AMI	1,630	360	22.1%
Income > 30% and ≤ 50% AMI	1,880	280	14.9%
Income > 50% and ≤ 80% AMI	2,530	195	7.7%
Income > 80% AMI	7,180	625	8.7%
Total	13,220	1,455	11.0%

Sources: HUD, 2018-2022 CHAS Data; Gruen Gruen + Associates.

Households earning below 30 percent of AMI exhibit the highest incidence of ambulatory limitations, with 22.1 percent of households in this income range affected. Households earning between 30 percent and 50 percent of AMI also show a relatively high prevalence (14.9 percent). In contrast, ambulatory limitations are less common among higher-income households, affecting about 8.5 percent of households earning above 50 percent of AMI. Despite the lower rate, higher-income households account for a meaningful share of affected households due to their larger overall population.

ESTIMATE OF ACCESSIBLE AND VISITABLE HOUSING NEED

The estimate of accessible and visitable housing need first relies upon the identified share (11.0 percent) of households with at least one member experiencing a mobility-related limitation. This share is then applied to the current number of households in Brighton to estimate the number of households likely to require accessible or visitable housing. To translate household need into unit demand, a five percent (5%) frictional vacancy factor is applied, reflecting a normal level of housing market turnover and mobility.

Finally, given the margin of error inherent in ACS and HUD disability estimates, results are presented as a planning range ($\pm 25\%$) to account for statistical uncertainty while still providing clear guidance for future policy or implementation.

The estimates presented in Table 2-2 reflect the share of the current housing inventory that should incorporate accessibility or visitability features.

TABLE 2-2: Accessible and Visitable Housing Need Estimate

	Number of Units Needed	Percent of Housing Stock ¹
Low – High Range ²	1,320 – 2,200	7.7% – 12.8%
Total Estimated Need (Median)	1,760	10.2%
¹ As of year-end 2025, the City of Brighton contained 17,228 total housing units according to city estimates.		
² Average estimate bracketed by ± 25 percent (consistent with Margin of Error for residents and households experiencing ambulatory difficulties).		
<i>Source: Gruen Gruen + Associates</i>		

Brighton is estimated to require approximately 1,760 accessible or visitable housing units, representing about 10.2 percent of the total housing stock. Accounting for uncertainty in the underlying disability estimates, the plausible need ranges from about 1,320 to 2,200 units, or 7.7 to 12.8 percent of existing housing units.

Accessible and visitable housing features range from fully accessible unit designs that accommodate daily mobility needs to visitable elements, such as step-free entrances and accessible main-floor bedroom and bathroom facilities. In multifamily settings, meeting these needs frequently requires elevator-served buildings and other ADA-compliant design features for common areas.

ACCESSIBLE/VISITABLE NEED RELATIVE TO EXISTING SUPPLY

The exact number of housing units that meet accessibility or visitability standards is difficult to quantify without detailed, unit-level inspections. However, several indicators help frame the likely supply.

Approximately 20 percent of Brighton’s single-family homes were built prior to 1970. These older homes are generally less likely to include features that accommodate individuals with mobility-related disabilities.

At the same time, more recent construction is more likely to incorporate accessibility features. The federal Fair Housing Act (“FHA”), implemented in 1991, requires certain accessibility standards in multifamily housing with four or more units — specifically, all units in elevator-served buildings and ground-floor units in non-elevator buildings.

Based on Adams County Assessor and building permit data, Brighton includes approximately 2,700 multifamily units built since 1992 in buildings with four or more units, many of which are likely subject to FHA accessibility requirements. The city’s single-family housing stock also includes approximately 4,800 single-story (“ranch”) homes, a form typically more conducive to visitability because primary living spaces and restroom facilities are located on the first floor.

Taken together, the age distribution and structural characteristics of Brighton’s housing stock suggest that the number of units that are accessible or visitable likely exceeds the estimated range of need of 1,320 to 2,200 units. While there may not be a citywide “unmet” need, targeted modifications to older homes and housing units — such as retrofits or accessibility upgrades that improve usability and safety for occupants or visitors with mobility challenges — may be necessary to ensure that some existing residents can continue to safely occupy their homes or units.

3. Supportive Housing Needs

INTRODUCTION

Under Colorado Senate Bill 24-174, “supportive housing” refers to housing that combines financial assistance with voluntary supportive services to help stabilize individuals experiencing homelessness or housing insecurity. This includes permanent supportive housing, which pairs long-term housing with ongoing services such as case management, behavioral health care, and tenancy support.

To estimate the supportive housing need in Brighton, data were provided by Almost Home, Inc. (“Almost Home”), including recent client caseloads and system-level data from the Colorado Homeless Management Information System (“HMIS”). These data were supplemented by input gathered through multiple discussions with the Brighton Housing Authority, Almost Home, and School District 27J.

HOMELESSNESS AND HOUSING INSTABILITY IN BRIGHTON

The homelessness response system in Brighton integrates case management, prevention assistance, and housing stabilization services, delivered primarily by Almost Home, Inc. and in coordination with Adams County programs and other local service providers.

