

**Boulder City Council
STUDY SESSION
Televised**

**Tuesday
September 17, 2015**

6-6:30 PM

**Continued Review of the 2016 City Manager's
Recommended Budget (tentative)**

6:30-7:30 PM

**Resilience Strategy
(material available Tuesday)**

7:30-9 PM

Mobile and Manufactured Homes

**Council Chambers
Municipal Building
1777 Broadway**

Submit Comments to City Council
Email: council@bouldercolorado.gov

or

Attention: Alisa Lewis, City Clerk
PO Box 791, Boulder, CO 80306
Fax: 303-441-4478



**Study Session
MEMORANDUM**

TO: Members of City Council

FROM: Jane S. Brautigam, City Manager
Tom Carr, City Attorney
David Driskell, Interim Housing Director
Jeff Yegian, Division of Housing Manager
Jay Sugnet, Senior Planner
Crystal Launder, Housing Planner

DATE: September 17, 2015

SUBJECT: Mobile and Manufactured Homes

EXECUTIVE SUMMARY

The purpose of this study session is to provide an overview of how mobile and manufactured homes currently help to meet the community’s housing needs and to get feedback from council on any actions the city should explore to preserve, protect and potentially expand mobile and manufactured homes as a housing option in Boulder.

Mobile homes have been recognized through city policy, programs and other activities for more than 30 years as an important housing option in Boulder. Mobile homes offer market-rate, relatively affordable homeownership that primarily serves low-income households. Some examples of these activities include establishing a Mobile Home (MH) zoning district to preserve existing mobile home parks, establishing a manufactured housing policy in the Boulder Valley Comprehensive Plan (BVCP), supporting permanent affordability of Mapleton Mobile Home Park, and funding the Mobile Home Rehab Program. As the city assesses its housing policies, including the role of mobile homes, and engages with park residents and owners on the challenges experienced with this housing model, there are many options for city action. Five areas for potential city action are highlighted in this memo:

- Preservation and expansion of manufactured housing
- Affordability to park residents
- Resident-owner relations
- Habitability and energy efficiency of manufactured housing
- Park infrastructure upgrades

Each category has a description of potential responses and a high-level initial analysis of their benefits, beneficiaries and scale of effort anticipated. In addition, staff identified a short list of action items that appear to be the best candidates for further analysis.

Staff requests feedback on the following questions:

1. Are the key issues and potential city actions the ones council believes are most important? Are there additional mobile home park or manufactured housing issues or actions staff should explore?
2. Which issues and possible city actions are priorities?

I. BACKGROUND

Since the mid 1980s, mobile homes¹ have been recognized as a component of Boulder’s affordable housing landscape that provides a market-rate, relatively affordable detached housing option in the community. This housing type can provide low-to-moderate income households, underserved by the homeownership market, with the opportunity to own a detached home with access to a private yard and the ability to build some equity. Mobile Home Parks (MHPs) also provide an affordable housing option for renter households and one of the only housing options both affordable and available to undocumented households that participate in Boulder’s workforce. These households cannot qualify for federally subsidized affordable rental housing due to requirements to provide proof of U.S. residency.

Concerned for the potential loss of this affordable market-rate housing option, Boulder became the first community in Colorado to develop a specific zoning district for MHPs in 1985. During the intervening 30 years, as described in **Attachment A – History of Mobile Home Parks and Policy in Boulder**, the city has taken a variety of actions, including the adoption of additional policies and programs to preserve MHPs, promoting resident-owned parks, mitigating natural

¹ Often the term “mobile home” is used when referring to housing in Mobile Home Parks (MHPs) and residents will often refer to their “trailer”; however the industry terms “mobile home” and “manufactured home” are both correct and apply to two different categories of home in MHPs. Homes built prior to June 15, 1976 are termed “mobile homes” and most, but not all, adhere to American National Standards Institute (ANSI) standards. Homes built after that date are termed “manufactured homes” and adhere to the federal department of Housing and Urban Development (HUD) standards for construction, design, performance and installation. A red label is affixed to these manufactured homes certifying they adhere to HUD standards. In this memo the terms are used interchangeably.

hazards, and supporting owners of manufactured homes. The 2000 major update to the Boulder Valley Comprehensive Plan included a new housing policy, which currently (2010 update) reads:

7.08 Preservation and Development of Manufactured Housing

Recognizing the importance of manufactured housing as an option for many households, the city and county will encourage the preservation of existing mobile home parks and the development of new manufactured home parks, including increasing opportunities for resident-owned parks. Whenever an existing mobile home park is found in a hazardous area, every reasonable effort will be made to reduce or eliminate the hazard, when feasible, or to help mitigate for the loss of housing through relocation of affected households.

Mobile Home Parks in Boulder and in Planning Area II

In Boulder, there are 1,191 mobile and manufactured homes in four MHPs (see **Attachment B – Maps of Mobile Home Parks in Boulder’s Service Area**) which comprise 2.7 percent of the city’s housing stock. Adjacent to Boulder in Area II are four additional MHPs with a total of 358 mobile homes. Area II is unincorporated Boulder County, but eligible for annexation. These MHPs were established between the late 1950s and 1970. All MHPs in the City of Boulder are zoned Mobile Home and all of the MHPs in Area II are zoned Manufactured Home by Boulder County. In three quarters of MHPs, the majority of homes were built prior to 1976 and therefore not subject to Housing and Urban Development (HUD) construction and safety standards. Only one MHP, Mapleton, has permanently affordable lots. It is owned by nonprofit Thistle Communities and leased and managed by resident-led Mapleton Home Association with the assistance of third-party property management services.

Table 1. Mobile Home Parks in Boulder and in Area II

	Year Park Established	Land Use*	Zoning	Total Lots	Mobile Homes	Occupied Lots	Pre-1976 Homes**	Permanently Affordable Lots
<i>Mobile Home Parks Located in Boulder</i>								
Boulder Meadows	1970	MH	MH	617	541	88%	31%	0
Mapleton	1961	MH	MH	135	133	99%	82%	120***
Orchard Grove	1963	MH	MH	217	214	99%	71%	0
Vista Village	1968	MH	MH	306	303	99%	35%	0
Total				1,275	1,191	93%		0
<i>Mobile Home Parks Located in Area II</i>								
Columbine	~1960	MH	MH	27	27	100%	89%	0
Ponderosa	1957	MH	MH	68	68	100%	78%	0
San Lazaro	1970	MH	MH	214	214	100%	58%	0
Table Mesa Village	1970	MH	MH	50	49	98%	67%	0
				359	358	100%		0

Source: Boulder County Assessor's Office, June 11, 2015

* MH land use = Manufactured Housing; City of Boulder zoning = Mobile Home, Boulder County zoning = Manufactured Home

**Mobile homes built prior to 1976 were not subject to HUD construction and safety standards.

***Maximum allowable incomes range from 30 to 60 percent Area Median Income and lot rents are affordable to these incomes.

Interests of the Community, Park Residents and Park Owners

The mobile home parks in Boulder provide value to the community as a whole, to park residents and to park owners.

Community Interest

Mobile home parks provide a reservoir of market-rate affordable housing and preserve community diversity across many categories, including race, ethnicity, age, national origin and family status. The dot map in **Attachment C** demonstrates the contribution of MHPs to racial and ethnic diversity in Boulder. MHPs also tend to foster strong neighborhoods and tight-knit communities and provide an economic and environmental service to the community by housing many service sector employees that might not otherwise afford to live in Boulder, reducing both commute times and greenhouse gas emissions. MHPs also provide an affordable option for older members of the community who wish to age in place.

Park Resident Interest

Lower income park residents have the opportunity to become homeowners of detached homes in a housing market otherwise out of reach. Park residents regularly report they enjoy not sharing walls with another household and having access to a small yard. In addition they gain some of the other benefits of homeownership, such as control over the physical home and the ability to build a certain level of asset. These interests are realized within the context of a “split tenure” situation; although the residents typically own their homes they rent the lots on which they are located. On the one hand, residents benefit from split tenure because it is the central factor limiting the appreciation on the mobile home, making it affordable. On the other hand, it includes monthly lot rent payments subject to increase, which decreases home appreciation, and results in a lack of long-term security. For many park households, mobile home ownership is an end in itself and for others it is a foothold in the homeownership market as they transition toward ownership of more expensive site-built housing.

Park Owner Interest

The primary interest of mobile home park owners is as a business. Therefore factors that increase income from their investment and reduce expenses are desirable. The value of a given MHP includes the income stream from lot rents, on-site services and fees and the appreciation of the park, which is a function of net park revenue. Due to the city and county’s zoning, redevelopment potential is not a key factor in MHP values. As MHPs age, the owners also face the cost of ongoing infrastructure and site maintenance, and at times costly upgrades to MHP water and sewer systems.

Legal and Regulatory Landscape

Colorado Mobile Home Park Act

This Act is a comprehensive state law regulating the relationship between park owners and home owners originally adopted in 1991. In 2010, city staff worked with the city's legislative delegation to strengthen the act.

State Prohibition on Rent Control

Colorado's statute banning rent control, C.R.S. § 38-12-301, instituted a statewide rent control ban to ensure that, notwithstanding home rule authority, no city or county in Colorado would, as a matter of law, be able to institute a rent control measure. To meet the requirements of the state statute, rent-controlled units must be owned in whole or in part by a housing authority or similar agency. In the case of Mapleton MHP, Thistle Communities, an affordable housing nonprofit and CHDO (Community Housing Development Organization), is a "similar agency" and is allowed to enforce rent restrictions on the 120 affordable lots. The city cannot, however, enforce rent control measures in the remaining three market-rate MHPs.

Zoning and Land Use

The City of Boulder's Mobile Home (MH) zone addresses zoning standards for mobile home parks, including setbacks and required spacing between mobile homes to preserve MHPs as a land use in the city. Boulder County also has a Manufactured Home (MH) zoning district. The manufactured housing land use underlies all eight parks in Boulder's service area and all eight are zoned MH as well.

Ordinance Limiting Park Owner's Right to Prohibit Sales

In July 2015, Council passed an amendment to the mobile homes chapter of the Boulder Revised Code limiting park owners' rights to prohibit the sales of manufactured homes and several other related items. This ordinance change was in response to complaints by residents of Vista Village Mobile Home Park limiting the sale of pre-1976 homes.

Additional Background Resources

Below are links to resources that provide additional background on issues related to mobile home parks and mobile and manufactured housing.

