STUDY SESSION MEMORANDUM

TO: Members of City Council

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DATE: May 27, 2014

SUBJECT: Comprehensive Housing Strategy

EXECUTIVE SUMMARY

The purpose of the study session is to request council feedback on the following:

1. Foundations work (housing market analysis and research on why people make certain housing choices);
2. Initial draft project vision and goals;
3. Suggested "early wins" (i.e., policies and tools to pursue in the short term while longer term strategies are further developed and evaluated during the coming year).
4. Inventory of "housing opportunity sites" for further analysis.

The Comprehensive Housing Strategy (CHS) is a next generation housing policy framework, combined with an implementation toolkit, that will focus on:

1. Strengthening the city's affordable housing programs for low- and moderate-income households;
2. Expanding housing opportunities for middle-income households; and
3. Exploring innovative approaches to providing additional housing and a broader range of housing options, particularly for housing needs not being met by the market.

The strategy will set forth a creative mix of policies, tools and resources to make progress on multiple fronts, in a manner consistent with the Boulder community's priorities, values and overarching sustainability framework. It will help inform and guide Council decisions on which policies and tools to pursue in the short, medium, and long term within the context of the broader housing strategy. The CHS is envisioned as a "living document" that will guide ongoing work related to housing policies and programs. In other words, adoption of the strategy will not signal the end of the city's housing-focused discussions, but rather inform annual work program priorities aimed at continual monitoring, evaluation and action to strengthen and expand housing opportunities through a variety of tools and coordinated strategic initiatives.

Questions for Council:

1. Does Council have questions or feedback related to the foundations work (housing market analysis and research on why people make certain housing choices);
2. Does Council have feedback on the draft project vision and goals?
3. Does Council have feedback on the "early wins" and opportunity sites?

MEMO ORGANIZATION

I. Background
II. Board and Commission Feedback
III. Public Feedback
IV. Work to Date
V. Summary of Housing Market and Choice Analysis
VI. Draft project vision and goals
VII. Draft List of Potential Policies and Tools
VIII. Early Wins
IX. Opportunity Sites
X. Next Steps

I. BACKGROUND

Housing is the basic building block of high quality neighborhoods and a diverse community fabric of experiences, backgrounds and socio-economic levels. While progress has been made since the 1999 Comprehensive Housing Strategy, conditions have changed and a new strategy, built upon the current one, is needed to address current and future challenges. The new Comprehensive Housing Strategy is intended to expand and preserve diverse, affordable housing choices in Boulder. The Strategy will take a broad look at housing from the perspectives of land use policies, city investments, affordable housing programs, and market-rate housing production with a focus on the following key issues:

- The shrinking of Boulder's economic middle (households earning $65-150K annually) and how to create policies, programs and tools to reverse this trend;
- The tale of two Boulder housing types: detached single-family homes are increasingly only affordable to the wealthy in Boulder, while attached homes, such as condos and apartments, provide better affordability for middle-income households (however, are less attractive to families);
- The growing 59% of Boulder workers who live in surrounding communities, including city employees, CU faculty, police and fire professionals, school teachers, and service workers;
- Shifting demographics and changes in housing preferences (e.g., millennials, seniors, single-person households); and
- The challenge of limited land supply and how to redevelop existing areas in ways that respond to the community's evolving housing needs in a manner consistent with other community values and priorities.

To the greatest extent possible, the Comprehensive Housing Strategy is being coordinated and integrated with the following strategic planning initiatives to ensure complementary and logical outcomes that advance Boulder's established sustainability initiatives, climate commitment and resilience:

- Transportation Master Plan;
- Economic Sustainability Strategy;
- Envision East Arapahoe;
- North Boulder Subcommunity Plan Update;
- Access Management and Parking Strategy;
- RTD's Northwest Area Mobility Study; and
- 100 Resilient Cities Initiative.

In particular, it is anticipated that the Comprehensive Housing Strategy and other 2014 planning initiatives will inform key areas of focus in the 2015 update of the Boulder Valley Comprehensive Plan.

II. BOARD AND COMMISSION FEEDBACK

CHS was discussed at Planning Board on May 15. Feedback from the Board will be summarized at the May 27 Council Study Session.

III. PUBLIC FEEDBACK

Over 60 people attended the Open House on May 12th to weigh in on the Comprehensive Housing Strategy, the Access Management and Parking Strategy and the Zero Waste Strategic Plan. Attendees had the opportunity to share concerns and questions with city staff and to make statements with sticky notes on the boards around the room where the meeting was held. About 60 sticky notes related to the CHS were posted. Major themes that emerged where:

- Polarized sentiment on the issue of raising occupancy limits, though some residents took a moderate stance, supporting targeted increases of occupancy limits (e.g. increasing occupancy for seniors or cooperatives only);
- Support for strategies to retain middle-income households;
- Support for strategies that enable seniors to age in place;
- Polarized sentiments on growth and density increases (e.g., annexation, height limit increases) with some citizens taking a moderate stance, supporting density, but concerned about ensuring that city services increase proportional to growth;
- A desire to include more tools focused on rental housing.

In addition, Inspire Boulder has an ongoing online conversation to generate interest and feedback on the strategy. http://www.inspireboulder.com/topics/14866/boulder-s-comprehensive-housing-strategy

Staff is also meeting with key stakeholders early in the project to ensure coordination and ongoing participation in developing the strategy. Specifically, staff is coordinating weekly with Boulder Housing Partners and has met with the Boulder Valley School District, Boulder County Aging Advisory Council, University of Colorado, PLAN Boulder, and the Boulder Area Realtors Association. Continued public engagement, including broad community outreach and continued stakeholder participation is planned, as outlined later in this memo.

IV. WORK TO DATE

Providing affordable and diverse housing options is a long-standing community concern and a key policy priority articulated in the Boulder Valley Comprehensive Plan. Limited supply of undeveloped land, very low rental vacancies, a vibrant economy, and a high quality of life have caused rents and home prices to rise faster in the city than other parts of the region.[1] As Council discussed in study sessions last year, Boulder is recognized for its success in creating permanently affordable housing for low- and moderate-incomes and the market is meeting demand for higher incomes; but middle-income households are increasingly choosing to purchase detached single family homes in other communities due to lower costs for comparable properties.

In 1999, Boulder completed a Comprehensive Housing Strategy (CHS). The key outcomes of that effort included:

- Adoption of the Inclusionary Housing ordinance that requires 20 percent of all new housing to be permanently affordable to low- and moderate-income households;

[1] Housing Market Analysis, BBC, 2013.

- Amended city annexation policies to position affordable housing as the highest priority community benefit;
- Focused on the 2000 Major Update to the Boulder Valley Comprehensive Plan to identify opportunities to expand the amount of housing and housing choices in the community; and
- Partnered with the University of Colorado to increase the supply of off-campus housing for students close to the university.

In 2000 and 2010, the Boulder Valley Comprehensive Plan updates as well as planning efforts such as the Transit Village Area Plan identified opportunities to expand the amount and choice of housing in the community (e.g. designation of sites for mixed use development, 28th Street frontage road, Boulder Junction). The 2010 update also affirmed the city's commitment to supporting the following goals:

- Local Support for Community Housing Needs;
- Preserve Housing Choices;
- Advance and Sustain Diversity; and
- Integrate Growth and Community Housing Goals.

In 2010, the Affordable Housing Task Force was formed to consider potential improvements to the city's affordable housing goals and programs. The task force resulted in a report and recommendations in eight areas. Many of the innovative policies and tools identified by that effort will be included in this planning effort.

In 2013, Council recognized that the city's housing challenges require more than minor adjustments to current programs. City Council held study sessions on February 13 and May 14 in 2013 to understand the current housing challenges and provide direction on the development of a strategy. In May 2013, Council reviewed a Housing Market Analysis and provided feedback on a proposed project purpose statement, key assumptions, and guiding principles. **Attachment A** lists the revised purpose statement, key assumptions and guiding principles based on that feedback.

Plans for further analysis, including a community survey and focus groups, were postponed in fall 2013 due to the flood emergency, with the project work recommencing in early 2014. That work was completed in late April and includes a more refined analysis to understand who lives, works and studies in Boulder, what types of housing products are offered in the market, and why individuals make certain housing choices. A survey was deployed in early 2014 and received over 3,000 responses. In addition, focus groups with seniors, in-commuters, and residents, including two with Spanish and Nepali speakers, were conducted to provide additional insight into housing choices and to reach a broader segment of the community. The Housing Choice Survey and Analysis is summarized below and available online.

In early 2014, Council requested data on population, jobs, and housing over the past decade. Staff updated the 2014 Community Profile which shows ten-year trends in

population, jobs, and housing. In addition, a 2014 Affordable Housing Development Trends profile was completed specific to affordable housing, see **Attachment B**. It shows progress towards the city's 10 percent affordable housing unit goal, the total number of permanently affordable units produced by source, and the amount of cash-in-lieu funding the city has received over the past thirteen years.

V. SUMMARY OF HOUSING MARKET AND CHOICE ANALYSES

Below are the key findings of the foundations work and in particular the recently completed Housing Choice Survey and Analysis. A total of 1,643 residents, 1,405 in-commuters and 457 students responded to the online survey. Although the survey was self selecting and not random, the large number of responses and respondents' demographic similarity to Boulder residents overall suggests that the survey results are representative of Boulder's population.

1. Before the 1990s, Boulder housing was moderately priced—the median price of an owned home in 1990 was just $122,700. Home values were comparable to the rest of the county and region. Between 1990 and 2005, home prices increased rapidly, rising by 273%, much faster than the county. By 2010, median home value was $344,000 in the county while the city exceeded $500,000.

2. The strongest increases in home prices occurred between 2000 and 2005, when Boulder saw an 11% compound *annual* increase in the median priced home. Although the rate of increase slowed considerably after 2005, prices remained high and it became increasingly hard to find an affordable home to buy in Boulder. In 2000, 497 units, or 26% of all units were listed at less than $200,000 and 1,015 or 52% were listed for less than $300,000. By 2012, this had dropped to 281 or 13% for less than $200,000 (approximately one sixth of these were deed restricted) and 541 or 26% for less than $300,000. These units are nearly all attached.

3. The premium the market placed on housing in Boulder has made it increasingly difficult for low and middle-income workers to buy and rent in the city. Because of early policies to maintain an affordable inventory in the city, many low and moderate-income workers have been able to make Boulder their home. Many of these workers have made significant trade-offs, such as living in a smaller home, buying an attached home and/or taking on additional mortgage debt.