Recent program data indicate that 46 households (83 individuals) are currently experiencing homelessness in Brighton, with an additional 82 households (257 individuals) identified as at risk of homelessness. Outreach teams conducted 404 street contacts in 2025, reflecting ongoing engagement with unsheltered individuals and efforts to connect them to housing and services.

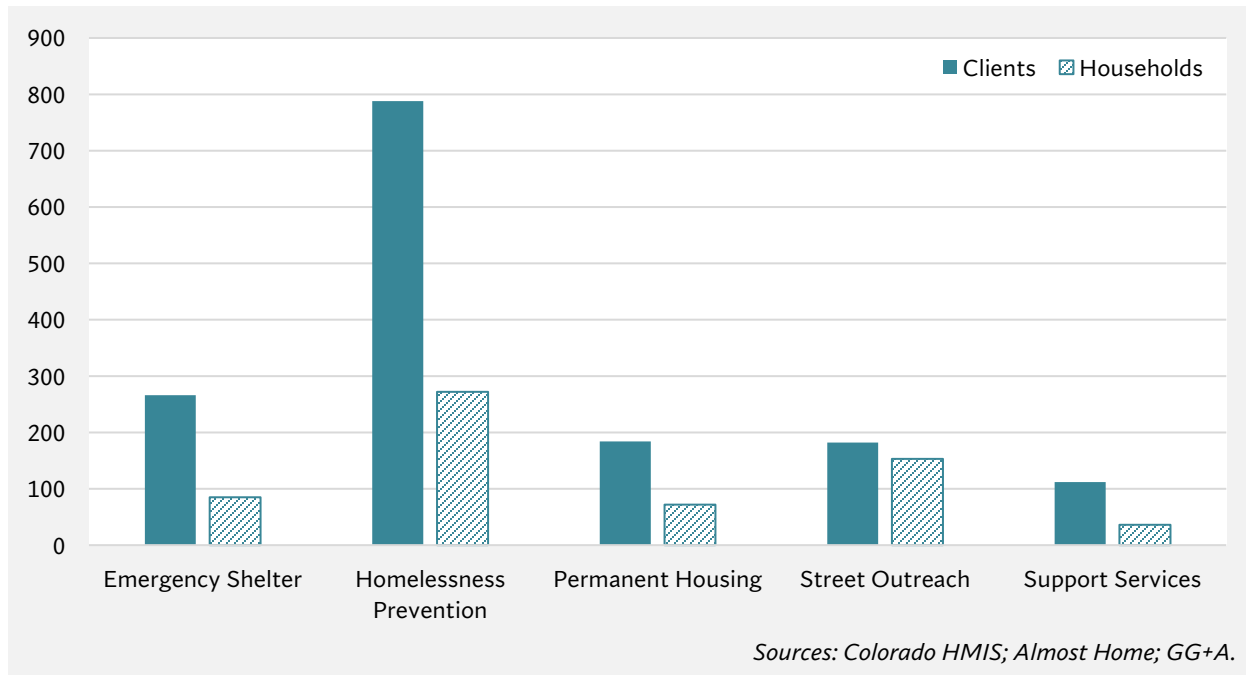
Program outcomes indicate strong performance in both prevention and housing placement:

- **Prevention effectiveness:** Among households receiving rental, mortgage, or utility assistance, 99 percent remained housed at least 90 days after assistance, demonstrating the effectiveness of short-term financial support in preventing displacement.
- **Housing placement outcomes:** Approximately two-thirds of families exiting shelter programs secured permanent housing, while 50 percent of households in Rapid Rehousing programs achieved permanent housing placement.
- **High-acuity interventions:** The Respite Housing program reported a 93 percent exit rate to permanent housing, indicating strong outcomes for households with more complex service needs.

At the same time, demand for services is increasing. Providers report rising requests for assistance, particularly among older adults, along with broader growth in applications for rental, mortgage, and utility support. Almost Home receives roughly 500 applications per month from Adams County residents for financial assistance but does not have capacity to meet all the requests.

Figure 3-1 summarizes the frequency of homelessness interventions, shelter and permanent housing placements, and other services within Brighton for 2025.

FIGURE 3-1: Homelessness Interventions and Service in Brighton (2025)



Homelessness prevention programs (primarily in the form of short-term, limited duration financial assistance) served nearly 800 individuals in 2025. During the same period, approximately 270 individuals accessed emergency shelter for stays of at least 60 days, including at a 7-unit permanent shelter operated by Almost Home as well as placements in local hotels and motels. In total, 184 individuals (72 households) were successfully rehoused into permanent housing.

Overall, while locally available housing programs are generating positive outcomes for participating households, resources remain limited. At the same time, increasing demand — particularly among older adults — indicates a sustained and growing need for expanded homelessness prevention, housing stabilization, and supportive housing units and services.

McKinney-Vento Counts

Table 3-1 summarizes students identified as experiencing homelessness under the McKinney-Vento Homeless Assistance Act within Brighton schools served by School District 27J for the 2025–26 school year. Under this federal definition, students are considered homeless if they lack a fixed, regular, and adequate night-time residence. This includes not only those in shelters or unsheltered conditions, but also students staying in motels, vehicles, or temporarily “doubled up” with other households. Representatives of School District 27J indicate that most students eligible under McKinney-Vento are doubled-up, living in temporary housing situations without any formal lease or occupancy agreement. As a result, McKinney-Vento data capture both visible and less visible housing instability and are widely used as an indicator of need among families with children.