- [CFED March 2013 Manufactured Housing Metropolitan Opportunity Profile: Policy Snapshot, Denver, CO](#)
- [CFED March 2013 Manufactured Housing Metropolitan Opportunity Profile: Data Snapshot, Denver, CO](#)
- [Corporation for Enterprise Development \(CFED\) Manufactured Housing Toolkit](#)
- [Article in July 2015 issue of Land Lines, a publication of the Lincoln Institute for Land Policy, From Stigma to Housing Fix: The Evolution of Manufactured Homes.](#)

- [AARP Public Policy Institute 2004 report Manufactured Housing Community Tenants, Shifting the Balance of Power: A Model State Statute](#)

II. KEY ISSUES AND POTENTIAL RESPONSES

Based on the city's experience with mobile home parks, research on national practices and ideas proposed by community members, this memo identifies five focus areas and possible city actions for each.

1. Preservation and expansion of manufactured housing
2. Affordability to park residents
3. Resident-owner relations
4. Habitability and energy efficiency of manufactured housing
5. Park infrastructure upgrades

Attachment D provides a summary of potential responses, primary beneficiaries and level of effort for each response.

1. Preservation and Expansion of Manufactured Housing

Boulder Valley Comprehensive Plan policy 7.08 supports the preservation of existing mobile home parks, development of new MHPs and resident-owned parks. While the first objective has been substantially achieved through land use and zoning restrictions, the other two have not.

In 1988, a Mobile Home Task Force convened to determine the feasibility of creating a new MHP in Boulder. Although the task force found that it was financially and programmatically feasible to develop a new mobile home park, a suitable site could not be located. In addition to the MH zoning district, MHPs are allowed through Use Review in RL-2 (Residential Low – 2), RM-2 (Residential Medium – 2), RH-1 through 5 (Residential High – 1 through 5) and RMX-2 (Residential Mixed – 2) zones. However, 9-7-13, B.R.C., 1981 requires the minimum size of a park to be 10-acres (5 acres in the MH zone). The minimum size requirement combined with other factors make development of new MHPs both technically and financially impractical at this time. Changes to the current design standards for MHPs or identification of other pathways to development, such as a small lot subdivision, will likely be required to enable the development of a new MHP.

Although there have been efforts, to date no resident organizations have been able to purchase a MHP. For example, the city worked with the Mapleton Home Association (MHA), the resident organization for Mapleton Mobile Home Park, and Thistle Communities to facilitate an eventual transition to resident ownership of that MHP when it sold the park to Thistle in 2004.

Actions that could promote new parks and lead to resident ownership include:

<p>a. City financial and technical support of resident organizations and resident-owned communities (ROCs)</p>
<p>The city could provide financial support for resident capacity building, provide technical assistance and provide financial support for residents' to purchase their park. The primary benefits would be to provide park residents with greater stability, provide residents with the opportunity to gain capacity governing their parks and the units would be more likely to remain affordable in the long term. The older infrastructure in all parks, except Mapleton, will likely cost millions of dollars to upgrade and may make a park purchase by residents infeasible without significant subsidy. Mapleton MHP, however, is well-positioned to become a ROC given nearly a decade of resident leadership in the park with the support of third-party property management as well as upgraded infrastructure in the majority of the park.</p> <p>Nonprofit affordable housing providers, community land trusts, and housing authorities might also be considered appropriate community owners, ensuring the long-term viability of the communities and affordable rent structures.</p>
<p>b. Adjust existing land use, zoning and standards to enable establishment of new MHPs</p>
<p>The city could, as part of the 2015 BVCP update, determine if there are appropriate locations for new mobile home parks and pursue changes to land use and rezoning and/or consider changes to Table 7-2 Mobile Home Park Design Standards to enable the establishment of new MHPs. If new parks are established, Boulder would gain additional manufactured homes without many of the issues of older MHPs (e.g., old infrastructure, less energy efficient homes). However, changes to enable the establishment of new parks may not result in new parks without further city subsidy.</p>
<p>c. Define conditions of annexation that would encourage or facilitate MHP annexation</p>
<p>The city could define its requirements for park annexation (e.g., affordability) and the resources it would provide (e.g., waiver of fees, infrastructure replacement support) to create an economic incentive for parks in Area II to pursue annexation. Alternatively, the city could explore means of initiating annexation of parks. In either approach, the city would likely want park infrastructures to meet city standards. Annexation would bring parks under city jurisdiction and result in infrastructure upgrades if sufficient incentives were provided.</p>

2. Affordability to Park Residents

MHPs provide a detached housing option for low-to-moderate income households, which are underserved by the homeownership market. For example, the Orchard Grove Conservancy 2009 report found that three quarters of households in the park earned 50 percent or less of the Area Median Income (AMI). In Mapleton, the income restrictions on lots are similar to the economic distribution of households prior to the park being made permanently affordable. Just over half of Mapleton lots are permanently affordable to households earning no more than 30 percent AMI and 83 percent of lots are affordable to households earning no more than 50 percent AMI.

Three main factors contribute to the total housing costs of the home and therefore its affordability: 1) acquisition cost, 2) lot rent, and 3) ownership costs. The purchase prices of mobile homes, whether newly built and installed or pre-owned on-site, are substantially less than other market-rate homeownership options. A cursory internet search for mobile homes for sale or recently sold in Boulder found five homes in MHPs priced between \$29,900 and \$87,000. However, the financing options available to households purchasing in an MHP can add considerably to the acquisition cost. Mobile and manufactured home financing is more similar to automobile financing than real estate. These chattel or non-real estate or personal property loans are secured by the home itself, not the land and typically have higher interest rates and less favorable terms than conventional mortgages. A September 2014 Consumer Finance Protection Bureau report, [*Manufactured-housing consumer finance in the United States*](#), found that “about 68 percent of all manufactured-housing purchase loans (chattel as well as real property loans) reported under the Home Mortgage Disclosure Act in 2012 met the definition of a ‘higher-priced mortgage loan’ (HPML), a definition developed to identify a set of loans that might be considered subprime.” Comparatively, only three percent of site-built homes were HPMLs.

Lot rents, the second key factor in total housing cost, average in the low \$600 range in Boulder and continue to increase, particularly in an overall housing market in which prices are increasing and inventory is limited. Lot rent increases are also a concern in relation to needed investments in MHP infrastructure, in which MHP owners seek to recapture needed investment through increased income.

Lastly, lower income mobile home owners often struggle with the third housing cost item, ownership costs. On average nationally, mobile and manufactured homes have higher utility costs than site-built homes. As mobile homes age, lower income mobile home owners often defer maintenance due to a lack the resources to fund improvements.

Actions that could reduce acquisition costs, lot rents and ownership costs for mobile home park residents include:

<p>a. City purchase of existing mobile home parks, including establishing affordability requirements</p>
<p>The city could purchase existing mobile home parks from willing current park owners, modernize the infrastructure and place permanent affordability covenants on the lots. The city could then sell the MHPs either to the residents to establish the parks as ROCs or to an affordable housing partner. This would convert market-rate affordable housing to permanently affordable and give greater stability to residents. It would not increase the supply of permanently affordable housing in the community. Based on the 2010 financial analysis of Orchard Grove, staff estimates the per household subsidy to provide an affordable lot rent, but not restricted unit prices, would be equivalent to the subsidy required to provide an affordable apartment for rent.</p>
<p>b. Voluntary agreements with park owners to restrict lot rents</p>
<p>The city could invite park owners to enter a voluntary agreement for which the city would provide some kind of consideration, such as funding, in exchange for the right to restrict the rents on lots in MHPs. Park owners would maintain ownership. The consideration would need to be adequate to entice MHP owners to enter into a voluntary agreement. This would increase the stock of permanently affordable housing in the community and provide existing MHP residents with greater financial stability.</p>
<p>c. Study the prevalence and use of Section 8 in Boulder’s MHPs and determine city role in expanding the use of vouchers in MHPs</p>
<p>Staff could determine if there is a route for the city to facilitate the use of Section 8 vouchers in Boulder’s MHPs, which would provide a lot rent subsidy to the manufactured home renter. Currently, all Section 8 issuing agencies provide rental vouchers only, so unless those agencies reprogram some vouchers to homeownership, city efforts could only impact rented homes in MHPs. Potentially this could entail partnering with existing Metro-wide initiatives to increase the pool of Section 8 landlords with a focus on mobile home parks.</p>
<p>d. Financial assistance and financial counseling for home replacement and disposal of older model homes</p>
<p>The city could provide funding in the form of grants and/or loans with favorable terms and financial counseling to assist low-income MHP residents with home replacement and disposal of older homes. Newer homes are more energy efficient, which would benefit the individual with lower utility costs and the broader community with reduced energy consumption. Removal of existing homes is often a barrier to purchase of newer homes and this program could eliminate that issue. The expense is likely high, depending on program design and available outside funding sources.</p>

3. Resident-Park Owner Relations

The economic interests of MHP residents and market-rate park owners are largely at odds. Park owners are driven by running a profitable business and investing in the aspects of the park they believe will help the asset perform and build value. Lower income residents are more vulnerable to cost increases and some may not have the financial resources to maintain their homes and/or lots as prescribed by management. Additionally, some home owners are often reluctant to invest significant resources in home improvements with the constant risk of rent increases and other park owner actions that create a sense of housing instability. Recent events at Vista Village highlight this tension as did events at Orchard Grove in 2009 and in Boulder Meadows in 2001. Currently, the State of Colorado is the lead in managing MHP resident-owner relations. The Colorado Mobile Home Park Act regulates the relationship between park owners and home owners throughout the state.

In the past and more recently, park residents have sought assistance from the city with resident-owner relations. In 2001, the city established a one-time legal services fund of \$15,000 for Boulder Meadows residents reporting unfair management practices and in 2015 a second one-time legal services fund was established for Vista Village residents for similar reasons. The city recently passed Ordinance No. 8043 that provides increased protections for park residents, including disallowing park owners from restricting the sale of mobile homes built prior to 1976.