4. Some workers, such as teachers and nurses, bought homes in Boulder before wealth and equity became a necessity for homeownership in Boulder. If price increases continue, when they retire, younger teachers and nurses that replace them will not be able to live in most single-family neighborhoods unless they rent.

   This is already occurring for non-student, minority workers in the service industries in Boulder. Hispanic and Nepalese residents who participated in focus groups currently rent and work numerous jobs to afford to live in Boulder. Most aspire to home ownership, but feel they will need to leave Boulder to buy a home.

5. Overall, in-commuters are similar to Boulder residents in terms of age profiles, racial and ethnic diversity and even income levels. They are more likely to have children, own a single family home and be commute-tolerant than Boulder workers. In-commuters are not lower income than Boulder residents—overall, they have slightly higher incomes. This suggests that for many households housing choice is associated more with product size, type and amenities than affordability (price is a factor, but the primary consideration is a house of certain size and character).
6. Many in-commuters would like to live in Boulder and consider making "trade-offs" to live in the city. Of middle-income commuters, 53% would consider moving to Boulder in the future. They would mostly be willing to live in an older home in decent condition (84%) or a smaller single family detached home (75%). Half of in-commuters would be willing to live in a townhome to live in Boulder; one-third would live in a duplex/triplex/fourplex. They are much less willing to live on a busy street or in a condominium to live in Boulder.
7. Given Boulder's land constraints, the in-commuters Boulder is most likely to capture are those willing to live in higher density attached product (townhome/duplex/ triplex/fourplex). These in-commuters are similar demographically to all in-commuters and are more likely to be renters. The lure of homeownership and a Boulder lifestyle is likely to be very compelling to this segment of the in-commuter market, as well as living near open space and having a short commute.
8. One-fourth of all seniors said they plan to leave Boulder after retirement and 43% said they would consider leaving Boulder to find housing to meet their needs. The average senior has $480,000 in home equity and prefers to remain in the city. Yet they worry about the lack of senior-friendly housing in the city and may move to find the housing type (e.g., patio homes, senior only communities) they need.
9. Persons with disabilities identified lack of affordability as a barrier to staying in Boulder, not lack of accessibility.

VI. DRAFT PROJECT VISION AND GOALS

A Vision for Housing in Boulder

The Boulder Valley Comprehensive Plan sets forth a vision for Boulder's physical development, guided by a commitment to comprehensive, integrated social, economic and environmental sustainability. Importantly, the form and shape of the city's physical development helps create and sustain the city's social fabric, supports livelihoods, and helps reduce and mitigate the environmental impacts of human activity.

Housing is the largest single land use in the city, and arguably the most critical building block of the city's neighborhoods and overall quality of life. It also represents one of the largest costs for Boulder households, and for many, their largest lifetime investment. Housing is personal, financial, and emotional.

Envisioning Boulder's housing future must therefore encompass a holistic view. While analyses of "numbers of units," "household incomes," "product types" and "market demand" (among many other factors) are essential to ensuring a successful strategy, these quantitative approaches must be guided by a values-based vision that's about creating community, sustaining diversity, protecting the environment and supporting human development.

The Boulder Valley Comprehensive Plan sets forth a number of important policies that help define the community's vision and values for housing and residential neighborhoods. While the following summary is not comprehensive, it helps to highlight some of the core elements of the current vision that Boulder has for its housing future:

- Meet the housing needs of low and moderate income households;
- Increase the proportion of permanently affordable housing units to at least 10% of the existing housing stock;
- Encourage development for housing for populations with special needs;
- Strengthen partnerships and regional cooperation;
- Provide and maintain a mixture of housing types;
- Preserve and rehabilitate existing housing stock;
- Encourage housing for current and future households;
- Balance housing supply with employment base;
- Integrate permanently affordable units throughout community; and
- Minimize displacement of low-income populations during redevelopment.

Draft Project Goals

The following draft goals are intended to inspire and direct work on the Comprehensive Housing Strategy. The goals, once refined and adopted, will be used to guide the strategy development process and evaluate potential policies and tools. The goals should not be viewed individually, but rather as a comprehensive and coordinated approach toward achieving the overarching purpose of the project -- to preserve and expand diverse, affordable housing choices in Boulder in a manner consistent with the community's social, economic and environmental sustainability principles.

For each goal, examples of how the goal might be advanced are provided in order to illustrate the types of policies or initiatives that might be considered. These examples are illustrative only, and are not comprehensive. The work of the coming months will involve consideration of specific strategies and tools in each area, engaging the community and stakeholders in determining what the priority areas for action should be in advancing each goal.

1. Strengthen Our Current Commitments

Reach or exceed Boulder's goals to serve very low, low and moderate income households, including people with disabilities, special needs, and the homeless.

Examples of how the CHS could advance this goal include:

- Establish a target date to achieve the current 10% goal of permanently affordable units
- Reach the 10% goal by a certain target date
- Establish clear funding priorities

2. Maintain the Middle

Prevent further loss of Boulder's economic middle by providing greater variety of housing choices for middle-income families and for Boulder's workforce.

Examples of how the CHS could advance this goal include:

- Explore options to preserve the affordability of existing housing
- Facilitate the creation of relatively affordable attached townhomes and other higher density but family-supportive housing types through land use and zoning changes
- Identify opportunities for the city to support greater use of location-efficient mortgages to increase purchasing power
- Create a middle-income downpayment assistance or low interest financing program

3. Create Diverse Housing Choices in Every Neighborhood

Facilitate the creation of a variety of housing options in every part of the city, including existing single-family neighborhoods.

Examples of how the CHS could advance this goal include:

- Make it easier and more financially feasible to develop accessory dwelling units and owner accessory units (e.g., granny flats and carriage houses)
- Make it possible for groups of unrelated individuals (e.g., seniors, co-ops) to share housing (above current occupancy limits)
- Make it possible to create duplex units, small townhome developments and other appropriately scaled multi-unit housing in existing single-family neighborhoods
- Establish minimum density standards or alternative approaches to managing density to avoid creating new areas that offer only large, high priced single family homes.

4. Create 15-minute Neighborhoods

Foster the development of mixed-income, mixed-use neighborhoods in amenity rich locations (i.e., close to transit, open space and trails, employment centers, etc.).

Examples of how the CHS could advance this goal include:

- Identify opportunity sites for housing at densities appropriate to the context and with a variety of types and styles to meet Boulder's future housing needs

- Partner with nonprofit housing developers to create mixed income, mixed use developments on key opportunity sites
- Explore new zoning tools to incentivize or require desired unit mixes, types or sizes, such as "benefit capture" provisions connected to property rezoning
- Establish a pattern book of desired housing outcomes, particularly for family-friendly higher density housing and for housing that meets special needs, linked to streamlined review processes

5. Strengthen Partnerships

Strengthen current partnerships and explore creative new public-private-partnerships to address our community's housing challenges (e.g., University of Colorado, private developers, financing entities, affordable housing providers, etc.)

Examples of how the CHS could advance this goal include:

- Work with CU to facilitate housing development in key locations (e.g. North of Boulder Creek, Williams Village, South Campus)
- Create a project development and facilitation role within the city

6. Enable Aging in Place

Provide housing options for seniors of all abilities and incomes to remain in our community, with access to services and established support systems.

Examples of how the CHS could advance this goal include:

- Work with partners to meet the needs of seniors (appropriate housing choices and range of options)
- Work with partners to meet the needs of low and very low income seniors
- Work with partners to meet the needs of people with disabilities and others with special needs

VII. DRAFT LIST OF POTENTIAL POLICES AND TOOLS

The CHS is envisioned as a both a strategic framework and implementation toolkit that will guide the city's planning and action initiatives over the coming years. To start the process of determining an appropriate set of tools for the CHS, staff has compiled a list of potential policies and tools for consideration and evaluation over the coming months. This list will become the Implementation Toolkit.

Many of the tools were proposed in the 1999 Comprehensive Housing Strategy, but many additional tools were identified by the 2010 Affordable Housing Task Force and other stakeholders over the past several years. Staff will continue to add to the list and evaluate the tools against the project goals over the summer and fall. It is envisioned that an initial

evaluation effort – guided by community, stakeholder, board and council input – will help to shape a shorter list of tools, with subsequent evaluation being in more depth to help determine which tools should be the priority focus for the CHS. The list is for reference, see **Attachment C**, and not a focus on the Council Study Session.

VIII. EARLY WINS

A central tenet of the CHS initiative is to embrace the need for ongoing attention and action related to Boulder's affordable housing challenges. To that end, Council requested that staff identify and propose some "early wins" that could help improve conditions even as more significant policy work is undertaken in the coming months and year.

Evaluation criteria used to identify potential early wins included:

1) Meets one or more of the three project focus area subjects:
   a) strengthening the city's affordable housing programs for low- and moderate-income households;
   b) expanding housing opportunities for middle-income households;
   c) exploring innovative approaches to providing additional housing and a broader range of housing options;
2) Generally consistent with existing polices or existing conditions (i.e., it helps improve application of existing policies, rather than represent a significant departure);
3) Can be accommodated in the existing work plan with existing resources (i.e., the scope is fairly narrow, and can be kept so, so that the "win" can be achieved in the near-term); and
4) The specifics of the issue are largely known (i.e., does not require extensive research or data analysis).

Following is a summary of the potential early wins identified to date, including a brief description, required resources to accomplish it, estimates on timing, pros and cons, and any known issues. Currently, staff is preparing potential code amendments related to open space and parking and does not have capacity to address all of the following immediately. ***Therefore, it is recommended to sequence early wins over the next year in the following order.***

A.) Right-of-way (ROW) and density calculation ordinance

What is it? In areas of the city subject to adopted area plans or transportation network plans, the city has identified new public streets and connections needed to realize more gridded, interconnected neighborhoods where present conditions are more large lot and suburban. These connections are typically obtained through redevelopment of sites through the Site Review process. Under current land use code restrictions, the number of dwelling units allowed is calculated after ROW dedications are subtracted from the land area of sites, which reduces the number of overall units. This scenario in some cases significantly reduces the number of units to the extent that redevelopment becomes less feasible due to multiple dedications, and creates situations in which two community

benefits (desired new housing units, and improved connectivity) are placed in competition with each other. The modification will allow calculation of the gross site area prior to dedication in determining the maximum number of units that might be achieved through the Site Review process. Importantly, the Site Review criteria and other regulatory controls that ensure context sensitive outcomes would remain in place (e.g., setbacks, height controls, BVCP land use densities, etc.). This code change would, however, remove an impediment to achieving housing densities in areas of redevelopment.
Where applied? Areas where there are adopted area and transportation network plans.
Required resources? Accomplished within existing city resources.
Estimates on timing: Planning Board recommended approval on May 1; Council consideration is scheduled for June.
Issues: None identified, although Planning Board expressed a desire to also look at how open space requirements are used to control housing density as part of a future code update effort. This issue has also been identified by staff previously, but is seen as a more substantial work effort.

