Adjourned Meeting
April 28, 2020
6:00 p.m.

Public Participation for Council Meetings

Public Participation for this remote Council meeting will be available online or by phone. No one will be allowed to attend in person.

View Meeting Agenda

Watch the Meeting: Anyone can view the Council meeting live on Channels 14 and 881 or online at www.fcgov.com/fctv.

Public Participation (Online): Individuals who wish to address Council via remote public participation can do so through Zoom at https://tinyurl.com/cofccouncilmeeting04282020. The link and instructions will also be posted at www.fcgov.com/councilcomments. Individuals participating in the Zoom session should also watch the meeting through that site, and not via FCTV, due to the streaming delay and possible audio interference.

The meeting will be available beginning at 5:15 p.m. Tuesday. Participants wanting to ensure their equipment setup is working should join prior to 6:00 p.m. For public comments, the Mayor will ask participants to click the “Raise Hand” button to indicate you would like to speak at that time. Staff will moderate the Zoom session to ensure all participants have an opportunity to address Council.

In order to participate:

- Use a laptop, computer, or internet-enabled smartphone.
  - Please note that using earphones with a microphone will greatly improve your audio.

- You need to have access to the internet.
- Join the Zoom meeting by clicking on link above. The meeting room will open at 5:15 p.m.
- Keep yourself on muted status.
- DO NOT Watch/stream FCTV at the same time
Public Participation (Phone): If you do not have access to the internet, call the City Clerk’s office at (970) 221-6515 no later than 4:00 p.m. on the day of the meeting.

- Please indicate that you want to participate in public participation by phone and give your name and phone number. If you get a voicemail message, please leave the same information.
- Once you have given this information (in person or by message), a staff person will provide you with the phone number that will allow you access to the Zoom meeting.

As listed above, the meeting will be available beginning at 5:15 p.m. Please call in to the meeting prior to 6:00 p.m., if possible. For public comments the Mayor will ask participants to indicate if you would like to speak at that time – phone participants will need to hit *9 to do this. Staff will be moderating the Zoom session to ensure all participants have an opportunity to address Council. Once you join the meeting:

- DO NOT Watch/stream FCTV at the same time

Documents to Share: If residents wish to speak to a document or presentation, the City Clerk needs to be emailed those materials by 4 p.m. the day of the meeting.

Individuals not comfortable or able to access the Zoom platform or able to participate by phone are encouraged to participate by emailing general public comments you may have to CityLeaders@fcgov.com. If you have specific comments on any of the discussion items scheduled, please make that clear in the subject line of the email and send prior to the meeting Tuesday evening.

Note: Only individuals who wish to address Council should use the Zoom link or call in by phone. Anyone who wants to watch the meeting, but not address Council, should view the FCTV livestream.

Persons wishing to display presentation materials using the City’s display equipment under the Citizen Participation portion of a meeting or during discussion of any Council item must provide any such materials to the City Clerk in a form or format readily usable on the City’s display technology no later than two (2) hours prior to the beginning of the meeting at which the materials are to be presented.

NOTE: All presentation materials for appeals, addition of permitted use applications or protests related to election matters must be provided to the City Clerk no later than noon on the day of the meeting at which the item will be considered. See Council Rules of Conduct in Meetings for details.

The City of Fort Collins will make reasonable accommodations for access to City services, programs, and activities and will make special communication arrangements for persons with disabilities. Please call 221-6515 (V/TDD: Dial 711 for Relay Colorado) for assistance.

- CALL MEETING TO ORDER
- ROLL CALL

1. Consideration of a motion to enter into executive session.

   “I move that the City Council go into executive session, as permitted under Article II Section Eleven (1) of the City Charter, Section 2-31(a)(1)a. of the City Code and Colorado Revised Statutes Section 24-6-402(4)(f)(l), for the purpose of evaluating and discussing finalists for the Chief Judge position.”

2. Resolution 2020-039 Authorizing Two Members of the City Council to Discuss with City Staff or the Named Finalist the Terms and Conditions of an Employment Agreement for the Chief Judge Position and Amending the Schedule Adopted in Resolution 2020-035 Regarding the Recruitment and Selection of a Chief Judge. (staff: Teresa Roche; 10 minute discussion)

   The purpose of this item is to authorize two members of the Council to discuss with City staff or the person named the terms and conditions of employment for the Chief Judge position and to amend the schedule adopted in Resolution 2020-035 regarding the recruitment and selection of a Chief Judge to allow the City Council, City staff, the executive recruiter and the identified candidate additional time, if needed, to negotiate an employment agreement.
Motion language to complete proposed resolution:

“I move that Council appoint __________________ and __________________ to review and discuss contract terms and conditions with ______________ [the selected finalist].”