Additional actions that could support resident-park owner relations include:

a. Establish a permanent fund for mobile home resident legal services
The city could establish a permanent fund for mobile home resident legal services. Residents of MHPs are primarily low-income and may not be able to afford legal services. A permanent source of funding would allow residents as a group to secure legal advice as need arises and may encourage park owners to be more deliberative when taking actions that could impact residents. On the other hand, ongoing legal services for park residents may not be necessary and it may be more appropriate to continue to award legal service funding as need arises.
b. Develop a model lease between park owners and residents
The city could develop a model lease that park owners and residents would enter into voluntarily much like the city's model apartment lease. The existence of a model lease, regardless of prevalence of use, would provide a point of reference for equitable and reasonable terms for both owners and residents.
c. Pursue state legislation to change the Mobile Home Park Act (MHPA)
The city could pursue changes to the MHPA. Discussions with the National Manufactured Home Owners Association have identified the following candidates for policy changes: <ul style="list-style-type: none">• Enhanced enforcement mechanisms for the Act and associated funding sources.• Require a minimum one-year lease and encourage longer terms with rent

<p>increases prohibited during lease terms.</p> <ul style="list-style-type: none"> • Prohibit changes in park rules during term of lease. • Create an opportunity to purchase a mobile home park by residents or non-profit organizations. • Mandate mediation prior to any court action for eviction or other enforcement by the park owner. <p>Council interest in pursuing one or more of such policy changes should take into account the current make up of the General Assembly and the anticipated high level of difficulty of passing such legislation in 2016.</p>
<p>d. Mediation services specifically for park residents and park owners with conflicts</p>
<p>The city could provide expanded dispute resolution services specifically to support park residents and park owners. Mediation would provide a lower cost, lower stakes route to resolving MHP conflicts. The city’s Community Mediation Services already provides services for landlord-tenant disputes, typically between apartment landlords and tenants. This would not necessarily replace the need for legal services as both parties must be willing to participate.</p>
<p>e. Develop Rental Licensing for park operations</p>
<p>The city could, similar to apartment rental licensing, require licensing of MHPs in order for the park owner to lease lots in the park. MHPs in the city would be held to minimum standards for health and safety, fire protection and sanitary conditions of the park. This rental license would benefit park residents and the park owner by verifying that minimum standards were met. Unlicensed parks would face legal actions.</p>

4. Habitability and Energy Efficiency of Homes in Mobile Home Parks

In the eight mobile home parks in and adjacent to Boulder, 65 percent of mobile homes were built prior to 1976. Though older homes are not necessarily of poor quality, the components of many of these older homes are in need of replacement. Additionally, older mobile and manufactured homes tend to be less energy efficient than site-built homes, a factor which can result in high utility bills, undermining affordability.

The city provides funding to Longs Peak Energy Conservation to address health, safety and code repairs as well as provide energy efficiency upgrades. Longs Peak can assist up to fifteen mobile home owners annually with improvements valued at up to \$7,500. Of the 29 mobile homes Longs Peak assisted over the last two years, 20 were pre-1976 homes and all were more than 20 years old. The most common repair required was electrical, with 18 of the 29 homes (62 percent) requiring some level of electrical repair, two of which required major rewiring. Half of rehabbed homes required roof repair or replacement. Plumbing was the third most prevalent repair, with 13 homes requiring some level of plumbing work and four requiring major plumbing work. Other

prevalent repair categories were interior wall and ceiling repair, window replacement and gutter replacement.

Additional actions that could increase the habitability and energy efficiency of homes in the city’s mobile home parks include:

See 2d. Financial assistance and financial counseling for home replacement and disposal of older model homes	
a. Require city inspection as a condition of resale to ensure basic safety	
The city could provide city inspection of mobile and manufactured housing to ensure basic safety. The city currently has a program to inspect rental units; the process and basic standards would be similar. Income qualified home owners could potentially use the Mobile Home Repair Fund (see below) to pay for necessary upgrades.	
b. Expand eligibility and/or funding for rehab program currently administered by Longs Peak Energy Conservation	
The existing Mobile Home Repair Program serves up to 15 mobile home owners annually with up to \$7,500 in repairs. The city could provide additional funding and/or expand eligibility in order to reach more households. This program is popular and regularly hits its target for assisting households.	

6. Park Infrastructure Upgrades

Aging infrastructure presents a potentially significant health and safety issue facing mobile home parks around the country. Infrastructure replacement requires a very large investment into the park. The infrastructure in the MHPs in Boulder is private, though utilities connect to city services. Based on city records and with the exception of the portion of Mapleton MHP south of Goose Creek, all of the MHPs in Boulder have original infrastructure installed more than 40 years ago and are therefore at or past the replacement timeframe.

Table 2: Status of Infrastructure, Mobile Home Parks in Boulder, 2015

Park	Status
Boulder Meadows	Original park infrastructure; installed around 1970
Orchard Grove	Original park infrastructure; installed around 1963; 2009 Boulder Housing Partners (BHP) report for city found \$5.4 million would be required to bring park infrastructure up to city standards
Mapleton	Infrastructure south of Goose Creek installed 2008 (city and other funding); infrastructure north of Goose Creek original, installed around 1961
Vista Village	Original park infrastructure; installed around 1972

Actions that could encourage infrastructure maintenance and replacement in the city’s mobile home parks include:

a. Establish private utility standards and right to inspect as condition of city services
Private utility standards and the right to inspect would allow the city to verify the condition of the infrastructure in parks using city services, both inside the city and in Area II. This would protect the residents of the park from issues with the delivery of services and potentially head off infrastructure failure on the older infrastructure in most parks.
b. Establish a subsidy program to assist park owners to upgrade infrastructure
The city could establish a subsidy program to assist park owners with infrastructure upgrades. Permanent affordability could be required as a condition of participation. As noted above, a BHP 2009 study of Orchard Grove found that \$5.4 million would be required to update the infrastructure in that park, illustrating that infrastructure upgrades can be quite expensive.

Staff conducted a preliminary evaluation of the possible actions described above and in **Attachment D**. Based on anticipated ease of implementation and likelihood of successfully affecting progress, the following actions appear most promising.

- 3a. Create on-going legal services fund for MHP resident legal services.
- 3b. Develop model lease between park owners and residents.
- 3d. Expand mediation services for MHP residents and owners in conflict.
- 4a. Unit inspections required as a condition of all resales to ensure basic safety.
- 4b. Expand mobile home rehabilitation program eligibility and/or funding.

III. NEXT STEPS

Staff will use council input to inform the city’s 2016 work plan.

ATTACHMENTS

- A. History of Mobile Home Parks and Policy in Boulder
- B. Map 1: Mobile Home Parks in Boulder and in Area II
- C. Map 2: Cooper Center Race Dot Map and Mobile Home Parks in Boulder and in Area II
- D. Potential Responses for Mobile Homes and Mobile Home Parks

History of Mobile Home Parks and Policy in Boulder

INTRODUCTION

Mobile homes have long been recognized as a market-rate, relatively affordable housing option for Boulder residents. Beginning in the mid-1980s, city policies began to directly promote mobile home park preservation and development, balanced with the risk of natural hazards to parks. This is an overview of mobile home park policy in Boulder, capturing major milestones in the development of the city's policy and how on-the-ground conditions have led to different outcomes and approaches in different mobile home parks. Below is a summary of the city's policy decisions related to each of the mobile home parks located in Boulder.

1. Boulder Meadows – Legal defense fund established for residents, use of regulatory mechanisms (the Mobile Home zoning district) and no permanent affordability
2. Boulder Mobile Manor – Purchase by the housing authority, initial property management, and ultimate conversion to fixed foundation, affordable rental homes, to preserve long-term affordability
3. Branding Iron – City purchase, rezoned Public, park closed, and flood improvements provided along Goose Creek; four lots preserved with adjacent Mapleton Mobile Home Park
4. Mapleton Mobile Home Park – City purchase and subsidy provided to preserve permanent affordability of mobile homes; sold to affordable housing nonprofit Thistle Communities who leases to park resident organization Mapleton Home Association which manages park with assistance of third-party management company
5. “No Name” Park – Housing counseling and financial assistance provided to park residents, no rezoning to preserve mobile home use
6. Orchard Grove – Use of regulatory mechanisms (the Mobile Home zoning district) and no permanent affordability
7. Vista Village – Legal defense fund established for residents, use of regulatory mechanisms (the Mobile Home zoning district) and no permanent affordability

In the section following the chronology of policy initiatives, the 11 mobile home parks located in Boulder and in Area II are discussed in greater below. This chronology and history summary is not inclusive or a complete history of each mobile home park, but is based on previous research and history documents of the city.

CHRONOLOGY OF POLICY INITIATIVES

1984 Mobile Homes, Part of an Affordable Housing Strategy Mobile homes were first considered as part of an affordable housing strategy in 1984 when the Boulder County Consortium of Cities formed a countywide Mobile Home Task Force. This task force recommended:

- (a) Examination of zoning and building code regulations to eliminate barriers to manufactured housing; and

(b) Legislation by the Colorado General Assembly to protect the rights of owners of mobile homes.

1985 City of Boulder develops a Mobile Home (MH) Zone Concern that mobile home parks, considered a valuable part of the city's housing stock and located on medium to high density zoned land, would be redeveloped, Boulder became the first community in Colorado to develop a specific zone for mobile home parks. The Mobile Home (MH) zone addresses zoning standards for mobile home parks, including setbacks and required spacing between mobile homes and preserves the manufactured housing (MH) land use. Only parks owned by willing owners, Vista Village and Boulder Meadows, were rezoned at that time.

Today, all mobile home parks inside Boulder city limits – Boulder Meadows, Mapleton Mobile Home Park (MHP), Orchard Grove MHP, and Vista Village – are zoned MH and the four parks located adjacent to and near Boulder (Ponderosa MHP, Columbine MHP, San Lazaro Park Properties, Sans Souci MHP, and Table Mesa Village MHP) are zoned Manufactured Home (MH) by Boulder County. All of the parks in Boulder as well as those located adjacent to and near Boulder have been designated in the Boulder Valley Comprehensive Plan with a Manufactured Housing (MH) land use.

1988 Mobile Home Task Force The Mobile Home Task Force convened to determine the feasibility of creating a new mobile home park in Boulder. Although the task force findings determined that it was financially and programmatically feasible to develop a new mobile home park, a suitable site could not be located.

1999 Comprehensive Housing Strategy The 1999 Comprehensive Housing Strategy identified the purchase of mobile home parks as a priority tool.

2000 Manufactured Housing Policy in the Boulder Valley Comprehensive Plan The 2000 major update to the Boulder Valley Comprehensive Plan introduced the Manufactured Housing (MH) land use designation in Area I and II. The rationale for the new land use in Area I was that they provide needed affordable housing for the area and such land use would “signal the city's intent to preserve the affordable housing provided by the existing mobile home parks”, given the market pressures for them to redevelop. That same year, the land use for mobile home parks in Area II was similarly changed under the similar rationale, but also to create consistency with county land use and zoning maps, which had already zoned the parks MH.

In addition, a new housing policy titled *Preservation and Development of Manufactured Housing* was adopted. The rationale for this new policy was that it would “provide a policy basis for protecting and preserving a uniquely vulnerable type of existing low income housing or for assisting low income residents should their park be eliminated for reasons such as flood control mitigation”.

The 2010 version reads:

7.08 Preservation and Development of Manufactured Housing

Recognizing the importance of manufactured housing as an option for many households, the city and county will encourage the preservation of existing mobile home parks and the development of new manufactured home parks, including increasing opportunities for resident-owned parks. Whenever an existing mobile home park is found in a hazardous area, every reasonable effort will be made to

reduce or eliminate the hazard, when feasible, or to help mitigate for the loss of housing through relocation of affected households.