B.) Council call-up of Concept Review applications

What is it? At the 2014 retreat, City Council indicated a desire to help shape key projects early in the process. This would allow City Council to weigh in early on Concept Reviews (after Planning Board review and comment) as a method to inform the design and configuration of large scale, complicated proposals and help property owners gain a higher level of confidence in determining whether their proposals are consistent with city goals and policies. The land use code could be revised to require all Concept Plans to be subject to City Council call up.
Where applied? In the near term, specific projects could include 2100 30th St., the car dealership between Pearl and Walnut, where a Concept Plan has been submitted proposing re-zoning from BR-1 to MU-4 to provide a greater number of residential units; and the Hogan Pancost property near the East Boulder Community Center, for which the owner is expected to submit a new Concept Plan in the coming months.
Required resources? Accomplished within existing city resources.
Estimates on timing: Council consideration in Summer 2014.
Issues: Would potentially increase Council and staff work load and number of applications for City Council to consider, with additional memorandums and presentations to City Council for those proposals that are actually called up.

C.) Senior housing in single family neighborhoods

What is it? The number of seniors is expected to double between now and 2028 to approximately 30,000. In partial response to this trend, senior advocates have identified a need for a housing model that allows multiple, unrelated seniors to share a single family home in a single family neighborhood. The idea is for four to six older adults to share a large house, companionship, and living costs. A concierge service would provide many basic needs, but one model includes a live-in caregiver as one of the four to six residents.
Where applied? To be determined.

Required resources? May require additional city resources.
Estimates on timing: Council consideration in Fall 2014.
Issues: Although a process exists currently to raise the occupancy limits for group home facilities, this type of use requires custodial care and treatment in a protective living environment to the handicapped or aged person (60 years or older). Options to allow seniors to share a single-family home include exempting seniors from occupancy limits or creating conditional use criteria specifically for this situation. Additional legal and policy analysis is required to ensure compliance with state and federal fair housing laws.

D.) 1-to-1 unit replacement ordinance for 100% permanently affordable

What is it? Many affordable housing developments in Boulder were built prior to existing zoning districts. As a result, these developments have more residential dwelling units than the current zoning districts allow. There are an estimated 21 affected projects that are unable to rebuild to the number of units currently existing on the site. In order to retain the total number of units in these developments, nonprofit organizations have been incrementally rehabbing these properties, with funding assistance from the city's Division of Housing in the form of CDBG, HOME and Affordable Housing funds. The incremental approach is often more expensive than demolishing the existing buildings and developing new projects. Boulder Housing Partners owns the majority of affected properties, but Thistle and Boulder Housing Coalition also have properties.
Where applied? The ordinance would apply only to existing affordable properties that are nonconforming.
Required resources? Accomplished within existing city resources.
Estimates on timing: Council consideration in Fall 2014.
Issues: None identified.

E.) Targeted fix to ADU/OAU

What is it? The intent of the Accessory Dwelling Unit (ADU)/Owner's Accessory Unit (OAU) ordinance was to enable the cost-effective and efficient use of existing single family homes in Boulder. In particular it was hoped that ADU's would offer supplemental income and possibly services to older residents and to single parent households, allowing them to stay in their homes. The resulting units are small, inherently more affordable due to size, and provide additional housing choice and opportunity within existing single family neighborhoods, though typically only attractive or available to one or two person households.
Where applied? To be determined.
Required resources? Depending on the scale of the project, may require additional city resources.
Estimates on timing: Council consideration in Winter 2014-2015.
Issues: ADUs and OAUs have a long and complicated history in Boulder that will be documented as part of developing the strategy. The existing ordinance has numerous restrictions on the construction of ADUs. An early win would involve repealing one or more of the current restrictions to encourage this housing type. Of the existing barriers, three that could be accomplished within existing resources are removing the

concentration restrictions (no more than 10% ADUs in a specified area), removing the parking requirement, and the neighborhood notice requirement. Currently, there are six people on the waiting list to build and ADU/OAU, but are restricted by the concentration restriction. Parking is a common concern, but providing an off-street parking space is a significant barrier considering that the occupancy limits for unrelated people are the same for a home with or without an ADU/OAU. Finally, the requirement for notice creates expectations with neighbors that it is a discretionary review process when it is not. ADU/OAUs are allowed by right.

IX. OPPORTUNITY SITES FOR HOUSING

At the 2014 retreat, City Council requested staff identify opportunity sites for housing. These are specific parcels where the city could help facilitate the construction of needed housing in the near term. Listed below are two city owned sites. **Attachment D** lists partner owned opportunity sites. City owned sites offer the greatest opportunity for the city to have an influence in providing housing in the near term.

Other opportunities are privately owned sites where the property owner is interested in a zoning change to provide more housing. In cases where the Comprehensive Plan (BVCP) land use designation is consistent with the proposed new zoning, the zoning change request can be processed with a Site Review application. If a Concept Plan is required, the zoning change would be included in the Concept Plan proposal that Planning Board reviews. One of the early win tools recommended by staff (in the section above) is to allow City Council to weigh in on Concept Plans. This would give applicants more certainty early on in the development review process.

In the near term, staff proposes to move forward with Palo Park immediately and ***explore different development concepts as part of the CHS for 30th and Pearl*** prior to the Pollard lease expiration in 2016.

<u>City Owned</u>

1) 4525 Palo Parkway

The city owns 4525 Palo Parkway, a 3.2 acre site for which Boulder Housing Partners, in partnership with Habitat for Humanity, has submitted a proposal. The proposal is to develop 35 one, two and three bedroom affordable rental units and nine affordable homeownership units in a plan similar in scale and design to BHP's Red Oak Park. The site plan and density reflect the established character and development patterns in the area.

The site is in Area II. Because it has contiguity with Area I land, it is eligible for annexation. The annexation process could occur concurrently with the Concept Plan and Site Review process. The annexation and Site Review process could begin immediately, with construction completion in approximately two years.

Land Use Designation: Area II, Medium Density Residential
Zoning: NA (zoning would be established at annexation)
Parcel Size: 3.2 acres
Potential new units: 44, based on BHP/Habitat proposal
Process: Annexation and Site Review
Timing: Annexation and entitlement process could begin immediately

Pros:

- In the middle of an established residential neighborhood
- Close to park and recreation facilities and greenways
- Proposal consistent with established development patterns
- Could begin the process immediately with delivery of units in approximately two years
- Site was originally purchased from the Boulder Valley School District, anticipating development as affordable housing

Cons:

- Developing the site prior to completing the CHS removes the site's potential to pursue other CHS goals.

2) 2360 30th St. (northwest corner of 30th & Pearl)

This site is in Boulder Junction. The city purchased this property in 2004 with the goal of providing a transit-oriented mixed use development close to the future RTD bus station, with a substantial amount (up to 50 percent) affordable housing and a mix of ownership and rental units in addition to commercial and ground floor retail uses. Since then, the city has leased back most of the property to the previous owner, Pollards Motors. The current lease will likely be extended through 2016. This is an opportunity to achieve identified outcomes of the CHS through a design competition for the site that would explore new housing types (senior and family friendly designs).

The Transit Village Area Plan calls for three- to four-story mixed use buildings in this district (Pearl Street Center), with either commercial or residential as the predominant use. The plan also states that urban-format, mid-box uses may be considered near the busy, highly visible Pearl & 30th intersection.

At a July 31, 2012 City Council study session, staff provided an updated analysis on the development potential for the site. The developable area – and therefore the estimated number of residential units - has been reduced since original purchase due to a number of factors, including ¾ acres for a future pocket park; the realignment/redesign of Junction Place, 30th Street and Pearl Parkway; the siting of the historic depot building; and other public improvements around the site.

Land Use Designation: Mixed Use Business
Zoning: MU-4
Parcel Size: 5.5 acres, of which 4.3 acres are developable

Potential new units: 60-85, based on analysis for July 31, 2012 City Council study session
Process: Site Review
Timing: Likely not available until after 2016
Pros:

- Purchased and planned for mixed-use development, including affordable housing
- Will contribute to creating a Boulder Junction "neighborhood"
- Close to future RTD bus service and the Goose Creek Greenway
- Full range of retail services nearby

Cons:

- Timing

X. NEXT STEPS

The full project schedule is shown in **Attachment E**.

Council Adoption of Vision and Goals for the Comprehensive Housing Strategy. Staff will schedule a Matters item for Council to consider formally adopting goals based on the outcome of the May 27 Study Session. This is an important first step prior to forming the working groups.

Best Practices. BBC and Clarion Associates will be holding a focus group with local developers, including affordable housing providers, to review national best practices and identify their potential for use in the Boulder housing market. This event is scheduled for late June.

Working Groups. The next step of public engagement is the formation of working groups to explore creative solutions to Boulder's affordable housing challenges. The groups are an opportunity to learn and understand the issues and will be comprised of stakeholders in various focus areas. An opening symposium will be held in the summer with guest speakers to provide a big-picture perspective and inspiration. Each working group will commit to meet two to three times to review and evaluate potential policies and tools specific to their focus. A final symposium will be held in fall to bring working groups together to share insights and findings.

Following Council's discussion of goals on May 27, staff will return to Council with a specific recommendation on the working group process.

Fair Housing Focus Groups. The city's Division of Housing staff is currently preparing an Analysis of Impediments to Fair Housing Choice (AI) in conjunction with the Boulder/Broomfield HOME Consortium. The AI is a federally required review of barriers to fair housing choice with a focus on "protected classes." Federally designated protected classes include disability, familial status, national origin, race, color, religion, and sex.

The AI assists in building public support for fair housing efforts. At the end of May, city staff will be holding a series of focus groups with staff from agencies that work directly with members of protected classes as well as with housing experts such as nonprofit housing providers, realtors, and lenders. Findings and recommendations from these focus groups as well as from the larger AI process will inform the Comprehensive Housing Strategy.