- OTHER BUSINESS
- ADJOURNMENT
AGENDA ITEM SUMMARY                   April 28, 2020
City Council

STAFF
Teresa Roche, Chief Human Resources Officer
Jenny Lopez Filkins, Legal

SUBJECT
Resolution 2020-039 Authorizing Two Members of the City Council to Discuss with City Staff or the Named Finalist the Terms and Conditions of an Employment Agreement for the Chief Judge Position and Amending the Schedule Adopted in Resolution 2020-035 Regarding the Recruitment and Selection of a Chief Judge.

EXECUTIVE SUMMARY
The purpose of this item is to authorize two members of the Council to discuss with City staff or the person named the terms and conditions of employment for the Chief Judge position and to amend the schedule adopted in Resolution 2020-035 regarding the recruitment and selection of a Chief Judge to allow the City Council, City staff, the executive recruiter and the identified candidate additional time, if needed, to negotiate an employment agreement.

Motion language to complete proposed resolution:
“I move that Council appoint ______________ and __________________ to review and discuss contract terms and conditions with ______________ [the selected finalist]."

STAFF RECOMMENDATION
Not applicable.

BACKGROUND / DISCUSSION
The City began a recruitment and selection process for the Chief Judge position in January 2020 with the support of an executive recruitment firm Baker Tilly Virchow Krause, LLP. Council appointed an ad hoc committee of Council to, among other tasks, conduct interviews with the top candidates and narrow the field for interviews with full Council. Baker-Tilley presented possible top candidates’ resumes and credentials for consideration to the ad hoc committee. The ad hoc committee narrowed the field to three finalists after conducting interviews on April 20, 2020 and Council will interview those finalists on April 22, 2020. A possible executive session is set for April 28, 2020, for the purpose of Council discussing the finalists and a summary of information from several other interviews. No decision about the finalists will be made in the executive session.

This Resolution authorizes two members of Council to discuss with City staff or the named finalist the terms and conditions of an employment agreement. It also approves an amendment of the schedule previously adopted by Council to allow Council, City staff, the executive recruiter and identified candidate additional time, if needed, to negotiate an employment agreement.

ATTACHMENTS
1. Amended Timeline (redlined to show changes) (DOCX)
# Amended Exhibit A Chief Judge Recruitment
## Timeline and Milestones

*Dates reflect the City’s targeted timeline and are subject to change.*

<table>
<thead>
<tr>
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<td>Publicly announce finalists</td>
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**Bold indicates Council action**
RESOLUTION 2020-039
OF THE COUNCIL OF THE CITY OF FORT COLLINS
AUTHORIZING TWO MEMBERS OF THE COUNCIL TO DISCUSS WITH CITY STAFF OR THE NAMED FINALIST FOR THE CHIEF JUDGE POSITION THE TERMS AND CONDITIONS OF AN EMPLOYMENT AGREEMENT AND AMENDING THE SCHEDULE ADOPTED IN RESOLUTION 2020-035 REGARDING THE RECRUITMENT AND SELECTION OF A CHIEF JUDGE

WHEREAS, on October 18, 2019, Chief Judge Kathleen Lane notified the City Council of her intent to retire from her employment as Chief Judge effective July 3, 2020; and

WHEREAS, on December 3, 2019, the City Council adopted Resolution 2019-110 creating a Council Committee to serve as the ad hoc Chief Judge Selection Process Committee (“Committee”) and directing staff to develop a detailed plan and target schedule for the recruitment and selection of the Chief Judge to be considered by the Committee and presented to the City Council for approval; and

WHEREAS, on April 7, 2020, the City Council adopted Resolution 2020-035 approving an amended plan and schedule for the Chief Judge selection process and authorizing the Committee to narrow the field of candidates at a committee meeting on April 20, 2020; and

WHEREAS, on April 20, 2020, the Committee interviewed the top candidates and selected finalists for the Chief Judge position to be interviewed by the City Council; and

WHEREAS, on April 22, 2020, the City Council interviewed each finalist and later received a summary of information from numerous other finalist interviews including a public forum with the finalists.
NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF FORT COLLINS as follows:

Section 1. That the City Council hereby makes and adopts the determinations and findings contained in the recitals set forth above.

Section 2. That the City Council hereby approves the amended detailed plan and target schedule for the recruitment and selection of the Chief Judge as described on Exhibit “A” attached hereto.

Section 3. That the City Council hereby authorizes two members of the Council, to be appointed by separate motion, to discuss with City staff or the person named below the terms and conditions of an employment agreement for the Chief Judge position, with such agreement to be presented for City Council consideration on May 19, 2020:

_________________________________

Passed and adopted at an adjourned regular meeting of the Council of the City of Fort Collins this 28th day of April, A.D. 2020.