2015 Limiting Park Owner's Right to Prohibit Sales In July 2015, Council passed an amendment to the mobile homes chapter of the Boulder Revised Code, introducing a new section limiting park owners' rights to prohibit the sales of manufactured homes and several other related items. This ordinance change was in response to complaints by residents of Vista Village Mobile Home Park limiting the sale of pre-1976 homes.

Services and Funding for Mobile Home Owners

Over the years, the city has offered services and funding to support mobile home owners.

- In 1991, the city implemented the Mobile Home Grant Program, providing up to \$4,000 in assistance to mobile home owners for maintenance and repair. The city now (2015) grants funding to Longs Peak Energy Conservation to assist up to fifteen mobile home owners annually in the City of Boulder with up to \$7,500 in health, safety and code repairs as well as energy efficiency upgrades.
- In 1993, the city's Community Mediation Program expanded its guidelines to offer mediation services to mobile home communities in the Boulder Valley.
- In 1995, the city awarded an opportunity grant to residents of Columbine Mobile Home Park to explore purchase of their park. (The park was sold to a private entity.)
- In 1996, a VISTA/Americorps volunteer position was created to organize residents to develop resident councils. That same year, the city and county sponsored a conference, Mobilizing for a Change, focused on community organizing, resident ownership and legal issues. It led to a county-wide resident group.
- In 1998, the city also held a mobile home repair workshop for owners, established a homeownership program to assist homeowners to purchase mobile/manufactured housing, and published a mobile home landlord/tenant guide.
- In 2001, in response to complaints of unfair management practices at Boulder Meadows, the city established a \$15,000 one-time fund to pay an attorney to provide legal assistance to mobile home owners. In 2015, the city again established a one-time legal assistance fund of \$20,000, this time for Vista Village mobile home owners alleging park owners violated a number of provisions of the Mobile Home Park Act.

HISTORY OF INDIVIDUAL MOBILE HOME PARKS IN AND NEAR BOULDER

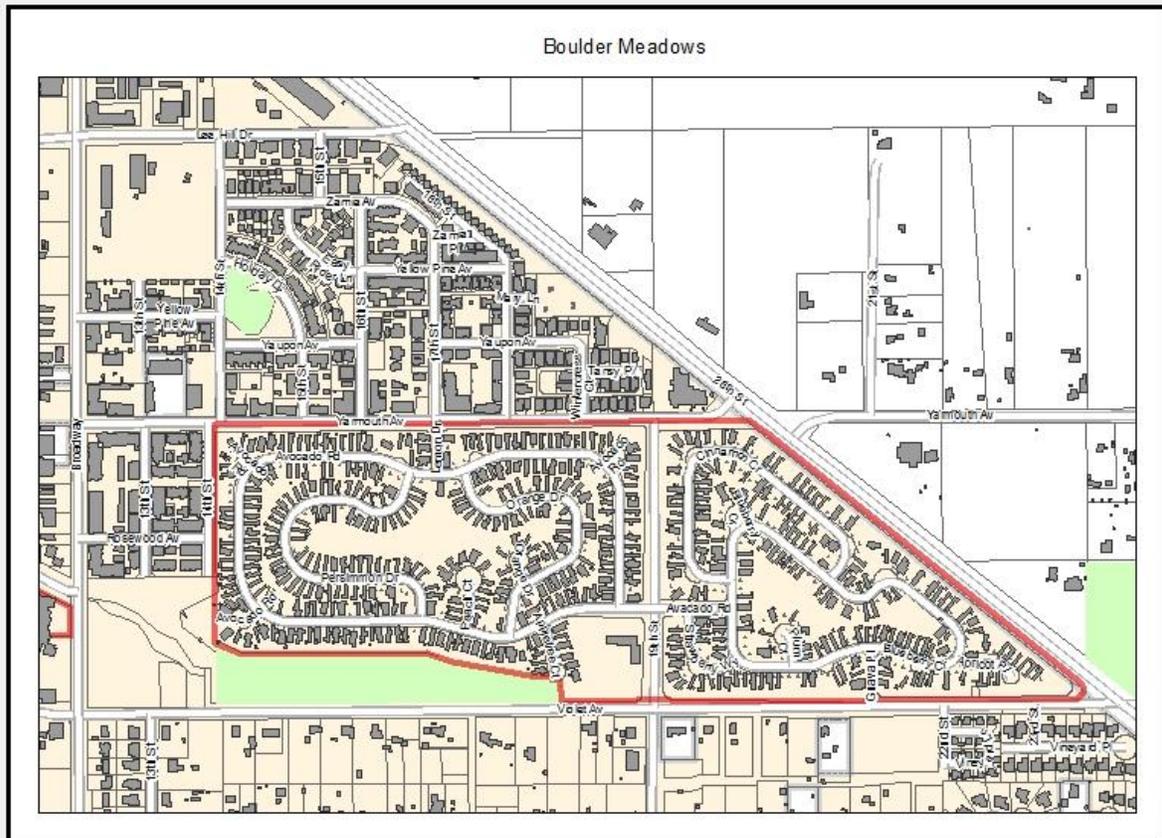
There are eight mobile home parks within the city limits or in BVCP Area II. They are:

1. Boulder Meadows
2. Columbine
3. Orchard Grove
4. Mapleton
5. Ponderosa
6. San Lazaro
7. Table Mesa Village
8. Vista Village

Since 2000, there are three mobile home parks that have closed. They are:

9. No Name
10. Boulder Mobile Manor
11. Branding Iron

1. Boulder Meadows (Countryside Village)



General

Year Established: 1970
 Total Lots/Pads: 617
 Vacant Lots: 76 (12%)

Manufactured Housing

Median Year Built: 1983
 Share Built Before 1976: 31%

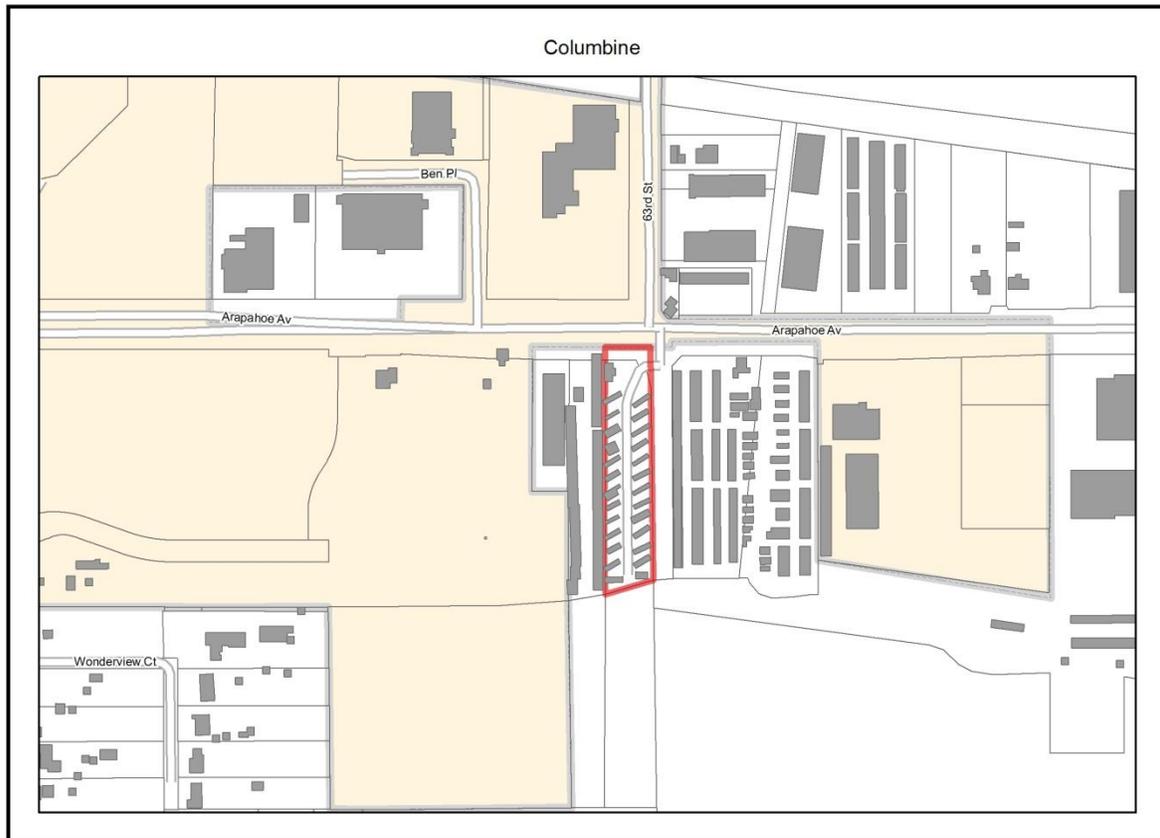
Estimated Utility Infrastructure Date

1970

Source: Boulder County Assessor’s Office, June 11, 2015

Boulder Meadows annexed into Boulder in 1990. Over the years, the city attended and at times facilitated meetings with residents and management focused on park practice around balancing affordability against park upgrades, and resident relations more generally. In 2001, as a result of numerous allegations of harassment and pretextual eviction, the city established a \$15,000 legal assistance fund for mobile home owners. In 2003, the city was asked to assume the water utility billing function for the homes in the park, which are separately metered with private water meters. A 2003 report on the topic found that it would be costly and coordination between park management and city staff would be significant and ongoing. The city declined the request.