Bang for your buck analysis. Staff will refine the list of potential policies and tools and analyze them against the project goals. This "bang for your buck" analysis will emphasize what level of effort is necessary or which actions or combinations of actions are needed to achieve the project goals. More details on this analysis will be included in the recommendation on the working group process.

Council and Board Direction on Strategy. A Council session is tentatively scheduled for December 2014. Staff will prepare a draft Comprehensive Housing Strategy describing the results of the policies and tools evaluation and propose an initial list of short, medium, and long term actions. Included in the draft report will be a summary of community input and how that input shaped the contents of the strategy. The draft strategy will be reviewed by Planning Board and then refined and finalized for Council consideration in February 2015.

For more information, please contact Jay Sugnet at sugnetj@bouldercolorado.gov, (303) 441-4057, or www.bouldercolorado.gov/chs.

ATTACHMENTS

A. Draft Project Purpose Statement, Key Assumptions and Guiding Principles
B. Permanently Affordable Housing Development Trends (addendum to 2014 Community Profile)
C. Draft List of Policies and Tools – foundation for the Implementation Toolkit
D. Opportunity Sites: Partner Owned
E. Project Timeline

DRAFT PROJECT PURPOSE STATEMENT, KEY ASSUMPTIONS AND GUIDING PRINCIPLES

The following statements were reviewed in initial draft form at the City Council's second study session on the Comprehensive Housing Strategy in May 2013. The draft text below reflects input received at that time.

Purpose Statement

Define priorities and goals for the expansion and preservation of diverse, affordable housing choices in Boulder and identify specific programs and tools to address them in a manner consistent with the community's social, economic and environmental sustainability principles.

Key Assumptions

1. The strategy will build upon Boulder's existing policy context, retaining or potentially expanding current affordable housing goals and programs (e.g., Inclusionary Housing, annexation community benefit, dedicating local and federal funds, 10 percent goal).
2. There are no "solutions" to Boulder's affordability challenges. Demand to live in Boulder will always outstrip the housing supply. However, there are opportunities to respond more effectively and the situation can be improved.
3. The strategy will not focus on the needs or desires of higher-income households because the market is already meeting those needs.
4. It is too late to preempt or significantly address Boulder's loss of affordable detached single-family homes. There is not enough land to add the necessary supply, nor are there the financial resources to provide the necessary subsidy to a large enough number of middle-income households. The strategy therefore may take into consideration the preservation of existing affordable detached housing, or the creation of some new (particularly small-lot) detached homes, but the creation of new detached units is not expected to considerably alter Boulder's affordability challenge.
5. Any expansion of housing opportunities will require expanding the housing supply. However, the strategy will only consider land in the city's service area (Areas I and II) and the Area III Planning Reserve.
6. Given constraints on available land, increasing the supply of housing will require continued consideration of strategies to increase supply and housing choices through infill and redevelopment. This is an approach the city has used in the past and can continue to use effectively.
7. The exploration of any new housing opportunities will integrate and reflect Boulder's commitment to sustainability by considering location, efficient use of land, transportation connections, energy efficiency and context-sensitive design.

Guiding Principles

1. Create great neighborhoods *and* new housing opportunities.
2. Continue and strengthen policies and programs that support those in need.
3. Expand housing choice for middle-income households.
4. Consider the regional context as well as area-specific conditions.
5. Be willing to have candid conversations, and to try new things.
6. Create new forms of partnership to deliver housing that meets community goals.
7. Develop an ongoing strategic planning approach, not "a plan."

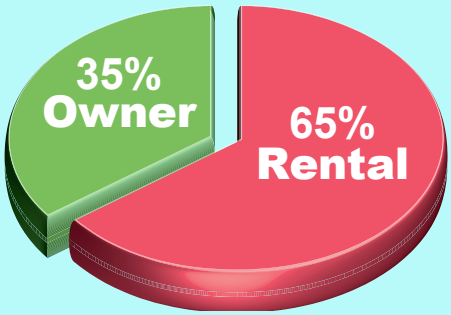
Affordable Housing Development Trends

2000
3.6%[1]
Percent of Affordable Units (1,600 units)

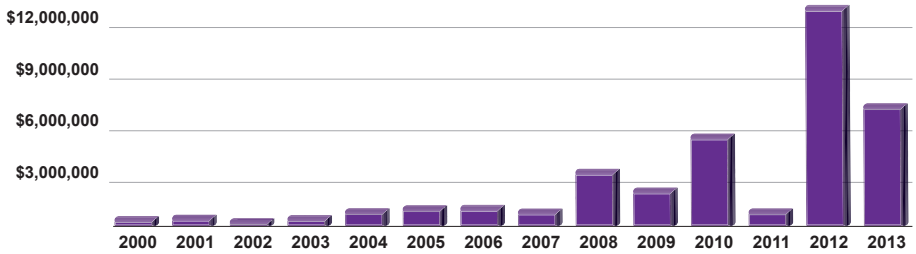
2014
7.2%[2]
Percent of Affordable Units (3,254 units)

10%[3]
City Goal (4,500 units)

Current Permanently Affordable Housing Inventory[1]

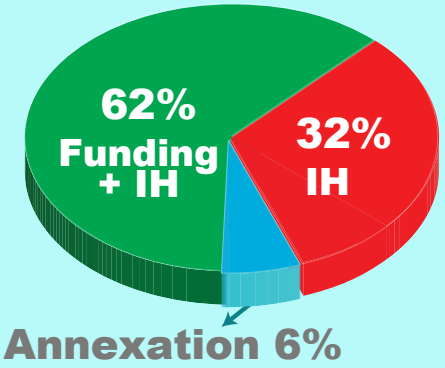


Inclusionary Housing Cash-in-Lieu Payments[1]

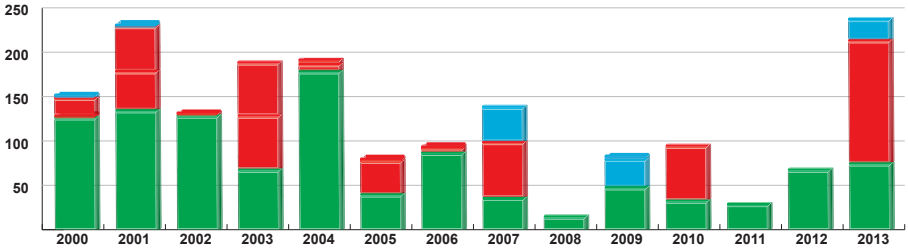


Legend
- Inclusionary Housing (IH)
- Funding + IH
- Annexation

Overall Unit Produced by Source[1]



Permanently Affordable Units Produced by Source[1]



Descriptions of Funding

Inclusionary Housing (IH)

Inclusionary Housing (IH) requires that new residential development contribute at least 20% of the total units as permanently affordable housing. Options for meeting this requirement include providing the permanently affordable units on-site, dedicating off-site newly constructed or existing units as permanently affordable, dedicating vacant land for affordable unit development or making a cash contribution to the Affordable Housing Fund in lieu providing affordable units (cash in lieu goes into the IH + Funding category).

Funding + IH

The Division of Housing administers the city's affordable housing funds. Affordable housing funds are used to build, rehabilitate or acquire permanently affordable housing for low and moderate income residents. They are a mix of federal HOME and CDBG funds and local Community Housing Assistance Program (CHAP) and Affordable Housing Funds (AHF). Sources of the local funds include: property and sales tax revenue, Inclusionary Housing cash-in-lieu contributions and the Housing Excise Tax.

Annexation

The city's policy is to require a high level of community benefit from annexations for residential development. Typically half of the units produced must be permanently affordable to low, moderate and middle-income households.

Example of leverage to build permanently affordable units - $2.5 million of city money leveraged nearly $10 million in outside funding.

HighMar Senior Housing - 4990 Moorhead Ave	Amount	Percent
City of Boulder	$2,587,611	21.2%
Housing Tax Credits	$4,588,278	37.5%
Tax Exempt Private Activity Bond	$3,935,000	32.2%
State of Colorado	$590,000	4.8%
Deferred fees and other sources	$519,048	4.2%
Total	**$12,219,937**	**100.0%**

Footnotes:

1. COB Housing Division.

2. Includes 2,229 permanently affordable units (deed restricted) plus 1,025 units owned by housing partners that are highly likely to remain affordable.

3. The Boulder Valley Comprehensive Plan has a goal to increase the proportion of permanently affordable housing units to 10% of the total existing housing stock (45,000 units at a time).

Potential List of Policies and Tools – May 15, 2014

The Comprehensive Housing Strategy is envisioned as both a strategic framework and implementation toolkit that will guide the city's planning and action initiatives over the coming years. To start the process of determining an appropriate set of tools for the CHS, staff has compiled a list of potential policies and tools for consideration and evaluation over the coming months. This list will become the Implementation Toolkit.

At the end of the list are three examples of tools and potential options for executing each tool. They are illustrative only and serve to demonstrate the next level of analysis of the potential "bang for your buck". An in-depth analysis of each tool will be performed over the summer as part of the Implementation Toolkit.

1. Expand Accessible Housing Options in the Community
Accessible housing units are those designed for people with limited mobility, including those in wheelchairs and those with hearing or vision impairments. This housing tool proposes to increase the number of accessible units in future development and redevelopment. It also proposes promoting universal design techniques that would make more units accessible.

2. Modify Accessory Dwelling Unit/Owner's Accessory Unit Requirements
An Accessory Dwelling Unit (ADU) is allowed in an owner occupied house in low-density residential zones which meet specific criteria. An Owner's Accessory Unit (OAU) is a separate and complete housing unit that can be locate within the primary structure or elsewhere on the parcel. This tool considers ways to promote the use of ADU's, proposes simplifying and loosening the regulations for ADU'S, and suggests new provisions so that ADU's would better serve an affordable housing strategy.

3. Establish an Affordable Housing Board
Currently, the city works with two volunteer committees appointed by the city manager, the Technical Review Group (TRG) and the CDAC (Community Development Advisory Committee). The TRG reviews funding for affordable housing projects and the CDAC reviews Community Development Block Grant (CDBG) funding for nonprofits' capital improvement activities. Additional review processes are in place for affordable off-site projects that meet a market-rate project's Inclusionary Housing requirements. This tool would create an Affordable Housing Board that would, in the words of one City Council member, "vet ideas, create a fiscal plan, and consider funding strategies."