______________________________
Mayor

ATTEST:

______________________________
City Clerk
# Amended Exhibit A Chief Judge Recruitment

**Timeline and Milestones**

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*Bold indicates Council action*
City Council Work Session
April 28, 2020
After the Adjourned Council meeting, which begins at 6:00 p.m.

• CALL TO ORDER.

  1. **COVID-19 Social and Economic Recovery.** (staff: Clay Frickey, et al; 15 minute presentation; 45 minute discussion)

     The purpose of this item is to provide information about known COVID-19 impacts, summarize social and economic responses to date, summarize funding sources, outline principles to guide recovery, and seek feedback on proposals for dispersal of funding.

  2. **Manufactured Housing Zoning and Residents' Rights Update.** (staff: Ryan Mounce, et al; 15 minute presentation, 45 minute discussion)

     The purpose of this item is to discuss details and options for a new manufactured housing zone district and to provide an update on implementation of manufactured housing residents’ rights and livability strategies.

• ANNOUNCEMENTS.

• ADJOURNMENT.
SUBJECT FOR DISCUSSION


EXECUTIVE SUMMARY

The purpose of this item is to provide information about known COVID-19 impacts, summarize social and economic responses to date, summarize funding sources, outline principles to guide recovery, and seek feedback on proposals for dispersal of funding.

GENERAL DIRECTION SOUGHT AND SPECIFIC QUESTIONS TO BE ANSWERED

Do Councilmembers support staff's current approach to economic and social recovery?

BACKGROUND / DISCUSSION

Fort Collins and the global community have already experienced widespread human and economic impact caused by the Novel Coronavirus 2019 (COVID-19). This Work Session item includes the following for discussing these impacts:

- Landscape assessment of the global, national, and more local insights already learned.
- A brief overview of the response efforts to date by the City and our community.
- An initial set of guiding principles to direct a triple bottom line approach to recovery.

Landscape Assessment

As with any ongoing crisis, the full impacts to our community are still unknown. However, there are a series of insights staff can offer at this point:

Global, National, and Local Insights

- **Poverty:** According to a recent Oxfam report (www.oxfam.org), 6-8% of the global population (500 million people) could be pushed into poverty.
- **Unemployment:** Nationally, and as of April 11, unemployment claims are at $22 million, or about 18% of the U.S. work force. In Colorado, the state has already received 232,000 claims for unemployment (approximately 7% of the Colorado work force) and these claims are disparate by industry.
- **Health Impacts:** Inequities and health disparities were present prior to COVID-19, and these inequities are in stark relief now. For example, in Colorado, African Americans represent 3.9% of Colorado’s population but represent 7% of both cases of COVID-19 and associated deaths. A recent paper reviewed national data and projected that persons experiencing homelessness “infected with COVID-19 are twice as likely to be hospitalized, two to four times as likely to require critical care, and two to three times as likely to die from the illness as the general population.” (works.bepress.com/dennis_culhane/237/?mc_cid=ad1b3e3234&mc_eid=7847c2f8d7).
- **Consumer Concerns:** According to a recent analysis by McKinsey & Company (www.mckinsey.com), U.S. consumers top concerns in April are uncertainty around public health, the duration of the crisis, and economic impacts.
What We Know Today

The impact of COVID-19 will be far reaching with full extent of impacts unclear; however, the following impacts are already known:

- **The U.S. Economy**: The overall U.S. economy is now in recession and has been since March.
- **CARES Act**: Business support has already exhausted its funding.
- **Local business and service providers**: These entities are anticipating significant downside to their revenue. See more information below.
- **The City of Fort Collins**: The City entered the crisis from a strong financial position, but anticipated revenue losses will require the City to act to rebalance its 2020 budget and address impacts in the 2021 budget.

What Remains Unknown

The remaining aspects of the impact remain unclear, including:

- **Severity of decline**: How much downside the economy might experience in this recession.
- **Shape and length of recovery**:
  - Length: If the economy will rebound quickly or if recovery will be more protracted.
  - Shape: The recovery could be Structural or Cyclical. Structural decline would represent a steep decline and slow recovery that may fail to reach pre-crisis peak. Cyclical decline would result in a less pronounced decline followed by a recovery that would return to pre-crisis levels.
- **Full impact of federal aid (direct & indirect)**: Federal aid will continue to filter down to the community and impacts will not be evident for several months.
- **CARES 2.0**: The second phase of the CARES act could be an opportunity, but its contents and timing are unknown at this point.
- **Other lagging responses to COVID-19**: Businesses, municipalities, and community members continue to adapt to changing reality presented by COVID-19. Many businesses and municipalities are waiting to assess the full extent of COVID-19 impacts before implementing furloughs or laying off staff.