2. Columbine



General

Year Established: approximately 1960

Total Lots/Pads: 27

Vacant Lots: 0 (0%)

Manufactured Housing

Median Year Built: 1967

Share Built Before 1976: 89%

Estimated Utility Infrastructure Date

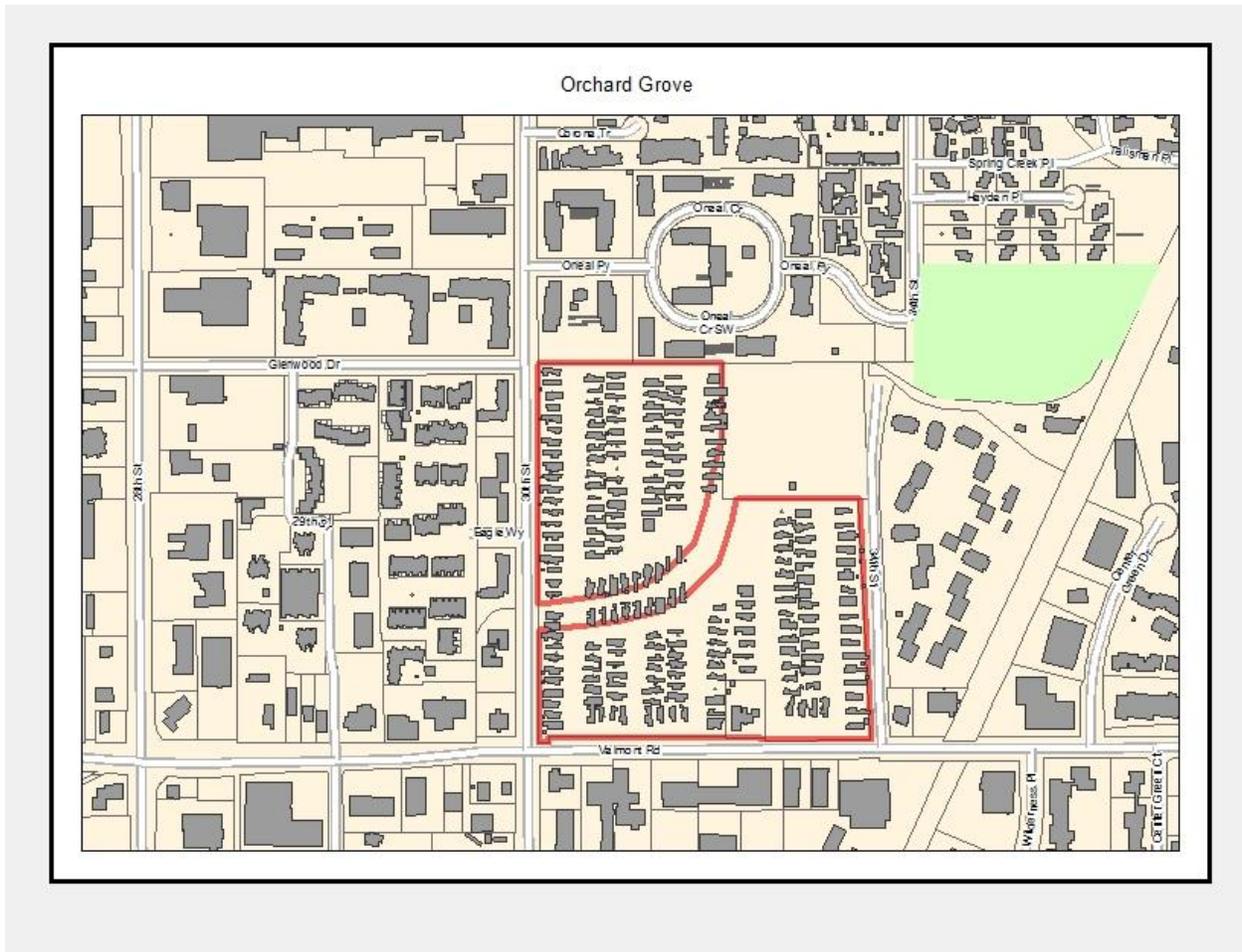
1960

Source: Boulder County Assessor's Office, June 11, 2015

Columbine is located outside the city limits, in BVCP Area II, and is eligible for annexation. The property is served by city water and sewer through an out-of-city utility permit issued in 1964.

In 1995, the city awarded the park an opportunity grant to explore resident purchase of the park; however the park was ultimately sold to a private owner.

3. Orchard Grove Mobile Home Park



General

Year Established: 1963

Total Lots/Pads: 217

Vacant Lots: 3 (1%)

Manufactured Housing

Median Year Built: 1971

Share Built Before 1976: 71%

Estimated Utility Infrastructure Date

1963

Source: Boulder County Assessor’s Office, June 11, 2015

The Orchard Grove Mobile Home Park (MHP) was established in 1963 and privately owned by a longtime Boulder partnership that had maintained below-market mobile home pad rents. Unlike Vista Village and Boulder Meadows, Orchard Grove was not rezoned Mobile Home when the MH zone was introduced in 1985, but remained medium-density residential. In 2008, Orchard Grove was put on the market and a perspective buyer proposed converting the park into higher density fixed foundation housing. Residents approached council with concerns about potential loss of homes, community and lifestyle. They prepared a report detailing options to become a resident-owned park. In response to concerns about losing Orchard Grove and the benefits it provided to the community, including affordable housing, in July 2008, at the request of the residents, City Council rezoned the park to Mobile Home.

In late 2009, the city contracted with Boulder Housing Partners to study the park, and draft a report on the physical and environmental attributes, an infrastructure rehabilitation plan, and development of financial strategies. Report findings, were the park offered for sale, a viable purchase would require either:

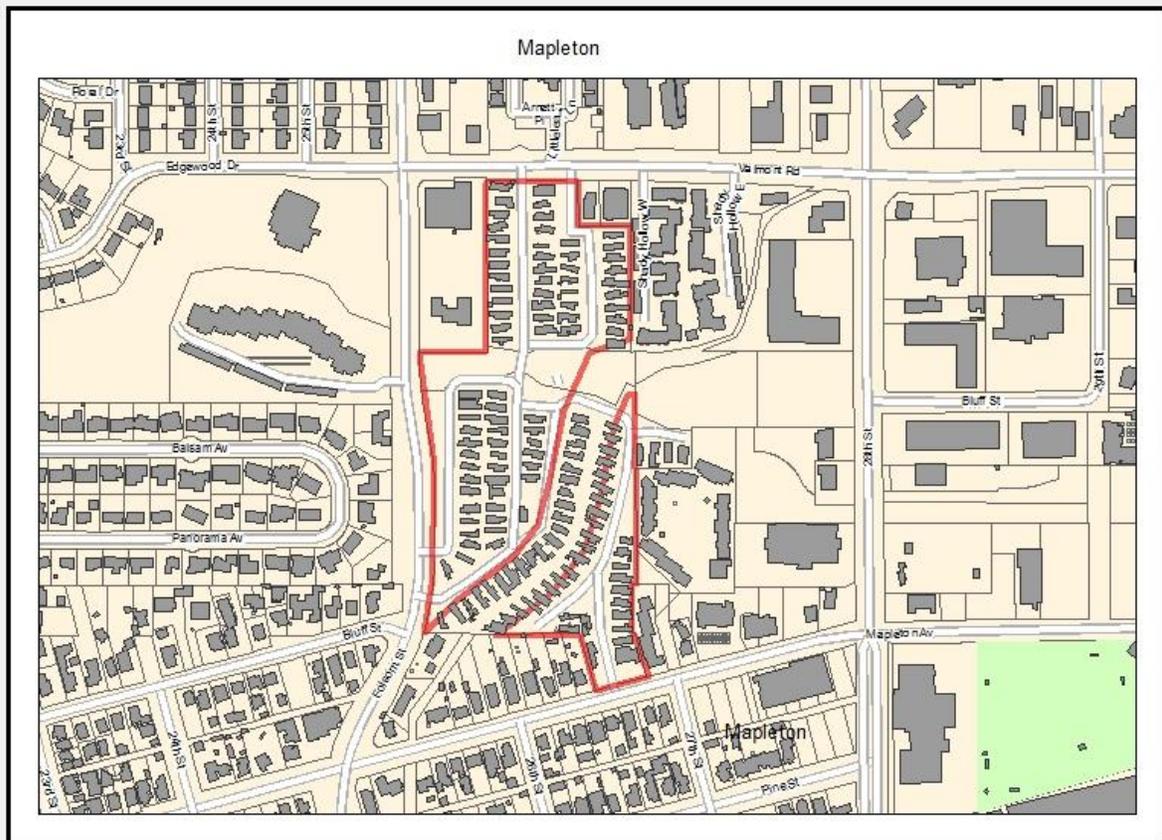
- Subdivision of much of the property, then rezoning and sale of the frontage along Valmont and 30th St for mixed-use redevelopment, or
- Estimated \$6.3 million in subsidy funding.

In either scenario, an additional \$5.4 million in subsidy would be required to bring the park infrastructure up to city standards.

A 5-acre parcel in the northwest corner of the park was not rezoned to Mobile Home, and in the 2010 Boulder Valley Comprehensive Plan update it was determined to leave the land use designation medium-density residential, for future development.

Since that time, the park owner implemented lot rent increases and ultimately sold the park to the private entity Riverstone Communities in 2015.

4. Mapleton Mobile Home Park



General

Year Established: 1961

Total Lots/Pads: 135

Vacant Lots: 3 (2%)

Permanently Affordable Lots: 120

Manufactured Housing

Median Year Built: 1967

Share Built Before 1976: 82%

Estimated Utility Infrastructure Date

South of Goose Creek installed in 2008; north of
Goose Creek 1960s

Source: Boulder County Assessor's Office, June 11, 2015

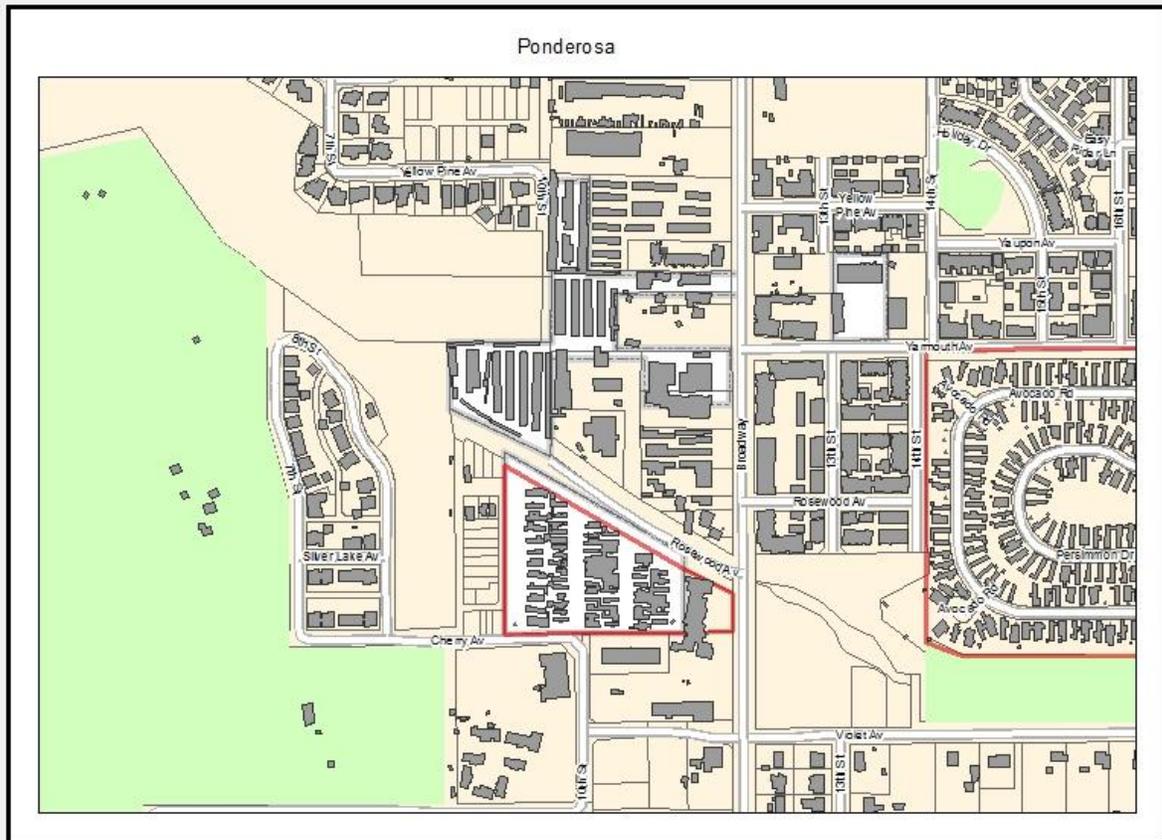
In Boulder, Mapleton Mobile Home Park is the only park purchased and later subsidized by the city. It was ultimately conveyed to affordable housing nonprofit Thistle Communities to preserve under covenant. It was purchased by the city for \$3.5 million in 1996, using the Stormwater and Flood Control Utility Fund. Residents continued to own and live in their homes. The intent was to facilitate planned flood improvements to Goose Creek and to preserve Mapleton as a resident-owned, affordable mobile home park. Issues encountered in the effort to establish a resident-owned park included: financing the purchase, financing infrastructure improvements, management of the park.