4. Modify the Building Code, Land Use Regulations and the Planning Review Process
This tool would examine real or perceived barriers that development regulations, fees, and review processes create in the development of new housing. The construction of new housing and the rehabilitation of existing housing is governed by the standards in the city's Building Code and Land Use Regulations. The required steps for getting a new development approved and ready to build are called the Development Review Process. This tool suggests options for amending some standards to reduce construction and development costs for specific housing projects, expediting their review process, and ensuring that those savings result in greater affordability.

5. Facilitate Ongoing Affordability of Affordable Homeowners' Association (HOA) Fees
Master-developed land, a major source of new affordable ownership opportunities in Boulder, typically comes with membership in an owners' association. Association dues cover maintenance, capital improvements and upgrades. There is a tension between the desire to ensure all aspects of an affordable home are truly affordable and the needs, desires and emergencies that can increase HOA fees or trigger special assessments. This tool explores options for supporting affordable homeowners without undermining HOAs.

6. Advocate for Housing Choice and Affordability
There is a precedent in Boulder of endorsing policy and action on the state level and beyond that align with our vision for the city. One example is the city signing the Kyoto Protocol thereby assuming a leadership role on the climate change front. This tool defines a process for the active pursuit of changes to state laws that impede housing choice and affordability in Boulder.

7. Encourage More Co-housing
Co-housing is a type of intentional community that provides individual dwelling units, both attached and detached, along with shared community facilities. Members of a co-housing community agree to participate in group activities and members are typically involved in the planning and design of the co-housing project. This tool proposes to amend the Land Use Regulations to allow for more flexible site planning and to identify low-density sites that might be rezoned to allow this use.

8. Encourage More Cooperative Housing
Cooperative housing is a form of rental or ownership housing where unrelated individuals live in one or more residential buildings owned by a membership-based corporation. The existing Cooperative Housing Ordinance is limited to ownership coops and has yet to produce any cooperative housing. Three affordable rental housing coops have been established on lots with nonconforming densities, which is an indirect approach to producing coop housing. This tool proposes changes to the Cooperative Housing Ordinance that would make it a functional avenue for developing cooperative housing, as well as modifications to parking and open space requirements and occupancy limits to allow more opportunities for rental cooperative housing in Boulder.

9. Provide Density Bonus for Higher Levels of Permanently Affordable Housing
Provide developers with an incentive to go above and beyond the current Inclusionary Housing requirements by providing a density bonus for additional affordable units. This tool has been used successfully in one of the city's mixed density residential zones.

10. Expand Down Payment Assistance Program and Reinstate Gap Financing
Boulder's Homeownership Program operates two Down Payment Assistance programs, the Solution Grant, which provides qualified buyers with down payment grants to assist with the purchase of permanently affordable homes in Boulder and the H2O Loan, which helps low to moderate income households to cover down payment and closing costs to purchase homes on the open market. This tool would explore expanding down-payment assistance.

Gap financing is the difference between what a household can afford and the market value of the property. In exchange, covenants are added to the deed of the home, making it permanently affordable to people in a moderate-income range. The city had a gap financing program that was discontinued due to the size of grants required and the desire to help more households. This tool would evaluate reestablishing a gap financing downpayment assistance program.

11. Explore Employer-Assisted Housing

There are various types of employer assistance that may be offered to employees. One type is provided directly to the individual employee in the form of mortgage subsidies, down payment assistance, relocation payments and the like. A second type of employer assistance would increase the supply of housing by requiring or encouraging employers to participate in the development of additional housing units through such actions as the provision of land, construction financing or purchase/lease guarantees, and down-payment assistance. This tool proposes a city role in educating employers about housing assistance options, researching possible sites for employer-assisted new housing and exploring a pilot project for housing city employees.

12. Increase Enforcement of Existing Regulations

Noncompliance with existing regulations is sometimes identified as a barrier to implementing other tools. For example, neighbors and community members often have concerns about housing options that increase density such as ADUs, cooperative housing, and even multifamily apartments, whereas density is typically a proxy for concerns about behavioral or parking issues. Additionally, some owners of homes in Boulder use these houses as vacation rentals by owner, effectively removing them from the housing stock though prohibitions exist in our code to address these behaviors. This tool highlights the importance of compliance with city code in ensuring that the existing housing stock and housing options that introduce density remain viable.

13. Reevaluate Shared Equity Loan Program

Shared equity loans or equity pool programs offer prospective homeowners downpayment assistance in exchange for a proportionate share of future equity. Use of this tool would increase the number of moderate-income or middle-income homebuyers who could afford to purchase a home in Boulder. The city replaced a shared equity loan program with the permanently affordable program in the 1990s. This tool looks at three variations for funding an equity pool. The discussion of downpayment assistance (Tool 10) is related to this tool.

14. Continue Purchase Program for Existing Housing Units

Public funds are used to purchase existing housing units by the city or a nonprofit organization for resale or for rental to low- or moderate-income persons. This tool suggests that following the purchase, a deed restriction is placed on the unit in order to ensure long-term affordability. The unit is resold at a discounted price to a low-income or moderate-income buyer.

15. Explore Fee/Tax Waivers to Incentivize Housing that Meets Specific City Goals

This tool would explore property tax abatement programs, exemptions from development requirements (parking, open space, inclusionary housing), and PIF waivers for specific types of housing projects that achieve specific city goals.

16. Promote Green and Location Efficient Mortgages

Green mortgages, also called Energy-Efficient Mortgages, allow the homebuyer to roll the costs of making specific energy-saving improvements into the purchase price of a home. Location Efficient Mortgages® increase the borrowing ability of homebuyers in areas that are more walkable and provide good multimodal access on the assumption that households in these areas will have more income available that can be directed toward housing. These tools would give the homebuyer more options on the housing market through greater purchasing power and greater affordability due to lower energy and transportation costs.

17. Refine or Change the Inclusionary Housing Program

The city's Inclusionary Housing Ordinance (IH) requires that new residential development contribute at least 20% of the total units as permanently affordable housing. Options for meeting this requirement include providing the permanently affordable units on-site, dedicating off-site newly constructed or existing units as permanently affordable, dedicating vacant land for affordable unit development or making a cash contribution to the Affordable Housing Fund in lieu of providing affordable units (Cash-in-lieu). This tool would determine ways to promote the various goals of the Comprehensive Housing Strategy through the Inclusionary Housing Program.

18. Continue Land Banking

Land banking is the purchase of land by the city or a nonprofit housing corporation. The land is planned as a future site for affordable housing. The city has used this tool selectively in the past. Land contribution is one option available to a developer to fulfill the Inclusionary Housing requirement. This tool proposes expanding current land banking programs and identifying appropriate medium density and mixed use sites for land banking.

19. Encourage Community Land Trusts

A Community Land Trust (CLT) severs the value of the land and the improvements (i.e., the homes) and maintains ownership of the land in perpetuity. The land is leased to the residents who own homes on the leased land; their ownership is subject to restrictions on use and resale that keep the units permanently affordable. Thistle Communities currently operates a CLT program that provides permanently affordable homeownership opportunities in Boulder. This tool would encourage additional nonprofit partners to establish community land trusts.

20. Expand Linkage Fees for Non-Residential Development

This tool links job creation and the need for affordable housing. A linkage program requires that new non-residential development that generates jobs contribute housing based on a community-wide analysis of the type and amount of jobs and wages expected to be generated by the new development. Housing units could be built on or off-site from the employment, or a fee could be paid in lieu of providing housing. In Boulder in the DT-5 zone the portion of new commercial development that results from a density bonus is subject to a linkage fee. This tool proposes exploring expanding the linkage program to other areas of the city.

21. Establish More Mixed Use in Commercial and Industrial Zones in Targeted Areas

Mixed use is the planned combination of residential uses with either commercial or industrial uses. Ideally, the various uses are carefully integrated and the project has a pedestrian orientation.

This tool has been successfully used in Boulder Junction and in North Boulder and could be applied in other targeted areas of the city. An example would be Envision East Arapahoe.

22. Study Mobile Home Parks
Mobile home parks house hundreds of Boulder's lower-income residents. This tool suggests continuing efforts by the city or nonprofit housing corporations to purchase existing mobile home parks to either preserve them or to replace with additional permanently affordable units.

23. Revisit Occupancy Limits
The Land Use Regulations limit the number of unrelated persons who may occupy a dwelling unit. The current code allows up to three unrelated persons in low-density residential districts, and up to four in medium-density and high-density districts. If the code allowed more unrelated persons to occupy a dwelling unit, greater affordability may result and other tools in this toolkit (cohousing, cooperative housing, aging in place options for seniors) would be enabled. Use of this tool would raise or eliminate the limit (citywide or in specific areas).

24. Other Revenue Sources for Affordable Housing
This tool would broadly explore other sources of revenue for affordable housing such as occupation/head tax, hotel/accommodations tax, sales tax and property taxes.

25. Participate in Regional Solutions
The availability of affordable housing has become an increasing concern throughout the county and the region. A regional approach to meeting affordable housing needs may be required. With more and more workers commuting farther between home and work, increased traffic and the resulting greenhouse gas emissions and congestion have become a greater concern. This tool includes initiating a regional dialogue on affordable housing and the associated regional transportation solutions.

26. Expand the Home Rehabilitation Loan Program
Home rehabilitation loans are available to low income households in Boulder for the purpose of making energy efficiency, code and safety repairs. Use of this tool could include an increase in the amount of money available for loans, or a change to the program criteria to allow loans to moderate-income and high/moderate-income households wishing to modernize their homes.

27. Remove Barriers for Certain Housing Types
Certain housing types, not currently being built, may be desirable in Boulder. Ideas include Portland's courtyard housing, Austin's Alley Flats, and micro units. This tool could create greater housing choice and, in some cases, more affordable market options to meet the needs of a variety of people who live and work in Boulder. This tool suggests reviewing the desirability of various housing options and adapting the code and regulations to allow for varied housing types.

28. Explore Rent Control
A rent control system would regulate the levels of rent, or rent increases, permitted within the city. Rent control is now illegal in Colorado. This tool suggests the initiation of a community discussion about the benefits and down sides of rent control, and a council decision about whether amending the state statutes should be a part of the city's legislative agenda.

29. Increase Residential Density

Increasing residential densities in some parts of the city may be one way to increase the amount of affordable housing. This tool proposes looking within the city and Area II to selectively find good sites for increased residential density, such as in industrial zones, and considering changes to the land use and zoning. Another option would be to raise height limits selectively along transit corridors and commercial centers, which would require a charter amendment. Clustering of units in larger projects, coupled with city purchase of the resulting open space, is another option. The discussion of Accessory Dwelling Units, Inclusionary Housing, linkage programs, mixed use, and occupancy limits are related to this topic.