TABLE 3-1: School District 27J Homeless Student Counts

	PK-12 Pupil Membership ¹	Homeless Count	Homeless Share
Elaine S. Padilla Elementary School	646	7	1.1%
Brighton High School	1,722	31	1.8%
Bromley East Charter School	1,206	13	1.1%
Mary E. Pennock Elementary School	606	8	1.3%
Northeast Elementary School	528	18	3.4%
Overland Trail Middle School	569	16	2.8%
South Elementary School	373	19	5.1%
Southeast Elementary School	534	31	5.8%
Vikan Middle School	531	23	4.3%
Subtotal	6,715	166	2.5%
¹ Statistics presented for the 2025-26 school year.			
Sources: Colorado Department of Education; School District 27J; Gruen Gruen + Associates.			

Across nine Brighton schools reporting McKinney-Vento counts, 166 of 6,715 students were identified as experiencing homelessness — approximately 2.5 percent, or about one in every forty students. Rates vary by school, with higher shares observed at several elementary and middle schools, including Southeast Elementary (5.8%), South Elementary (5.1%), Vikan Middle (4.3%), and Northeast Elementary (3.4%). Brighton High School reports the largest number of students (31), though a lower share of total enrollment (1.8%).

Higher rates at elementary schools suggest that housing instability may disproportionately affect families with younger children, underscoring a potential need for family-oriented supportive housing. Variation across schools also suggests geographic clustering of need within certain neighborhoods (particularly, the historical core neighborhoods of Brighton). The presence of high

school students experiencing homelessness also points to the needs of older youth, including some who may be unaccompanied or transitioning to independent living.

While informative, McKinney-Vento data likely understate the full extent of housing instability, as some families are not identified or do not report their circumstances. Even so, the identification of 166 students implies that dozens of Brighton households with school-age children face acute housing challenges at any given time, supporting a need for supportive housing and stabilization resources serving several dozen families communitywide.

CONTRIBUTING FACTORS AND CHRONIC HOMELESSNESS

The primary drivers of homelessness in Brighton mirror regional trends, with disability, behavioral health challenges, and domestic violence playing central roles. Among these, domestic violence and changes of “family status” are two leading contributors for women and families in Brighton. In 2025 for example, women comprised nearly 60 percent of individuals served by Almost Home — a trend that has been persistent overtime.

Program data show that 291 households (406 individuals) experiencing homelessness report a disabling condition, highlighting the significant role of physical and health-related barriers to housing stability. Behavioral health needs are also prevalent, with 174 households (222 individuals) reporting mental health conditions and 44 households (46 individuals) reporting substance use challenges. These factors frequently overlap, increasing the difficulty of securing and maintaining housing without supportive services.

Chronic homelessness represents a substantial subset of need. A total of 69 households (96 individuals) met the definition of chronically homeless in 2025, reflecting prolonged or repeated episodes of homelessness, often coupled with a disabling condition. This population typically requires more intensive interventions, including permanent supportive housing, case management, and behavioral health services.

Together, these trends underscore the need for a coordinated response that expands supportive housing capacity, integrates behavioral health services, and provides targeted resources particularly for women and families with children.

ESTIMATE OF SUPPORTIVE HOUSING NEED

Permanent supportive housing needs are estimated based on the size and composition of the population experiencing homelessness or at high risk of homelessness who may require ongoing, housing-linked services. Drawing on 2025 caseload data from Almost Home, Inc. and observed service utilization patterns, approximately 210 individuals are estimated to fall into this category and may be candidates for permanent supportive housing.

This population estimate is translated into unit demand based on household composition assumptions.

- **Singles, youth, and couples:** 70 individuals, assuming an average household size of 1.25, equating to approximately 56 units.
- **Families:** 140 individuals, assuming an average household size of 3.0, equating to approximately 47 units.

In total, the base estimate is approximately 103 supportive housing units. To account for normal turnover and ensure availability, a five percent (5%) frictional vacancy factor is applied, increasing the estimated need to approximately 108 units, as summarized below in Table 3-2.

TABLE 3-2: Supportive Housing Need Estimate

	Number of Units	Percent of Housing Stock ¹
Total Estimated Need	108	0.6%
<i>¹ As of year-end 2025, the City of Brighton contained 17,228 total housing units according to city estimates.</i>		
<i>Source: Gruen Gruen + Associates</i>		

The estimate of existing supportive housing need represents roughly 0.6 percent of Brighton’s total housing stock (17,228 units as of year-end 2025). This estimate is intended as a planning-level approximation of current need rather than a precise forecast.

SUPPORTIVE NEED RELATIVE TO EXISTING SUPPLY

Brighton currently lacks any permanently supportive housing with on-site services, making the estimated need of 108 units an unmet need. Meeting this need does not necessarily require entirely new construction; it can be addressed through a combination of new development, acquisition and rehabilitation of existing units, or conversion of existing housing paired with on-site supportive services.