The city and Mapleton Home Association (MHA), the resident-led entity that would come to manage the park, approached Thistle Communities to purchase the park. Thistle purchased the park in 2004 for \$2.96 million (with \$550,000 city subsidy funds). The city retained a portion of the park along Goose Creek and completed flood mitigation work.

The MHA leases the park from Thistle and contracts with a third party property management company, to oversee it, including setting park rules, park maintenance and rent increases. Of the park's 135 occupied lots, 120 are permanently affordable to households with incomes at or below 30 percent to 60 percent AMI.

In 2007, the city provided an additional \$884K in subsidy funds for basic improvements to the entire park. Thistle and the MHA decided to complete enhanced improvements. Infrastructure improvements have only been completed for the portion of the park south of Goose Creek with a total wet and dry infrastructure costs estimated to be \$4.7 million or \$53,225 per space for 88 spaces. Total cash subsidy funds from city to Mapleton to date equals \$1.23M or approximately \$9,300 per space. Thistle also invested over \$700,000 into Mapleton and brought in other funds from the Colorado Division of Housing and Federal Home Loan Bank.

5. Ponderosa



General

Year Established: 1957
 Total Lots/Pads: 67
 Vacant Lots: 0 (0%)

Manufactured Housing

Median Year Built: 1969
 Share Built Before 1976: 78%

Estimated Utility Infrastructure Date

Varies, 1950s to current.

Source: Boulder County Assessor’s Office, June 11, 2015

The Ponderosa Mobile Home Park appears to have begun operation sometime in the early 1950s. Some documents list the park opening in 1957. A 1958 aerial photograph shows the park with 16 units. By 1966 the park had expanded to 54 units, and by 1972 expanded to 68 units, which is the size the park remains today. The park operated on a well and septic system until the late 1970s, when water supply issues began resulting in the park running out of water, and potential contamination issues arose. In coordination with the County Health Department, the park applied for and received an out-of-city utility permit for city water and sewer service.

The city issued the water connection permit in 1980. Based on the as-built drawings, it appears the city water connection was tied into the existing park water line infrastructure. Connection to the city sewer system occurred in 1984, and was also tied into the existing park sewer line infrastructure.

ATTACHMENT A - History of Mobile Home Parks and Policy in Boulder

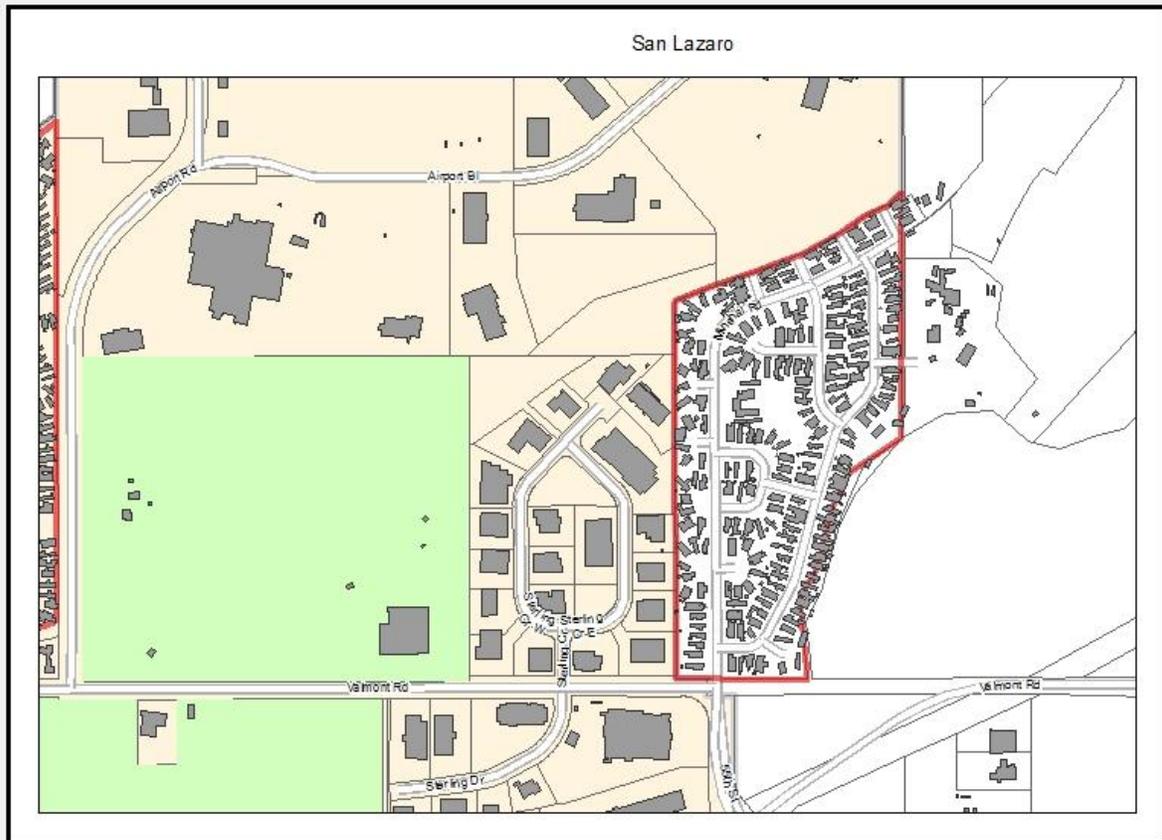
In 1990 the city began studying the park due to concerns of life safety and infrastructure, and in 1991 and 1992 Thistle Communities, then Thistle Community Housing, and the city worked to examine the feasibility of purchasing and operating the park. In 1992 the city, residents, and the property owner began discussing the annexation of the park, upgrades to the utilities, and the sale of the property to the city for the purpose of eventual transfer to the residents as a resident-owned community. In May 1994, the city formally offered to purchase the park, plus the vacant two-acre parcel to the west for \$944,000. City staff, at the direction of the City Council, proceeded to identify the necessary phased upgrades to the park, including reconstruction of the utilities, paving the streets, and replacing unsafe units, utilizing the vacant two-acre parcel to resolve spacing issues with existing units. The total cost for infrastructure upgrades was estimated at just over \$1,000,000 in 1996. The city proposed a phased purchase package for the owner to spread the city's purchase payments over several years, and a loan to transition to a resident-owned community. In April 1996, the owner informed the city that he was not interested in responding to the city's purchase offer, which the city then formally withdrew.

In 1997, the county rezoned the park to Manufactured Housing Park zoning. In 2000, the city and county changed the land use designation from Medium Density Residential to Manufactured Housing in the Boulder Valley Comprehensive Plan.

In 2000, the owner began the process of exploring annexation again, this time without any city purchase considerations. The city reviewed and provided numerous comments and questions for additional analysis to the owner. In 2002 the application for annexation was withdrawn.

In 2004, the then owner (since 1971) sold the park (without the adjacent vacant two-acre parcel) to the current property owner. The adjacent parcel was then sold to a separate buyer and annexed and developed as the 1000 Rosewood project. In 2010, a group of students from the University of Colorado Boulder College of Architecture and Planning prepared a survey and report on the neighborhood. Since that time, the current owner has performed some small upgrades to the park. In early 2013, the owners applied for a pre-application review to upgrade the existing water lines inside the park. Due to the provisions in the out-of-city utility agreement, annexation was necessary before any work could be completed. In September 2013, flooding occurred throughout the city and county, including Fourmile Canyon Creek, causing shallow surface water flooding throughout the park, and causing significant damage to surrounding properties and much of north Boulder.