Survey Results

To better understand how the community is faring, two questionnaires were created:

1. A questionnaire sent to the business community (inclusive of nonprofits).
2. A questionnaire sent to existing nonprofit partners that the City funds through its human service funding.

Business Survey

Starting shortly after Governor Polis executed the Stay at Home order on March 25, 2020, the Northern Colorado Regional Economic Development Initiative (NoCo REDI) prepared questionnaire for distribution to businesses. The survey was open until April 16, 2020 and received over 650 responses from Larimer County. Economic health staff prepared a summary of the Fort Collins breakout available as Attachment 2.

The highlights of the survey include:

- 155 responses from Fort Collins businesses through April 16
- 40% of respondents have reduced employment or employee hours
- 53 responded they had lost more than $25,000 in revenue
- 37% of businesses stated the minimum amount which would be useful to them is over $25,000.

Initial Nonprofit Assessment

In the week of April 13, staff conducted an informal assessment to obtain a general idea about how existing nonprofit partners were responding to COVID-19 with programs and services and to better understand the financial impacts these nonprofits were experiencing and anticipating going forward. While staff is still processing
the twenty-three (23) responses received (out of 34 total partners), here is an initial summary of what was learned:

- **Revenue Loss (8):** The most significant impacts seen thus far mirror business impacts - anticipated revenue loss, with almost $300,000 in costs incurred already and an approximate $1.2 million in future funding gaps anticipated. Revenue loss has been experienced in the following ways:
  - Decreased fundraising: Nonprofits had to cancel major fundraising events that support year-round operational costs. For example, Teaching Tree shared they had two fundraisers originally scheduled this spring which would have raised up to $50,000 for their annual operations.
  - Increased costs of doing business: For some, like the Food Bank, implementing physical distancing has meant it takes more time to get their services to their customers, increasing operational costs. For others, like CASA (Court-appointed Special Advocate), the transition to virtual case-management and facilitating contact for custody exchange has increased the cost of business.
  - Overall loss of revenue: Particularly childcare services are anticipating large losses related to reduced services (smaller group sizes) and tuition losses.

- **Changing Service Delivery Methods (6):** As noted above, this largely included changes to how services or programming is provided.

- **Adding Programs in Direct Response to COVID-19 (5):** Agencies have added programs to meet emergency shelter, rent, and food needs. For example, the Food Bank started delivering food boxes to homebound seniors and Neighbor to Neighbor has expanded its rental assistance program by over 700% and added a full-time Spanish speaking counselor.

- **Increased Demand on Existing Services (4):** Nonprofits noted an increase in demand on existing services. For example, the Food Bank shared that they serve 9,000 meals in an average month and served over 14,000 per month in the last recession. They are anticipating a similar increase in service demand during this time and throughout recovery.

### Response to Date

To adapt to the rapidly changing environment presented by this crisis, the city has implemented a suite of tactics and programs to ensure community members and businesses are able to connect to available resources. Below is a brief summary of responses to date:

**Overall Efforts:**

In both areas, communications and coordination were prioritized to ensure that residents are aware of resources through mechanisms that are accessible to them, including:

- **Partnership with United Way of Larimer County:** City staff is working closely across departments and with community partners to coordinate and ensure the information included in the United Way resource lists is shared widely and is as comprehensive as possible. See memo in the April 16 Council Packet for more information on this partnership.

- **Larimer County Task Force:** The seven municipalities, chambers of commerce, and the county participate in a task force to coordinate responses to COVID-19 across jurisdictional boundaries.

- **Connect First:** We meet weekly with key community executives about how to collectively support outcomes for kids with a data informed approach, including Poudre School District, County, Bohemian Foundation, Early Childhood Council, and United Way of Larimer County.

- **Adopt a Neighbor:** Within five business days of the stay-at-home order, the city retooled and relaunched Adopt-a-Neighbor to ensure neighbors were able to support their neighbors directly during this time. As of today, we have 340 volunteers supporting 52 neighbors.

- **Bridging the Digital Divide:** Knowing that there is a significant need to reach residents without internet access, the city is beginning to bridge this gap in the following ways:
  - Connexion is following the same protocol as Utilities and will not disconnect services to customers for nonpayment until further notice. In addition, Connexion is working closely with Poudre School District to deploy wi-fi service to manufactured home communities; work began the week of April 13.
  - Staff is ensuring residents who need information most right now, including seniors and other susceptible populations, have access to resources by: (1) mapping these residents, and (2) directly delivering
information to their doors.