4. Displacement Risk Assessment

INTRODUCTION

Table 4-1 presents a set of displacement risk indicators for the city of Brighton, developed in alignment with guidance from DOLA. The analysis draws on widely used, publicly available datasets, including the U.S. Census Bureau’s American Community Survey (“ACS”) 5-year estimates and HUD’s Comprehensive Housing Affordability Strategy (“CHAS”) data.

The demographic, socioeconomic, and housing indicators included in Table 4-1 are commonly associated with increased vulnerability to displacement. However, no single indicator is predictive on its own, and many are interrelated. Displacement risk is most pronounced where multiple vulnerabilities overlap, either at the individual (person) or neighborhood level. Accordingly, these indicators are intended to identify areas where risk factors converge, rather than to isolate any single cause of displacement.

Results are presented at both the citywide level (Table 4-1) and for Census tracts located wholly or partially within Brighton (Table 4-2). These metrics can be periodically updated as new ACS and CHAS data are released, allowing the city to track changing conditions and emerging displacement risks over time.

TABLE 4-1: Displacement Risk Measures

Metric	Citywide	Description
Households < 30% AMI	12.3%	Percent of total households with income below 30% AMI
Households < 50% AMI	26.6%	Percent of total households with income below 50% AMI
Households < 80% AMI	45.7%	Percent of total households with income below 80% AMI
Low income + severely cost-burdened households	13.0%	Percent of total households which are both: (a) Low income (<80% AMI); and (b) severely housing cost-burdened (spending more than 50% of pre-tax income on housing)
Renter households	28.5%	Percent of total households that rent their housing
Affordable (lower cost) rental units	11.3%	Percent of all occupied units rented for gross rent <\$1,500 per month ¹
Pre-1970 housing stock	20.0%	Percent of total housing units built prior to 1970
Mobile homes	2.9%	Percent of total housing units reported to be mobile homes
Overcrowded households	4.1%	Percent of total households with >1.0 occupants per room
Low educational attainment	13.0%	Percent of adult population (Age 25+) with no high school diploma
Racial or ethnic minorities	50.5%	Percent of the total population identifying as Hispanic or as a race other than White alone
Population with a disability	10.0%	Percent of noninstitutionalized population with a disability
English language barriers	7.9%	Percent of population (Age 5+) that speaks English less than "very well"
Single-parent households	11.3%	Percent of total households with: (a) own or related children under 18 years; and (b) no spouse present
¹ As of 2024, a monthly gross rent of \$1,500 was affordable to about 62% AMI for a two-person household.		
Sources: U.S. Census Bureau, 2020-2024 American Community Survey; U.S. Department of Housing and Urban Development, 2018-2022 CHAS data; Gruen Gruen + Associates.		

DISPLACEMENT RISK FACTORS

Income and Housing Cost Vulnerability

A substantial share of Brighton households face income-related vulnerability to displacement. Approximately 45.7 percent of households earn below 80 percent of AMI, including 26.6 percent below 50 percent AMI and 12.3 percent below 30 percent AMI. About 13 percent of all households are both low-income and severely cost-burdened, meaning they spend more than half of their pre-tax income on housing.

Displacement risk generally increases as income declines. Extremely low-income households (<30% AMI) have minimal capacity to absorb increases in rent or utility costs. Very low-income households (<50% AMI) face similar constraints and often rely on limited affordable or subsidized housing options. Even households earning between 50 and 80 percent of AMI may remain financially fragile, as they often do not qualify for assistance yet are still sensitive to rising costs or income disruptions. Households that are both low-income and severely cost-burdened are among the most vulnerable, with little ability to withstand even modest increases in housing expenses.

Housing Tenure and Market Exposure

Housing tenure and market dynamics further shape displacement risk. Renters comprise 28.5 percent of Brighton households and are generally more exposed to rent increases, lease non-renewals, and eviction than homeowners. At the same time, only about 11 percent of the citywide housing stock consists of lower-cost rental units (under \$1,500 per month), most of which are not income-restricted and could be lost through future renovation or repositioning.

Characteristics of the existing housing stock also contribute to risk. Approximately 20 percent of units were built prior to 1970, making them more likely to be both relatively affordable and susceptible to reinvestment, rehabilitation, or functional obsolescence. Mobile homes, which account for about three percent of the housing stock, present additional vulnerability due to factors such as land tenure arrangements and exposure to redevelopment or rising lot rents. Overcrowded households — often reflecting informal or “doubled up” living situations — face heightened risk as they typically lack stable tenancy arrangements and have limited relocation options.

Socioeconomic Vulnerability

Several demographic and socioeconomic factors further influence displacement risk. Brighton’s population includes a significant share of residents who may face structural challenges affecting housing stability, including racial and ethnic minorities (approximately 51 percent of the population), individuals with disabilities (10.0 percent), single-parent households (11.3 percent), and residents with limited English proficiency (7.9 percent).

These characteristics are typically associated with reduced housing mobility and increased vulnerability to displacement. Lower educational attainment can limit income growth and employment flexibility, while households with disabilities may face additional constraints related to accessibility and service needs. Language barriers can also restrict access to housing and support services. Single-parent households often have fewer financial resources and higher cost burdens, while communities of color have historically experienced disproportionate displacement pressures.