6. San Lazaro



General

Year Established: 1970

Total Lots/Pads: 214

Vacant Lots: 0 (0%)

Manufactured Housing

Median Year Built: 1972

Share Built Before 1976: 58%

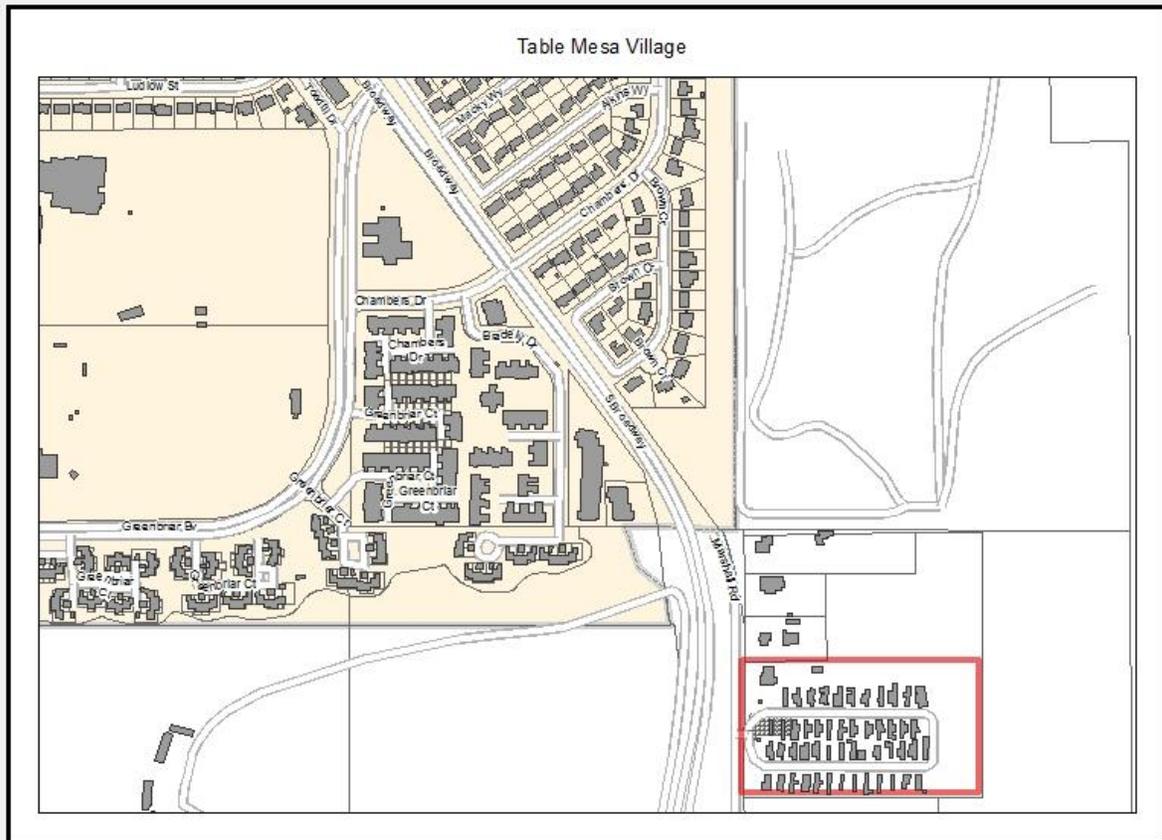
Estimated Utility Infrastructure Date

1969

Source: Boulder County Assessor's Office, June 11, 2015

San Lazaro is located outside the city limits, in BVCP Area II, and is eligible for annexation. The property is served with a “back-up” city water service through an out-of-city utility permit. The primary water source is a well. The property has an on-site wastewater treatment facility that discharges into Boulder Creek.

7. Table Mesa Village



General

Year Established: 1970
 Total Lots/Pads: 50
 Vacant Lots: 1 (2%)

Manufactured Housing

Median Year Built: 1971
 Share Built Before 1976: 67%

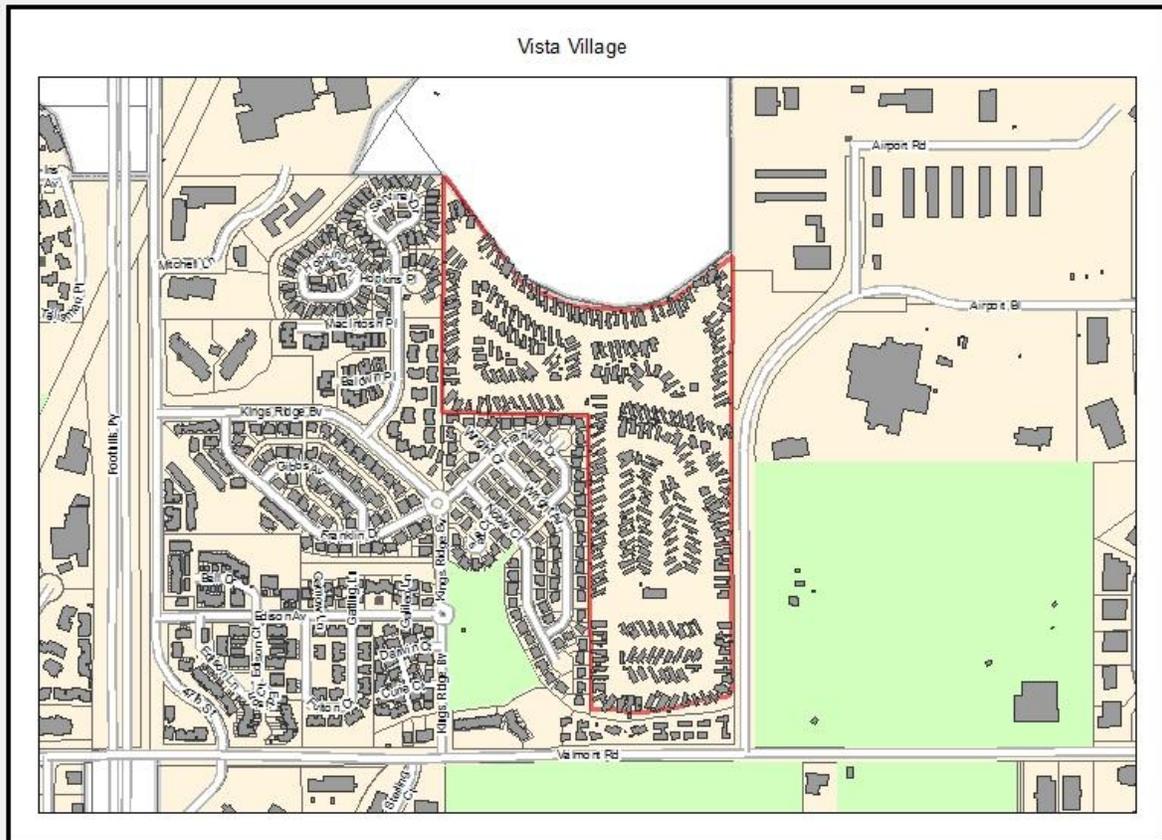
Estimated Utility Infrastructure Date

Late 60s

Source: Boulder County Assessor's Office, June 11, 2015

Table Mesa Village is located outside the city limits, in BVCP Area II, and is not eligible for annexation due to a lack of contiguity to the existing city limits. The property is served with city sewer through an out-of-city utility permit. The primary water source is a well.

8. Vista Village



General

Year Established: 1968

Year Annexed: 1978

Total Lots/Pads: 306

Vacant Lots: 3 (<1%)

Source: Boulder County Assessor's Office, June 11, 2015

Manufactured Housing

Median Year Built: 1979

Share Built Before 1976: 35%

Estimated Utility Infrastructure Date

1972

Vista Village was annexed into the city in 1978. It was one of the two mobile home parks rezoned MH in 1985 when the mobile home zone was established in Boulder. In 1984, the city's Human Relations Commission brought suit against the owners of Vista Village to allow children in the park (Vista Village Mobile Home Community v. Boulder Human Relations Commission, Civil Action No. 84-CV-0658-5). In 1985, apparently in response, the state added language to the Mobile Home Park Landlord-Tenant Act that the state legislature intended to "fully occupy the field of mobile home landlord-tenant relations".

In early 2015, City Council learned that residents of Vista Village Mobile Home Park were being denied the right to sell early model homes. Numerous residents gave public testimony about this situation and alleging retaliatory attacks by the owner. In 2015, an ordinance passed allowing mobile homeowners the right to resell their safe and decent homes without prohibition by park owners along with other protections.

9. No Name Park

Year Park Established: 1960s or 70s

Year Annexed: 1992

Year Park Redeveloped: 2012

New Development: 98 market-rate apartments.

This park may have also been known as Alpine MHP or North Boulder MHP. This property annexed into Boulder in 1992. Because of the small, informal nature of the park, rezoning to the MH designation was never pursued. In 1994, the owner attempted to evict all residents in order to redevelop the park. The city collaborated with Emergency Family Assistance Association (EFAA) to provide financial assistance and housing counseling to residents. The redevelopment plan was not approved and redevelopment halted. In 2012, the park was closed. The developer bought out the residents of the park and this and an adjacent parcel became the site of the privately owned 98-unit Violet Crossing rental property.

10. Boulder Mobile Manor (Red Oak Park)

Year Park Established: 1961

Year Purchased by Housing Authority: 1997

Year Park Redeveloped: 2011

New Development: 59 permanently affordable single-family, duplex and triplex rentals

In 1985, the city attempted to purchase Boulder Mobile Manor but was unable to secure financing.

Boulder Mobile Manor, a 66-unit mobile home park was purchased by Boulder Housing Partners (BHP), the City's housing authority, in 1997. The original intent was to operate it as an affordable rental property and phase in a homeownership program. Some homes in the park were small and some manufactured as early as 1958. By 1997, homes in the park were deteriorating and infrastructure failing. Between 1997 and 2007, the park received total of \$751,000 (\$11,000 per unit) in city funds for acquisition of property, repairs and maintenance.

In 2007, the city identified redevelopment of Boulder Mobile Manor as a high-level initiative from the perspective of social, environmental and economic sustainability, and a city inter-departmental staff team to work with BHP on a strategy to redevelop Boulder Mobile Manor. Guiding principles were established that included preserving affordability, minimizing displacement of current residents, replacing mobile homes with fixed-foundation housing, establishing a mixed income community over time, preserving community and natural features, and maintaining rental housing.

Redevelopment of the park as Red Oak Park, a 59-unit permanently affordable, fixed foundation rental property, was completed in 2011. Former park households that chose to remain in the new Red Oak Park, stated they were generally happy with the change.