30. Revisit the Residential Growth Management System (RGMS)

Boulder's current RGMS was designed to manage the rate of residential growth to less than one percent annually and to encourage homebuilders to provide affordable housing. Anyone building a residential unit must first secure an allocation, and the number of allocations is limited each year. Exemptions have been added over the years for mixed use and affordable housing. Revising or eliminating this tool could be explored.

31. Explore Reverse Mortgages

This tool proposes the expansion of a program which provides equity to an older homeowner, in a lump sum or monthly payments, based on the equity value of their home. It is used in cases where older homeowners might wish to remain in their homes but need additional financial assistance. This type of program is usually provided through banks, and one option suggests a city marketing effort to promote the use of this tool.

32. Consider Land Use Designation and Zoning Changes

This tool considers land use designation and/or zoning changes in specific locations through an area planning process (e.g. Envision East Arapahoe) or a Boulder Valley Comprehensive Plan update to allow more residential development where it's currently limited or prohibited. Locations could include underutilized commercial areas, transit corridors, over-sized rights-of-way, industrial areas, and/or the Area III Planning Reserve. In addition, specific changes could be made to the zoning code, such as to allow duplexes on corner lots or reduce minimum lots sizes in single-family zones.

33. Expand Section 8 Voucher Options

For a variety of reasons including the gap between the area's Fair Market Rent (FMR) and what private landlords can command for rent in Boulder, Section 8 voucher holders, individuals and families, struggle to find rentals in Boulder. This tool would develop local incentives for landlords to participate in Section 8 voucher programs. Other tools include participating in HUD's Fair Market Rent (FMR) demonstration program, which allows higher FMRs based on zip codes and passing a city ordinance that makes Source of Income (including Section 8) a protected class (i.e., prevents landlords from refusing to accept Section 8 tenants).

34. Expand Senior Housing Options

As the baby boom generation becomes seniors, demand for housing for seniors at all income levels is growing in our community. This tool looks at ways to provide housing for seniors to "age in place," and offer seniors housing options with accessibility, affordability, low maintenance and

needed support services.

35. Expand the Service Area

The Boulder Valley Comprehensive Plan identifies four areas: Area I is the current city limits; Area II land (the Service Area) is anticipated to be annexed and developed to urban densities; Area III is intended to preserve existing rural land uses and character; and the Area III/Planning Reserve is where the city and county maintain the option of expanded urban development beyond the 15-year timeframe. The Boulder Valley Comprehensive Plan provides a process to expand the Area II Service Area into the Area III/Planning Reserve. Use of this tool would open the discussion about the future development of the Planning Reserve to the end of providing additional land for affordable housing. An option also suggests land banking in the Planning Reserve as a way to reserve land for the future development of affordable housing.

36. Restrict Unit Size

This tool suggests exploring incentives (such as graduating development fees) and disincentives to building very large units (such as requiring a Transfer of Development Rights). This tool also suggests disincentives for major expansions of existing smaller homes. Smaller homes, particularly those that are deed restricted, may provide a source of relatively inexpensive housing.

37. Support Special Population Housing

Special populations include those people with disabilities, the chronically mentally ill, homeless individuals and families, and those at risk for homelessness. These groups are often included in the very-low income group. The strategy supports maintaining the current level of funding and building new partnerships between nonprofit housing developers, special population service providers, and private developers to provide more housing for them.

38. Improve Existing Student-Oriented Housing

This tool includes options to address the problem of poorly maintained rental properties, primarily located in the University Hill area. This has been an ongoing problem, though recently (2014) there has been investment in the University Hill area, including some new, higher end student housing developments as well as boarding house conversions. There continue to be ongoing problems in the University Hill area including trash, weeds, parking and noise, although code enforcement efforts a have been strengthened in recent years. The university, the city, and the neighborhoods are actively partnering to address these and other off-campus student housing issues. This tool requires ongoing vigilance on these issues as well as new approaches.

39. Encourage University-Related New Housing

This tool calls for increased housing for university students, faculty and staff, both on-campus and off-campus. On-campus housing would be constructed on university-owned sites. One example of the successful addition of off-campus housing was the city-initiated land use changes, rezoning and ongoing private redevelopment of the area on and near the 28th Street Frontage Road, which is producing hundreds of new units of housing, much of which serves students. Further opportunities could be identified to redevelop and or rezone appropriate sites near campus. These units would most likely be rental units in apartment complexes, but could also be condominiums or townhouses. This tool would be used to increase the supply of housing targeted to university students and university employees.

Analysis of Tools (Illustrative Only)

Three tools (Modify Accessory Dwelling Unit/Owner Accessory Unit Requirements, Encourage Cooperative Housing and Participate in Regional Solutions) are included in this section in order to demonstrate the next level of analysis of the potential "bang for your buck" of various options for expanding these tools. These three examples are illustrative only. An in-depth analysis of each tool will be performed over the summer as staff develops the Implementation Toolkit. The project goals will be a guiding factor in the evaluation as well.

Tool 3: Modify Accessory Dwelling Unit/Owner's Accessory Unit Requirements

Description

An Accessory Dwelling Unit (ADU) is a housing unit allowed in an owner-occupied house in low-density residential zones which meet specific criteria. An Owner's Accessory Unit (OAU) is a separate and complete housing unit located on the lot or parcel of the primary dwelling unit. (Both will, in this discussion, be generically referred to as "ADUs" or "accessory units" where no variation exists between them.) This tool considers ways to promote the use of ADUs, proposes simplifying and loosening the regulations for ADUs, and suggests new provisions so that ADUs would better serve an affordable housing strategy.

Background

There are a number of constraints that limit the potential of ADUs as a housing option in Boulder.

Subsection 9-6-3(a) of the land use code contains the following limitations on all types of accessory dwelling units:

- At least one owner of the property must reside in the primary or accessory unit;
- No more than two additional persons may occupy the additional dwelling unit and no rooms in the owner's unit may be rented;
- Adjacent property owners are notified of the application by mail and a notice is posted on site;
- Applicant must obtain a current rental license within 180 days of approval;
- The permit is revoked if the property owner does not comply with other ordinances of the city which regulate property maintenance and nuisances;
- Approval for an accessory unit runs with property owners, not the property. When ownership changes, the ADU must be removed or the new owner must reapply.

Additional constraints that may serve to limit the establishment of ADUs include density limits, parking requirements, lot size requirements, and limits on the size of the ADU.

Boulder's accessory dwelling unit ordinance has been in place for 30 years. Proposed amendments over the years have consistently focused on the issues of concentration, parking, size, and occupancy. If the city is interested in encouraging the creation of more accessory dwelling units, some of the current barriers in the regulations may merit reconsideration.

How many units in Boulder?
At the time of the Accessory Dwelling Unit Study (December 2012) prepared by the Community Planning and Sustainability staff, in Boulder there were:

186 Accessory Dwelling Units
42 Owner Accessory Units
1 Limited Accessory Unit

OUTCOMES

Who benefits directly or indirectly?
Currently, beneficiaries of ADUs include owners who receive a supplemental income from their ADU, relatives of the homeowner including aging parents, service workers and others with low to moderate incomes, and aging homeowners who can house caregivers in exchange for care services.

A December 2012 survey by the National Research Center, Inc. found that 75 percent of homeowners in Boulder rented their ADUs to paying tenants (an additional 4 percent lived in the ADU and rented the main house) and 5 percent of ADUs were occupied by relatives. The occupations of ADU dwellers included professionals (41 percent), students (20 percent), service workers (17 percent), retirees (10 percent) and the balance were "other". Based on homeowner estimates, half (51 percent) of ADU tenant households earned less than $40,000 annually.

What is the estimated impact of using this tool?
Moderate. Ultimately this tool relies on private homeowners' desire to have an accessory unit. There are, however, a number of constraints on ADUs that, if lifted would likely enable more homeowners to establish ADUs.

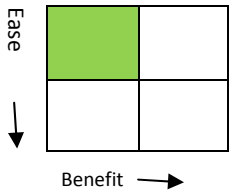
What kind of housing would result?
This type of housing is a market-rate option that can provide an affordable housing option as well as offset housing costs for the homeowner. Accessory units can house young professionals, service workers, students and seniors. ADUs can also support older homeowners wishing to age in place by serving as a source of supplemental income, housing a caregiver or housing a tenant who can offer assistance with home maintenance and upkeep.

Option 1: Increase or eliminate the 10 percent saturation requirement.

Option Description
This option would require a city ordinance update that would increase or eliminate the 10 percent saturation requirement.

This provision is unique among ADU ordinances across the nation. Considering the relatively low number of applicants currently on the waiting list, it may be worth discussing whether certain zone districts should allow higher saturation rates or the 10 percent saturation requirement should be eliminated entirely.

Impact Matrix

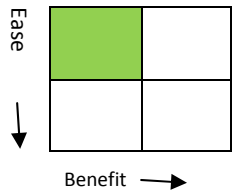
Option:	Increase or remove the 10% saturation requirement.
City's History with the Tool:	ADUs have been allowed in Boulder for 30 years.
Where applied?	In zoning districts where ADUs, OAUs and LAUs respectively are already allowed.
Potential Timing:	Five months
Legal Issues:	Minor, but will require CAO involvement because it would be a code update.
Staff Time/Resources Required:	Moderate (Staff time needed to research and update code)
Change to Current Policy:	Low-Moderate
Scale of Impact:	Small
Overall:	

Option 2: Eliminate the parking requirement for ADUs.

Option Description
This option would require a city ordinance update that would eliminate the parking requirement for ADUs.

Parking has been cited as one of the primary obstacles to creating a legal accessory unit. Currently, ADUs and OAUs require one additional off-street parking unit beyond what is required for the principal dwelling unit and LAUs must have three off-street parking spaces. Parking is a common concern among neighbors, but providing an off-street parking space has proven to be a significant barrier and the occupancy limits for unrelated people are the same for a home with or without an ADU/OAU. Eliminating the parking requirements for accessory units may increase the number of these units.