CONCENTRATION OF DISPLACEMENT RISK

Table 4-2 summarizes displacement risk measures calculated for each Census Tract, and Map 4-1 illustrates relative displacement risk using a composite index, where the citywide average is standardized to 1.0. The index assigns equal weight to 14 indicators representing income, housing costs, tenure patterns, housing age, and selected demographic characteristics.

Each indicator is calculated as a ratio of the tract-level percentage to the corresponding citywide percentage. For example, if low-cost rental units comprise 10 percent of the housing stock citywide but 20 percent within a specific tract, that tract receives a score of 2.0 for that indicator. This calculation is performed for all 14 measures, and the resulting scores are averaged to produce a single composite index value for each tract. A score of 1.0 indicates that a tract mirrors the overall citywide profile across the included indicators.

As shown in Map 4-1, lower-risk tracts (index values ranging from 0.40 to 0.83) exhibit consistently lower concentrations of displacement-related characteristics relative to citywide conditions. Moderate-risk tracts (0.92 to 1.24) generally reflect conditions comparable to, or moderately exceeding, the citywide average. Higher-risk tracts (1.41 to 1.85) demonstrate elevated concentrations across multiple indicators, resulting in notably higher composite scores.

Note that the index represents **relative concentration, rather than absolute conditions**. Higher index values indicate neighborhoods where displacement risk factors are more concentrated compared to the citywide average, while lower values reflect comparatively lower concentrations of these characteristics.

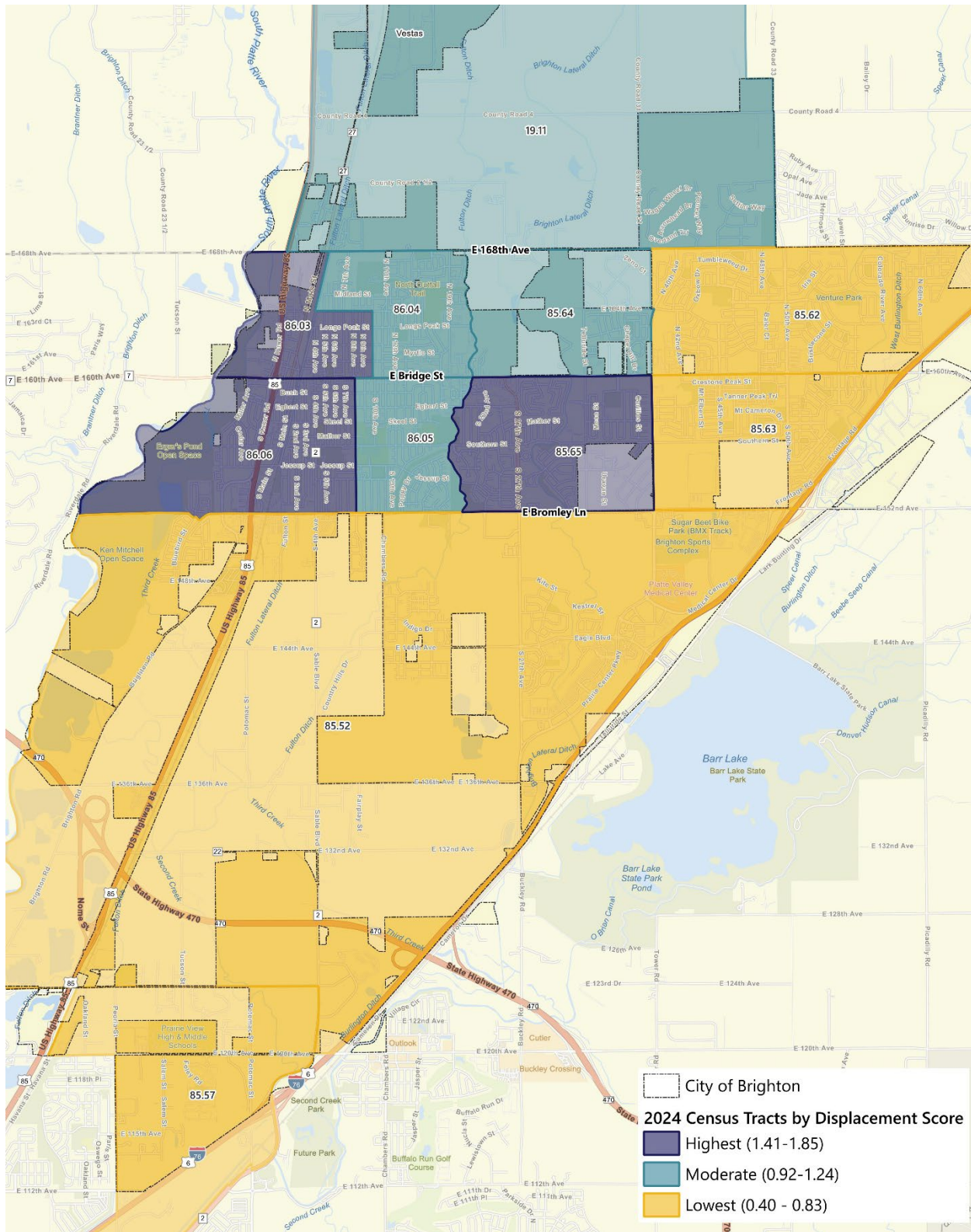
TABLE 4-2: Displacement Risk Metrics by Census Tract