11. Branding Iron Mobile Home Park

Year Park Established: 1961

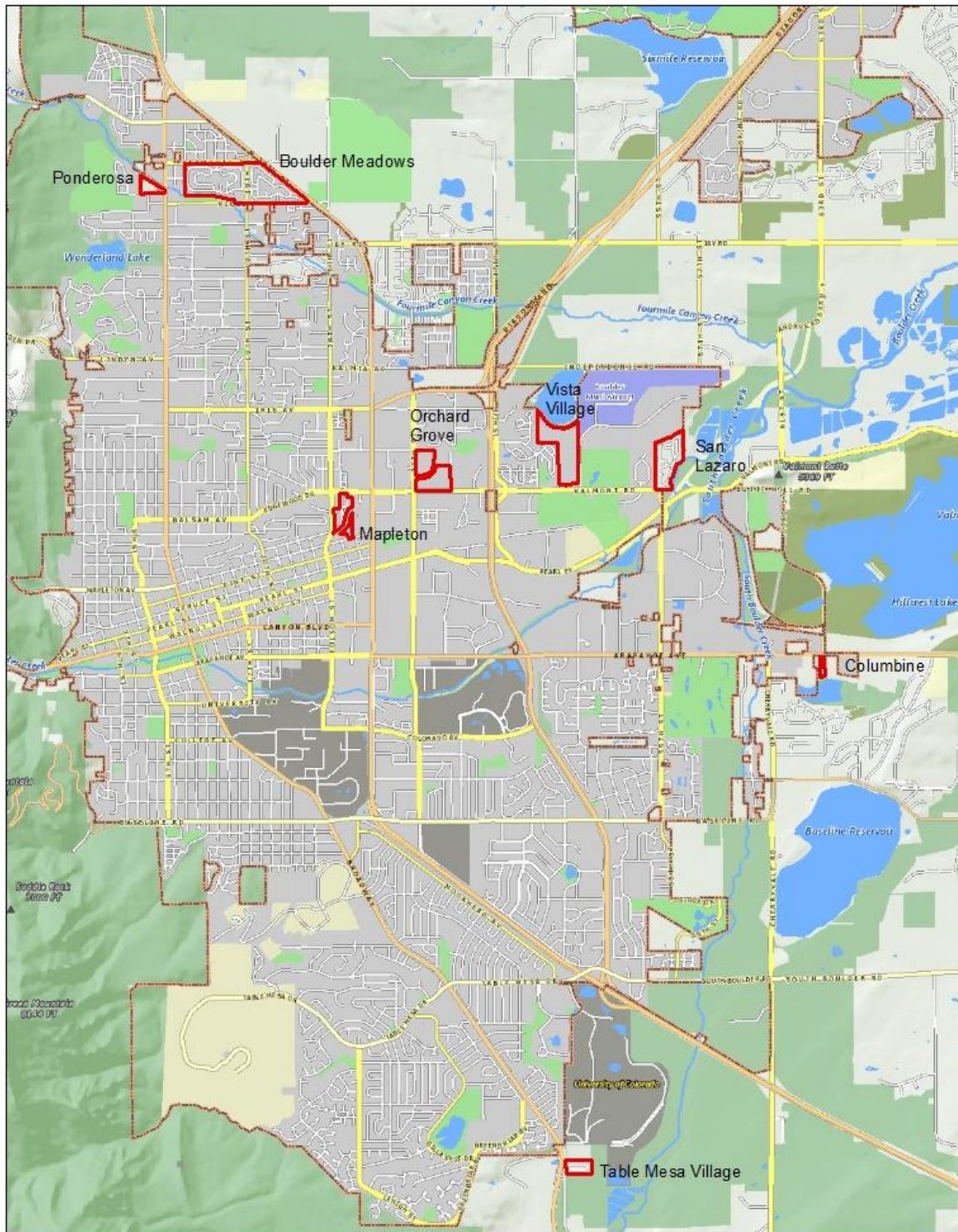
Year Purchased by City: 1992

Year Park Redeveloped: late-1990s (flood control)

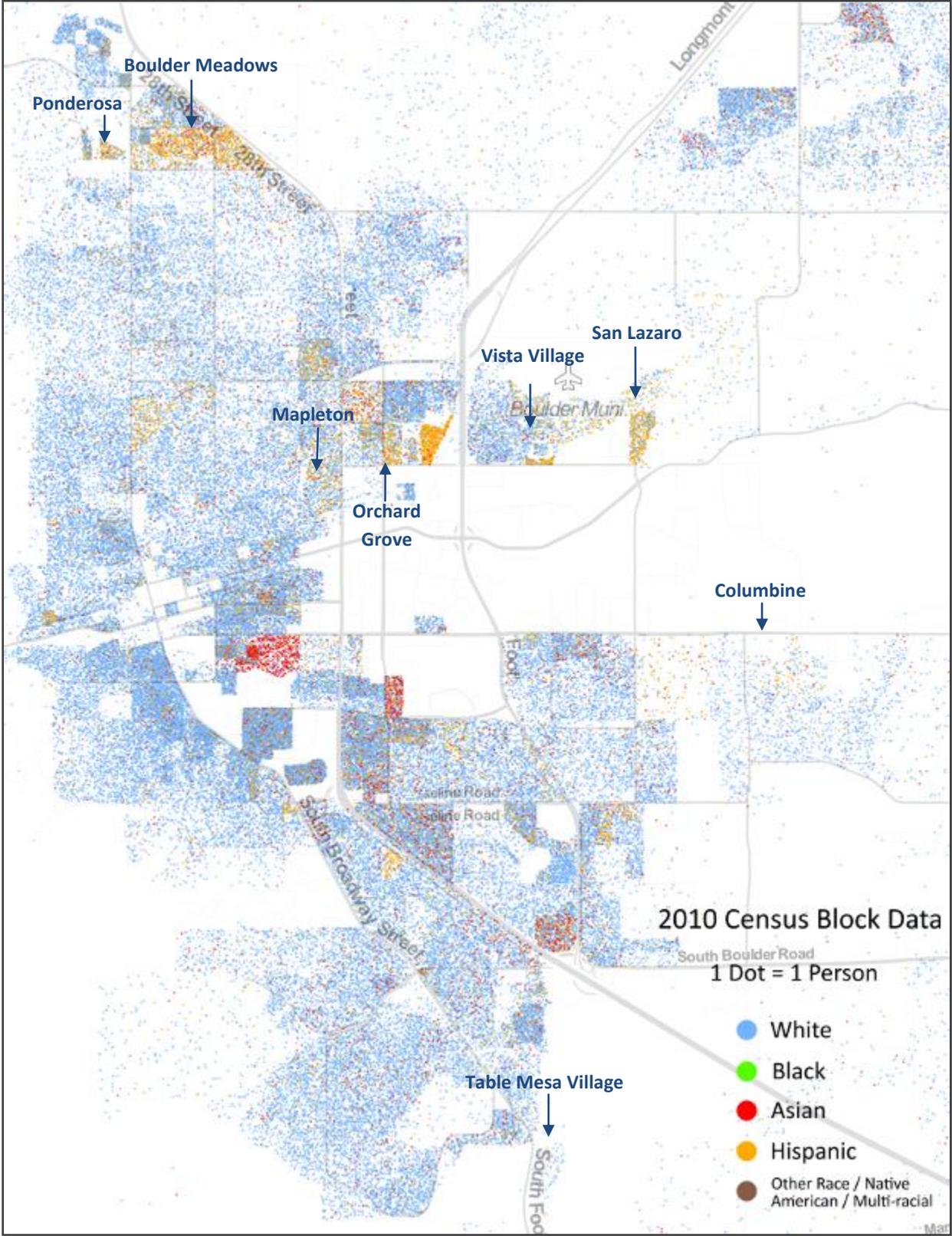
New Development: Goose Creek flood control channel improvements; Four lots combined with Mapleton Mobile Home park to the west.

In 1992, more than half of Branding Iron Mobile Home Park, a 36-unit mobile home park, was rezoned from Mobile Home to Public in order to use the property for Goose Creek flood control channel improvements. As a result of long negotiations with the park owner, in 1992, the portion of Branding Iron Mobile Home Park, more than half of the park, was rezoned Public and purchased by the City of Boulder for Goose Creek flood control improvements using the Flood Control Utility Fund. Four of the existing mobile homes on the site remained, and were again rezoned MH in 2003, and incorporated into adjacent Mapleton Mobile Home Park. The city assisted the balance of park residents with relocation to open lots in the Mapleton Mobile Home Park or elsewhere.

Map 1: Mobile Home Parks in Boulder and in Area II



Map 2: Cooper Center Race Dot Map and Mobile Home Parks in Boulder and in Area II



Source: <http://demographics.coopercenter.org/DotMap/> accessed August 26, 2015

ATTACHMENT D - Potential Responses for Mobile Homes and Mobile Home Parks

Potential Responses for Mobile Homes and Mobile Home Parks (MHPs)	Outcomes										Primary Beneficiaries	Level of Effort
	Permanent Affordability	Enable New MHPs	Greater Affordability for MHP Residents	Support Park Resident-Park Owner Relations	Increased Resident Stability	Resident Capacity Building	Energy Efficiency	Health & Safety in MHPs	Increase Housing Options	General Park Upgrades		
1a. Pursue Resident Owned Communities (ROCs).			✓	✓	✓	✓					Park Residents Community*	Staff Time Public Process FUNDING
1b. Foster New Parks by adjusting land use, zoning and standards.		✓							✓		Community	STAFF TIME PUBLIC PROCESS
1c. Define Annexation Conditions to encourage or facilitate MHP annexation.					✓			✓			Park Residents Park Owners Community	STAFF TIME PUBLIC PROCESS
2a. Purchase Existing MHPs and make permanently affordable.	✓		✓		✓						Park Residents Community	Staff Time Public Process FUNDING
2b. Explore Voluntary Agreements with park owners to restrict lot rents.	✓		✓		✓						Park Residents Park Owners Community	STAFF TIME Public Process FUNDING
2c. Section 8 Vouchers. Seek expanded use of vouchers in MHPs.		✓	✓						✓		Park Residents Community	Staff Time Public Process
2d. Support Home Replacement with financial assistance and counseling.				✓	✓		✓	✓		✓	Park Residents Park Owners	Staff Time Public Process Funding
3a. Create On-going Legal Services fund for MHP resident legal services. ★				✓	✓						Park Residents	Staff Time Public Process Funding
3b. Develop Model Lease between park owners and residents. ★				✓	✓						Park Residents Park Owners Community	Staff Time Public Process

★ = promising city action based on ease of implementation and likelihood of short-term success

* Note: Community is defined here as the community at large, with benefits to the community considered to be increased alignment with community goals identified in the BVCP.

ATTACHMENT D - Potential Responses for Mobile Homes and Mobile Home Parks

	Outcomes										Primary Beneficiaries	Level of Effort
	Permanent Affordability	Enable New MHPs	Greater Affordability for MHP Residents	Support Park Resident-Park Owner Relations	Increased Resident Stability	Resident Capacity Building	Energy Efficiency	Health & Safety in MHPs	Increase Housing Options	General Park Upgrades		
Potential Responses for Mobile Home Parks (MHPs)												Small Medium LARGE
3c. Pursue State Legislative Change to the Mobile Home Park Act (MHPA).				✓	✓						Park Residents Community	STAFF TIME Public Process
3d. Expand Mediation Services for MHP residents and owners in conflict. ★				✓	✓						Park Residents Park Owners	Staff Time Public Process
3e. Develop Rental Licensing for park operations.				✓				✓		✓	Park Residents Park Owners Community	Staff Time Public Process Funding
4a. Unit Inspections. Require city inspection as a condition of all resales to ensure basic safety. ★				✓				✓			Park Residents Park Owners	Staff Time Public Process Funding
4b. Expand Mobile Home Rehabilitation Program eligibility and/or funding. ★			✓					✓	✓		Park Residents	Staff Time Funding
5a. Establish Private Utility Standards as condition of city services.								✓		✓	Park Residents	STAFF TIME PUBLIC PROCESS
5b. Create Subsidy Program to assist park owners to upgrade infrastructure.								✓		✓	Park Residents Park Owners	Staff Time Public Process FUNDING