Impact Matrix

Option:	Eliminate parking requirements for ADUs, OAUs and LAUs.
City's History with the Tool:	ADUs have been an allowed use in Boulder since 1982. Over the years, parking requirements have been cited as a barrier to the creation of new ADUs.
Where applied?	In zoning districts where ADUs, OAUs and LAUs respectively are already allowed.
Potential Timing:	Five months
Legal Issues:	Minor, but will require CAO involvement because it would be a code update.
Staff Time/Resources Required:	Moderate (Staff time needed to research and update code)
Change to Current Policy:	Low-Moderate
Scale of Impact:	Medium
Overall:	

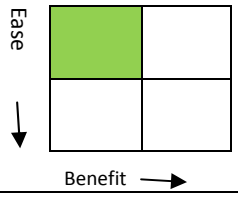
Option 3: Eliminate the public notice requirement for ADUs.

Option Description

This option would require a city ordinance update that would eliminate the public notice requirement for ADUs.

Subsection 9-6-3(a) of the land use code requires adjacent property owners to be notified of the application by mail. This requirement for notice creates expectations with neighbors that the ADU/OAU review process is discretionary when it is not; ADU/OAUs are allowed by right. Furthermore, the public notice requirement may dissuade homeowners from pursuing ADUs or introduce unwarranted complications into the process, reducing the potential of accessory units as a housing choice in Boulder.

Impact Matrix

Option:	Eliminate public notice requirements for accessory units.
City's History with the Tool:	ADUs have been an allowed use in Boulder since 1982 years.
Where applied?	Citywide
Potential Timing:	Five months
Legal Issues:	Moderate (will require some CAO involvement because it would be a code update.)
Staff Time/Resources Required:	Minor, but will require CAO involvement because it would be a code update.
Change to Current Policy:	Low-Moderate
Scale of Impact:	Low
Overall:	

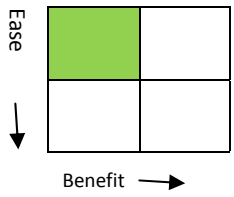
Option 4: Adjust the size requirements for ADUs.

Option Description

Currently, ADUs are required to be *"the lesser of 1/3 of the size of the principal dwelling unit or 1,000 square feet*". This regulation limits the options of people with smaller homes with regards to ADUs. For many people with smaller homes, it may not be possible to create an ADU using only 1/3 of their floor area.

This restriction can also make basement conversions difficult in cases where the basement space accounts for half of the house's square footage. To meet the size restriction, a small portion of the basement may need to be excluded from the ADU conversion. In Portland, Oregon, the maximum size of an ADU may not exceed 75% of the living area of the house or 800 square feet, whichever is less. The overall size is smaller than what is allowed in Boulder; however it may allow for more flexibility within the existing structure. It may be worth considering changes to the current restriction to maintain the 1,000 square foot restriction but allow for increased flexibility within the existing structure.

Impact Matrix

Option:	Increase the size limit on ADUs to "the lesser of 75% of the size of the principal dwelling unit or 1,000 square feet".
City's History with the Tool:	ADUs have been in Boulder for 30 years.
Where applied?	In zoning districts where ADUs and OAUs are already allowed.
Potential Timing:	Five months
Legal Issues:	Minor, but will require CAO involvement because it would be a code update.
Staff Time/Resources Required:	Moderate (Staff time needed to research and update code)
Change to Current Policy:	Low-Moderate
Scale of Impact:	Medium
Overall:	

Tool 8: Encourage Cooperative Housing

Description

Cooperative housing is a form of rental or ownership housing where unrelated individuals live in one or more residential buildings owned by a membership-based corporation. The existing Cooperative Housing Ordinance is limited to ownership coops and has yet to produce any cooperative housing. Three affordable rental housing coops have been established on lots with nonconforming densities, an indirect approach to producing coop housing. This tool proposes changes to the Cooperative Housing Ordinance that would make it a functional avenue for developing cooperative housing, as well as modifications to parking and open space requirements and occupancy limits to allow more opportunities for rental cooperative housing in Boulder.

Background

When the 1999 Toolkit of Housing Options was written, Cooperative Housing had been defined for about two years in the Boulder Revised Code (B.R.C. 1981 section 9--6--3(b)) as a conditional land use, yet no cooperative housing had been generated through that section of the code. Fifteen years later this continues to be true. One organization, the Boulder Housing Coalition (BHC), an affordable housing nonprofit, has established three affordable rental housing cooperatives in Boulder; however all were established on nonconforming lots and through an administrative review process. The BHC reports that while there is significant demand for cooperative housing, they have been slow to meet the demand as a result of the challenges of finding properties with the necessary grandfathered nonconforming density that is conducive to establishing new cooperative housing. Challenges to establishing new housing cooperatives under B.R.C. 1981 section 9--6--3(b) include: considered a conditional use, applies only to equity cooperatives (residents own shares of the property they occupy), caps the number of residents at six (while a household needs about ten members to function well), requires all members of the household to maintain an unlimited use transit pass, and requires off-street parking and floor space per inhabitant. Though cooperative housing is a cost effective housing option in keeping with the city's sustainability goals and the desire to expand housing choice and affordability, the existing cooperative ordinance has never produced housing and any entity wishing to establish cooperative housing must overcome significant hurdles.

How many units currently?

Masala (Boulder Housing Coalition)	10 Rooming Units
Chrysalis (Boulder Housing Coalition)	11 Rooming Units
North Haven (Boulder Housing Coalition)	22 Rooming Units

OUTCOMES

Who benefits directly or indirectly?

Many types of people could benefit including the low income, seniors, families, special needs individuals, low wage service workers, entry level professionals, students and renters.

What is the estimated impact of using this tool?
Moderate. One organization that has previously struggled to establish cooperative housing in Boulder could create more affordable cooperative opportunities with greater ease. Other affordable housing providers could, with fewer constraints, develop cooperative housing and perhaps market-rate cooperatives could move forward as well. This tool would create more housing choice and affordable housing for those willing to share living space and contribute to consensus-based governance.

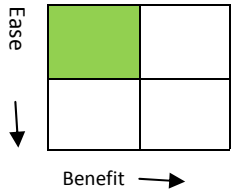
What kind of housing would result?
The basis of cooperative housing is shared governance. To date in Boulder, cooperative housing has been established in rehabbed housing – two older, large former single-family homes and an older apartment building. In these housing coops, income-qualified renters have private bedrooms and share common amenities such as kitchens, living rooms and bathrooms. Two separate family apartments are part of one existing housing cooperative. Existing cooperative housing in Boulder is energy-efficient, affordable, and a relatively efficient use of land in the community. Design does not define cooperative housing and cooperative housing could exist in a variety of innovative rehabbed or new-built housing types. Additionally, while the existing cooperative housing is income restricted, coops could be established without income requirements.

Option 1: Rewrite the Cooperative Housing Unit conditional land use to be easily usable.

Option Description
This option would require a city ordinance update that would address some or all of the objections to B.R.C 1981 Section 9-6-3(b) Cooperative Housing Units conditional land use cited by cooperative housing advocates, including:

- B.R.C 1981 Section 9-6-3(b) is designed to work with the shared equity or ownership model of cooperative and not rental cooperatives.
- B.R.C 1981 Section 9-6-3(b) limits occupancy to six whereas cooperative housing typically needs ten or more occupants to function and be an affordable and financially viable option for resident or for an affordable housing cooperative.
- Residents are required to be EcoPass holders, yet, in the experience of the Boulder Housing Coalition, the cost is burdensome on its low-income residents and on the organization.
- B.R.C 1981 Section 9-6-3(b) off-street parking and floor space per inhabitant requirements make it difficult to identify appropriate existing residential properties.

Impact Matrix

Option:	Rewrite the Cooperative Housing Unit conditional land use to facilitate the creation of cooperative housing.
City's History with the Tool:	B.R.C. 1981 Section 9-6-3(b) has been in place since 1997 and has not produced cooperative housing in Boulder.
Where applied?	Citywide or only for nonprofit-sponsored projects.
Potential Timing:	Five months
Legal Issues:	Moderate (will require CAO involvement.)
Staff Time/Resources Required:	Moderate (Staff time needed to research and update code)
Change to Current Policy:	Low-Moderate
Scale of Impact:	Medium
Overall:	

Tool 25: Participate in Regional Solutions

Description

The availability of affordable housing has become an increasing concern throughout the county and the region. A regional approach to meeting affordable housing needs may be required. With more and more workers commuting farther between home and work, increased traffic and the resulting greenhouse gas emissions and congestion have become a greater concern. This tool includes initiating a regional countywide dialogue on affordable housing and the associated regional transportation solutions.

Background

In 2014, residents of Boulder and in-commuters were given the opportunity to respond to a *Housing Choice Survey.* Over 3,000 people participated. While the survey found that there are many who would chose to live in Boulder given the right opportunity, not everyone who works in Boulder wants to live in Boulder. Additionally, though there are significant opportunities to expand Boulder's housing stock, Boulder will not be able to house its whole workforce. We have become more interdependent with the region. And at the same time that Boulder faces its own growth constraints, nearby communities face unique and dynamic housing opportunities and challenges as well. To promote regional housing solutions and reduce the negative consequences of a large in-commuting workforce (e.g., increased greenhouse gas emissions, large transportation cost burdens, and traffic congestion), this tool emphasizes engaging in meaningful regional dialogue.

OUTCOMES

Who benefits directly or indirectly?
Potential beneficiaries of a regional approach to housing and transportation would include the workforce, those who rely on transit, vulnerable populations, low to middle income households, employers, our environment and future generations.

What is the estimated impact of using this tool?
Unknown. The potential of this tool is entirely dependent on the ability to incite and/or contribute to bold efforts to cooperate regionally.

What kind of housing would result?
A regional dialogue around housing could produce a better match between housing and the workforce and ensure that communities throughout the region preserve and pursue affordable housing for their residents.

Option One: Engage in a regional housing discussion.

Option Description

This option would require City of Boulder staff and other city leaders to prioritize regional housing as a work item, to assign resources to this effort, to engage in regional dialogue with a solutions mindset, and to catalyze meaningful discussion with public and private entities in the county and in the broader region.