Metric	Tract 85.52*	Tract 85.57*	Tract 85.62	Tract 85.63	Tract 85.64	Tract 85.65
Households < 30% AMI	12.0%	1.2%	5.2%	8.1%	7.3%	17.6%
Households < 50% AMI	22.6%	12.9%	9.9%	17.2%	32.9%	31.2%
Households < 80% AMI	44.1%	20.3%	17.8%	33.4%	47.6%	54.1%
Low income + severely cost-burdened households	12.5%	5.6%	9.1%	11.8%	31.7%	18.3%
Renter households	46.3%	15.4%	5.8%	9.6%	9.8%	17.5%
Affordable (lower cost) rental units	7.1%	1.1%	1.0%	1.8%	1.6%	8.6%
Pre-1970 housing stock	14.6%	12.3%	0.0%	2.1%	24.1%	22.4%
Mobile homes	2.0%	0.0%	0.0%	0.0%	8.5%	11.5%
Overcrowded households	2.0%	0.0%	0.0%	4.0%	4.2%	4.5%
Low educational attainment	11.2%	13.0%	6.8%	8.9%	6.3%	11.1%
Racial or ethnic minorities	43.1%	52.3%	41.5%	48.2%	23.3%	51.6%
Population with a disability	8.2%	5.7%	8.1%	5.9%	9.0%	11.9%
English language barriers	2.4%	3.6%	4.1%	7.5%	7.8%	8.3%
Single-parent households	9.2%	14.1%	8.5%	14.9%	13.5%	11.3%
Composite Index Score ¹	0.83	0.50	0.40	0.64	1.07	1.28
<i>¹ A score of 1.0 indicates that a tract mirrors the overall citywide profile across the included indicators.</i>						
<i>*Majority of Census Tract population resides outside of Brighton city limits.</i>						
<i>Sources: U.S. Census Bureau, 2020-2024 American Community Survey; U.S. Department of Housing and Urban Development, 2018-2022 CHAS; GG+A.</i>						

TABLE 4-2 — CONTINUED: Displacement Risk Metrics by Census Tract

Metric	Tract 86.03	Tract 86.04	Tract 86.05	Tract 86.06	Tract 19.11*
Households < 30% AMI	34.4%	9.2%	14.1%	9.7%	30.4%
Households < 50% AMI	54.8%	18.0%	24.5%	39.6%	35.7%
Households < 80% AMI	74.4%	52.0%	45.8%	56.4%	43.3%
Low income + severely cost-burdened households	27.3%	13.6%	9.7%	6.9%	35.7%
Renter households	56.1%	38.7%	20.9%	49.5%	3.2%
Affordable (lower cost) rental units	32.2%	5.4%	3.8%	20.3%	2.0%
Pre-1970 housing stock	31.6%	36.6%	57.7%	57.7%	22.3%
Mobile homes	3.1%	0.0%	2.2%	3.2%	9.4%
Overcrowded households	6.4%	0.7%	9.3%	7.2%	0.0%
Low educational attainment	25.2%	13.3%	9.7%	25.1%	10.0%
Racial or ethnic minorities	62.7%	58.0%	49.5%	51.3%	45.5%
Population with a disability	11.9%	11.0%	12.0%	12.6%	22.4%
English language barriers	15.5%	7.8%	12.6%	10.3%	6.3%
Single-parent households	22.6%	12.7%	12.5%	10.8%	5.4%
Composite Index Score ¹	1.85	0.92	1.17	1.41	1.24
<i>¹ A score of 1.0 indicates that a tract mirrors the overall citywide profile across the included indicators.</i>					
<i>*Majority of Census Tract population resides outside of Brighton city limits.</i>					
<i>Sources: U.S. Census Bureau, 2020-2024 American Community Survey; U.S. Department of Housing and Urban Development, 2018-2022 CHAS; GG+A.</i>					

MAP 4-1: Relative Displacement Risk Scores by Census Tract



5. Additional Information

MARKET LIMITATIONS AND FEASIBILITY GAPS

State guidance encourages jurisdictions to evaluate the market and regulatory conditions that shape their ability to produce and preserve housing — particularly affordable and supportive housing. Although no single methodology is prescribed, the 2023 HNA emphasized that identifying constraints related to land use and zoning regulations, infrastructure capacity, development costs, and financing conditions is essential to developing a housing strategy that is both feasible and implementable (see Chapters 9 and 10, *Housing Development Economics*).

The 2023 HNA concluded that, under prevailing market conditions at the time, unassisted private housing development was not financially feasible at many of the affordability levels needed in Brighton for both ownership and rental housing. Specifically:

- **Ownership housing:** Without public subsidy or other assistance, private development of new ownership housing was generally not feasible at prices affordable to households earning below 120 percent of AMI.
- **Rental housing:** Similarly, unassisted private development of new rental housing was not likely feasible at rent levels affordable to households earning below 90 percent of AMI.

More recent shifts in AMI levels and softening market rents suggest that this feasibility threshold for rental housing may now be closer to approximately 80 percent of AMI. However, because both income levels and market conditions fluctuate over time, these thresholds should be understood as dynamic rather than fixed.

These findings underscore a persistent structural gap between housing costs and achievable price points, indicating that market-rate development alone is unlikely to supply housing affordable to large segments of Brighton’s workforce and lower-income households without ongoing policy intervention or subsidy.

Limits of Local Policy Levers

While local policy and zoning adjustments — such as changes to allowable density, parking requirements, or review processes — can improve development feasibility at the margin, fundamental market/financial barriers and construction defects legislation remain the primary constraints on housing production.

High Development Costs

Escalating development costs represent a significant barrier to housing production. Since the 2023 HNA was prepared, development costs across the Denver metropolitan area have continued to rise. Recent data from CHFA indicate that new affordable multifamily housing projects in Metro Denver (funded in 2024 or 2025) incurred average total development costs of nearly \$467,000 per unit. With an average unit size of approximately 1.5 bedrooms, this equates to more than \$310,000 per bedroom.

Cost pressures stem from multiple sources, including higher construction labor and material prices, rising land, water, and predevelopment costs, increased infrastructure and dedication requirements, and more complex regulatory and compliance obligations. These elevated costs make projects difficult to finance even when multiple subsidy sources are layered, discourage developer participation in both market-rate and affordable housing projects, and limit the total number of units that can be produced with largely fixed funding sources. In an environment of scarce affordable housing resources, these dynamics disproportionately constrain the development of income-restricted and supportive housing. The Housing Action Plan (“HAP”) will be intended to further address some of these constraints.

Feasibility Gaps and Subsidy Implications

Housing production gaps or “feasibility gaps” refer to housing price points, and therefore income levels, that the private market cannot viably supply through new construction. These gaps illustrate the widening disconnect between what it costs to build housing and what lower-income households can afford to pay. As shown in Table 5-1, rental apartments affordable at 60 percent of AMI generate rental revenues that support a stabilized value well below current development costs.

TABLE 5-1: Updated Feasibility Gaps at 60% AMI

	1-Bedroom Apartment	2-Bedroom Apartment	Average
Affordable Monthly Gross Rent (60% AMI)	\$1,576	\$1,891	\$1,734
Less: Utility Allowance and Operating Expense	(\$621)	(\$983)	(\$802)
Monthly Net Operating Income (60% AMI)	\$851	\$908	\$880
Stabilized Value of 60% AMI Unit¹	\$157,100	\$167,600	\$162,350
Land and Water Dedication	\$40,000	\$40,000	\$40,000
Permit and Impact Fees ²	\$30,000	\$33,000	\$31,500
Site and Building Construction	\$225,000	\$300,000	\$262,500
Other Soft/Financing Costs	\$51,800	\$60,800	\$56,300
Total Development Cost	\$346,800	\$433,800	\$390,300
Feasibility Gap of 60% AMI Unit	\$189,700	\$266,200	\$227,950
¹ Assumes 5% rent increase upon lease-up of the apartment development. Stabilized value reflects a minimum 6.5% “yield” on the net operating income, which in today’s interest rate environment, is roughly the cost of debt.			
² Based on current 2026 City of Brighton fee schedule for multi-family housing developments.			
³ Feasibility gap equals difference between stabilized value and total development cost.			
Sources: Colorado Housing and Finance Authority; CoStar; City of Brighton; Gruen Gruen + Associates.			

While rents at this affordability level can sustain an average unit value of approximately \$162,000 for one- and two-bedroom apartments, total development costs approach \$390,000 per unit, driven by land and water dedication requirements, construction costs, fees, and other soft and financing costs.

The resulting average feasibility gap of approximately \$228,000 per apartment unit represents the level of subsidy or cost offset required to make new construction financially viable at 60 percent of AMI. This gap is not an outlier or short-term condition; rather, it reflects the structural condition of today’s housing market. As such, the production of affordable rental housing in Brighton will continue to depend on meaningful public investment, tax credits, regulatory relief, and other forms of support to bridge the gap between development costs and affordable rents.

FUTURE HOUSING NEED BY TENURE

Table 5-2 presents Brighton’s 10-year housing need projection, reorganized by income level and tenure, consistent with DOLA’s recommended format. The table allocates the total 10-year housing need from the 2023 HNA across owner and rental units within five income bands, expressed as percentages of Area Median Income (AMI), and shows how future need is expected to vary by both affordability level and tenure type. The total 10-year need includes workforce, non-workforce, and replacement housing needs previously identified in the 2023 HNA.

TABLE 5-2: Brighton 10-Year Housing Need¹ by Tenure and Income Level

	Owner		Rental		Total	
	# Units	% of Tot	# Units	% of Tot	# Units	% of Tot
Income <30% AMI	105 ²	3.2	270	8.2	375	11.4
Income 30-50% AMI	265 ²	8.1	340	10.4	605	18.4
Income 50-80% AMI	290	8.8	190	5.8	480	14.6
Income 80-120% AMI	450	13.7	180	5.5	630	19.2
Income >120% AMI	920	28.0	275	8.4	1,195	36.4
Total	2,030	61.8	1,255	38.2	3,285	100.0

¹ Rounded to nearest five (5) units.
² Many older adult and non-workforce households already own housing free and clear of any debt. Lower incomes below 50 percent of AMI may not be an indication of affordable (below-market) housing needs among this cohort.