Impact Matrix

Option:	Commit staff time to engage in regional efforts such as the Sustainable Cities Initiative and identify and create opportunities to dialogue with other regional partners about regional housing.
City's History with the Tool:	The city has an ongoing relationships with a number of communities through the HOME Consortium, RTD, DRCOG, and even the recent flood event. Despite years of interest, a *dedicated* on-going regional housing dialogue would be a new undertaking.
Where applied?	Region-wide; Boulder County and beyond.
Potential Timing:	Years; Ongoing
Legal Issues:	No obvious legal issues.
Staff Time/Resources Required:	High (Staff and leadership time to participate in and inspire regional dialogue and activities)
Change to Current Policy:	Low
Scale of Impact:	Dependent on ability to find workable regional solutions and regional partners; potentially large or small
Overall:	Ongoing dedicated effort; unknown potential

OPPORTUNITY SITES

At the 2014 retreat, City Council requested staff identify opportunity sites for housing. These are specific parcels where the city could help facilitate the construction of needed housing in the near term. Listed below are partner owned opportunity sites.

Partner Owned

1) Red Oak Park II (2625 Valmont)
Boulder Housing Partners (BHP) acquired the former Wallace Vacuum and Sewing property in 2012 to add to the recently developed, award-winning Red Oak Park I neighborhood to the east. Red Oak Park I converted the Boulder Mobile Manor mobile home park into a neighborhood of 59 attached and detached, fixed-foundation homes.

This site's current land use designation and zoning are for business, but these could be changed with a rezoning as part of the Site Review process.

BHP recently hosted a design charrette with the support of Housing Colorado and the University of Colorado to look at the potential development of this property and the remaining Red Oak Park I vacant "front lots" along Valmont, as well as commercial properties along Folsom Street, including the 7-11 at the corner of Folsom & Valmont and the lot adjacent to the north. The charrette looked at two scenarios: one was just for the property owned by BHP (2625 Valmont and the Red Oak Park I front lots); the other also included the privately owned 7-11 property and the lot to the north, as a potential mixed use, public-private partnership. More detailed information on the scenarios will be available on the BHP website after May 15.

Land Use Designation:	General Business
Zoning:	BC-1
Parcel Size:	0.78 acres (1 acre if other lots included)
Potential new units:	46 if just BHP property is developed, or 75 if two private lots are included, based on BHP charrette analysis
Process:	Rezoning and Site Review
Timing:	BHP is planning to begin the development process in 2014, possibly 2015

Pros:

- Purchased and planned for affordable housing
- Will augment and strengthen adjacent Red Oak Park I neighborhood
- Phased design and implementation could ensure integration of the entire Folsom & Valmont corner
- Could be designed in concert with commercial properties along Folsom to create a mixed use center for the broader neighborhood
- Higher density could allow for a range of unit types, levels of income and mixed need populations

Cons:

- Expanded scenario requires partnerships with current business owners so timing for this option is uncertain

2) 2121 Broadway (Spruce & Broadway northwest corner)
This site is a parking lot owned by CAGID (Central Area General Improvement District) established to serve the parking demand of downtown. At the city's request, an exploratory, schematic plan for adding housing to the site was prepared by Shears-Adkins Architects in 2003. It showed five levels of parking (153 stalls), a commercial wrap at grade, two levels of residential wrap on parking levels two and three, and residential on the fourth level. However, it assumed waivers for setback and open space requirements, would exceed the allowable FAR and was not consistent with the downtown design guideline regarding height within the first 35 feet of street frontage.

Land Use Designation: Regional Business
Zoning: DT-2
Parcel Size: 0.48 acres
Potential new units: Shears-Adkins sketch plan showed 17 units
Process: Additional analysis and decisions by city staff, council, the Downtown Management Commission (CAGID advisory board) and CAGID board of directors prior to an RFP process; later, Site Review would include with review by Landmarks Board and Boulder Design Advisory Board
Timing: Not yet determined
Pros:

- Downtown location
- Removing surface parking could increase vitality and visual interest at a key downtown intersection

Cons:

- CAGID property has the sole purpose to serve parking for downtown uses; providing parking for new housing units could reduce the parking available for businesses. The primary use on the site needs to serve the purpose of CAGID or the property value needs to be translated into additional parking capacity for the downtown. The decision would have to be made to use a CAGID property for non CAGID uses, sell the property and use the proceeds for parking. An analysis would have to be done from the CAGID perspective if this was an appropriate use of CAGID property.
- Relatively small parcel size reduces economy of scale for building housing units and structured parking

3) CU Family Housing Site (17th Street to Folsom, south of Arapahoe)
CU Boulder owns much of the land south of Arapahoe and Naropa and between 17th Street and Folsom. They are envisioning rebuilding much of this area as family-friendly student housing at higher densities than exist today.

Multiple studies and workshops have been held about this site. Currently CU Boulder has design consultants studying the area. CU Environmental Design Faculty Michael Tavel and David Kahn just had their students study the area as part of that Program's Praxis Semester and their work will be on line by mid-May. Their topic was "What would a child-friendly, high density, sustainable urban neighborhood look like for Boulder."

Land Use Designation: High Density Residential (mostly)
Zoning: P (mostly)

Parcel Size: 40 acres of developable land
Potential new units: 1,200 +/-
Process: Collaborating with CU Boulder
Timing: Build-out over next 5-15 years, approximately
Pros:

- Opportunity for dense, family-friendly urban neighborhood development close to public transit, bike paths, downtown and CU
- Opportunity for mixed-income and cultural diversity
- Opportunity for mixing CU family housing needs with city needs
- Opportunity to provide comprehensive solution to CU Boulder and City of Boulder interface

Cons:

- Much of land within 100 year floodplain
- No daycare permitted within 100 year floodplain

Other Sites

The following city and partner-owned sites were identified as possible opportunity sites. These sites are not recommended to pursue at this time due to the complexity of the issues, the amount of public process, and/or the need for actions by other organizations to make these projects feasible as a short term housing opportunity.

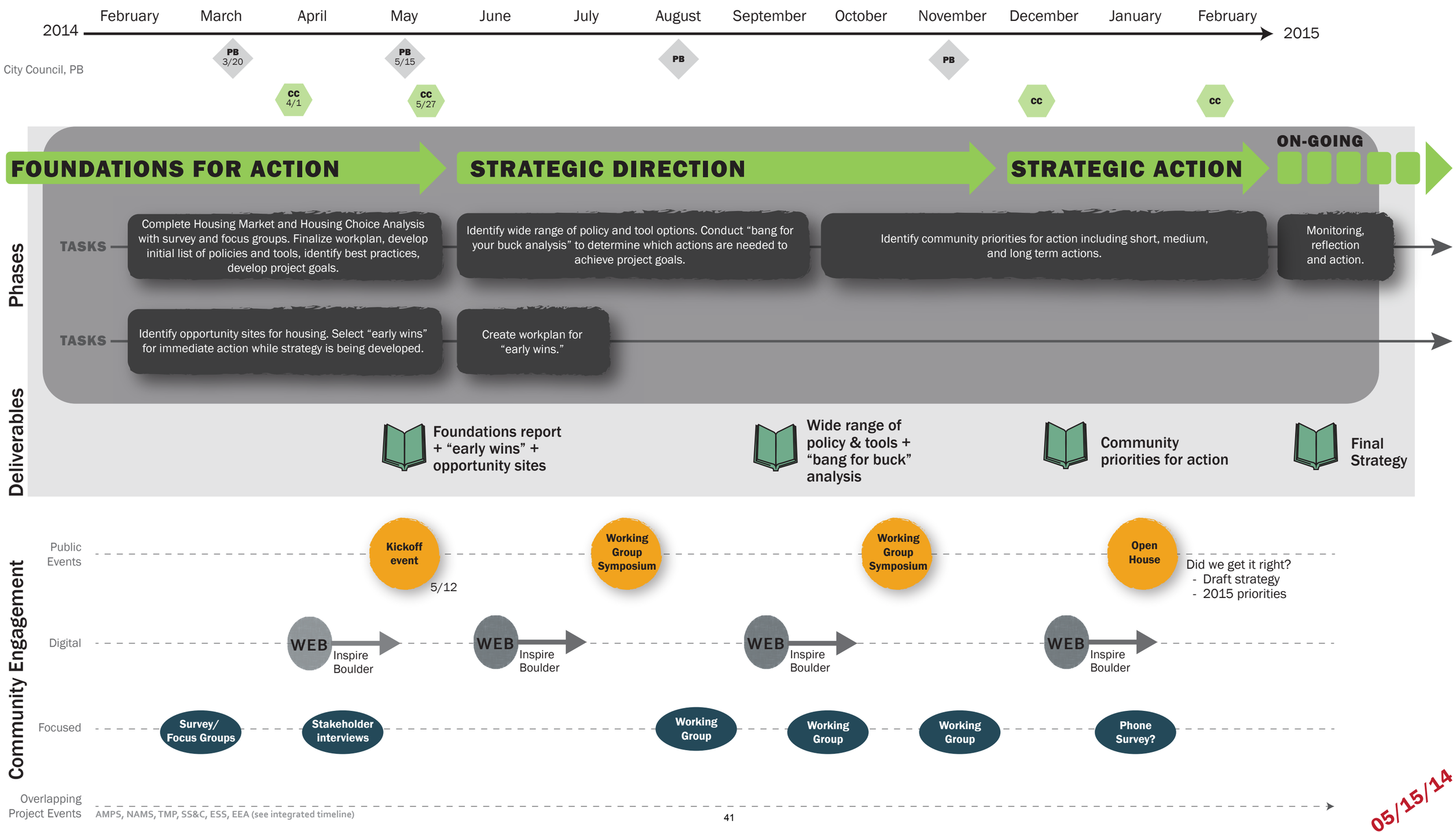
1. 3300 Airport Road (IG zoning): This is part of the Boulder Airport property. Its land use designation was changed from Public to Light Industrial in the 2010 BVCP Update. Other land use options considered at that time were Medium or High Density Housing.

2. Mapleton ball fields (P zoning): This is a Parks & Recreation property. It was discussed last year as a potential alternative location for the Scott Carpenter Park Fire Station, which is subject to flood hazard, possibly combined with structured parking and affordable housing.

3. Foothills Community II (RM-1 zoning): This BHP-owned site is adjacent to Foothills Community I in North Boulder, built by BHP in 2000. Although additional housing is possible here based on the zoning, the timing and extent of future development is dependent on flood hazard re-mapping and mitigation for Fourmile Canyon Creek. BHP has indicated an interest in potentially coordinating development of this site with redevelopment of Ponderosa mobile home park, which is currently privately owned and in Area II but also subject to flood hazard and at risk for failing infrastructure.

4. Civic Area: Both the East and West Ends of the Civic Area have been identified in the Civic Area Plan as possible locations for housing in combination with other uses. Work on this is proceeding as part of Civic Area Plan implementation.

Comprehensive Housing Strategy Timeline



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