Source: Gruen Gruen + Associates

Over the 10-year planning period, the total projected housing need in Brighton is unchanged at approximately 3,285 housing units. Owner-occupied units comprise about 62 percent (2,030 units) of total need and rental units accounting for the remaining 38 percent (1,255 units).

Extremely low-income households show a pronounced need for rental housing. Households earning below 30 percent AMI account for an estimated 375 units, nearly three-quarters of which are rental units. Some of these future needs will be correlated to permanent supportive rental housing needs.

Similarly, households earning 30–80 percent AMI are projected to need 1,085 units, with rental housing again representing the majority share. Together, these income groups reflect the city’s greatest affordable rental housing needs. Approximately 530 units of rental housing are needed over 10 years within this 30-80 percent of AMI income band.

Moderate income households, earning between 80-120 percent of AMI, are associated with 630 units of future need. About 71 percent of this need (450 units) is for owner-occupied housing. At the upper end of the income spectrum, households earning above 120 percent AMI account for the largest single share of projected housing demand, totaling 1,195 units. This future need is

predominantly for owner-occupied housing, reflecting market-rate ownership and household purchasing capacity.

JOBS BY SALARY LEVEL

Table 5-3 summarizes the required estimate of jobs by wage level in Brighton, reflecting the most recent available data.

TABLE 5-3: Brighton Employment Base by Industry and Wage Level

	Estimated Number of Jobs ¹	Share of Total Jobs	Average Annual Wage ²
Agriculture, Forestry, Fishing & Hunting	28	0.2%	\$45,600
Mining	86	0.5%	\$130,900
Utilities	104	0.6%	\$121,100
Construction	854	4.7%	\$84,100
Manufacturing	731	4.0%	\$76,100
Wholesale Trade	465	2.5%	\$92,400
Retail Trade	2,360	12.9%	\$44,900
Transportation and Warehousing	396	2.2%	\$67,500
Information	397	2.2%	\$96,400
Finance and Insurance	300	1.6%	\$98,400
Real Estate and Rental and Leasing	178	1.0%	\$71,700
Professional and Technical Services	738	4.0%	\$116,300
Management of Companies and Enterprises	37	0.2%	\$138,100
Administrative and Waste Services	707	3.9%	\$52,600
Educational Services	2,963	16.2%	\$94,200
Health Care and Social Assistance	2,258	12.4%	\$78,700
Arts, Entertainment, and Recreation	106	0.6%	\$32,200
Accommodation and Food Services	1,863	10.2%	\$32,100
Other Services, Excl/ Public Admin.	423	2.3%	\$55,300
Public Administration	3,278	17.9%	\$84,700
Total Employment Base	18,272	100.0%	\$74,300

¹ 2023 estimates from LEHD Origin-Destination Employment Statistics, specific to City of Brighton.
² 2024 Quarterly Census of Employment and Wages (“QCEW”) estimates for Adams County.
Sources: U.S. Census Bureau; Colorado Department of Labor and Employment; Gruen Gruen + Associates.

The city’s total employment base includes approximately 18,272 jobs, with an average annual wage of \$74,300, reflecting a diverse mix of public-sector, service-oriented, and professional industries. Employment in Brighton is heavily concentrated in Public Administration, Educational Services, Retail Trade, Health Care and Social Assistance, and Accommodation and Food Services.

Two of these five largest employment sectors in Brighton are also among the lowest wage industries: Accommodation and Food Services; and Retail Trade. These two sectors alone are estimated to comprise 23.1 percent of all wage and salary jobs in Brighton. Retail Trade employs 2,360 workers (12.9 percent) but offers lower average wages at \$44,900, while Accommodation and Food Services accounts for 1,863 jobs (10.2 percent) and has the lowest average annual wage at \$32,100.

Public Administration represents the single largest employment sector, accounting for 3,278 jobs (17.9 percent) with an average annual wage of \$84,700. Educational Services is similarly significant, comprising 2,963 jobs (16.2 percent) with relatively strong wages averaging \$94,200 annually. Service-oriented industries play a substantial role in the local economy. Health Care and Social Assistance employ 2,258 workers (12.4 percent) and provide moderately higher wages, averaging \$78,700 annually.

Professional and technical industries, while smaller in total employment, contribute higher-wage opportunities. Professional and Technical Services accounts for 738 jobs (4.0 percent) with an average wage of \$116,300, while Finance and Insurance and Information industries offer average wages of \$98,400 and \$96,400, respectively, despite representing relatively small shares of total employment. Management of Companies and Enterprises, though employing only 37 workers, exhibits the highest average wage at \$138,100.

Construction and Manufacturing together support over 1,500 jobs, providing average wages ranging from \$76,100 to \$84,100, reflecting stable middle-income employment opportunities. Smaller employment sectors such as Agriculture, Mining, Utilities, and Arts and Recreation collectively account for a minimal share of total jobs but include some higher-wage positions, particularly in Utilities and Mining.

Overall, the local employment base is anchored by public sector and education jobs, supported by a large service workforce and complemented by higher-wage professional and technical industries. This mix has important implications for housing demand across income levels, particularly the need for both workforce and lower-wage housing options within Brighton.



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