- **Translation of Materials:** To ensure information is accessible to our Spanish speaking families, staff has been working with community partners to translate each of the United Way resource lists into Spanish and share them with community members. Staff is also prioritizing other mechanisms to ensure materials are accessible, e.g., sign translations, the Town Hall for Spanish-Speaking Families hosted by Poudre Library that will be held on April 23, and more.

In addition to communications and coordination, staff is also supporting leadership to help inform State and Federal funding and policy as it is developed, e.g., what should be included in any potential CARES2 funding for local governments.

**Overview of Social Response Efforts**

**Housing:**
- The city has coordinated with partners to increase rental assistance opportunities through Neighbor to Neighbor.
- Staff is prioritizing the Community Development Block Grant (CDBG) COVID-19 funding coming to Fort Collins (more information on this resource below).
- Community response has been bolstered by the statewide eviction moratorium and specific mortgage assistance outlined in the CARES Act.
- The City Manager signed an emergency order on March 25 to allow for recreational vehicles (RVs) to be occupied on private property with permission from the property owner during this time, amongst other allowances.

**Homelessness:**
- The City and its partners established a centralized operations center at Northside Aztlan Community Center (Aztlan). This site serves as an overnight shelter for male guests.
- On April 10, the city converted Heritage Park to an outdoor shelter site for those experiencing homelessness with a designated camping area.
  - An exit strategy is underway which aligns with recommendations from the Larimer County Health Department and will return the site to a park once the stay-at-home order is lifted.
- The city is working with the Health District and Homeward Alliance to convert a City property on West Myrtle for use as an isolation site for people who are at higher risk for negative health outcomes related to COVID-19. This site is anticipated to serve 12-15 people starting the week of April 27.

**Equity:**

While equity and inclusion efforts will be discussed in more depth at the May 12 Work Session, equity is a key principle in the city’s approach to recovery and examples of work to date are highlighted below:

- **Just in Time Equity Lens** - This tool was developed by the newly formed Rapid Response Racial Equity Team to help embed equity and inclusion into our organizational COVID response and aligns with the city’s Strategic Objective to support “equity for all, leading with race.” Project managers are using the tool to help ensure they are designing efforts to help marginalized populations, especially communities of color, while elevating equitable outcomes for all residents.
- In addition, the City has formed a Vulnerable and Susceptible Populations Group to ensure coordination across departments, prioritizing service delivery mechanisms that meet the needs of all residents.

**Overview of Economic Response Efforts**

- **NoCoRecovers.com:** NoCoRecovers.com is a one-stop-shop for businesses to access resources to aid in their recovery from COVID-19 impacts. This website serves all of Northern Colorado and is supported by 19 economic development programs, including the city’s Economic Health Office.
- **Weekly Targeted Email:** The Economic Health Office sends a weekly e-mail to interested businesses with
links to helpful resources and status updates on programs to aid in their recovery.

- **Support Local Campaign**: In collaboration with the Fort Collins Chamber of Commerce, staff has developed a campaign to encourage community members to support local businesses. The campaign goes beyond just encouraging shopping at local retailers. The idea of the program is to encourage businesses to also support other local businesses, entrepreneurs, and non-profits.

- **Relief and Recovery Loan Fund**: This loan fund provides loans with favorable terms to businesses that are underserved by banks. The goal of the fund is to provide small businesses with working capital to retain employees and survive the economic downturn.

### COVID Response Funding Sources

There are multiple funding sources available to Fort Collins for COVID-19 response and recovery. To date, across the CARES funding and other federal/state agency mechanisms, the City has identified $8.4 million that flow directly to the city organization (via FTA and HUD) and another $17 million for the Northern Colorado Regional Airport. Staff continues to work with partners at all levels of government to determine the city’s allocations. Available funding for residents and businesses continues to evolve (is robust) and the amount the community receives is dependent on the federal aid packages made available and the number of organizations that apply for aid.

Federal and state funding resources are outlined in **Attachment 1**. In addition, multiple private funding sources are available to our community and region. Information about all funding sources (federal, state, private) is maintained in the [NoCoRecovers.com](https://nocorecovers.com/) web site, a one-stop-shop for up-to-date information on potential funding resources for the business community of Northern Colorado.

### Principles and Approaches to Recovery

Staff has developed an initial series of principles to guide our recovery. Staff will provide examples of the principles in action and recovery during the Work Session presentation.

- **Adaptability in the face of change and uncertainty**: As an organization, we will act nimbly and adapt current services to meet the needs of the community amidst rapid change.

- **Community focused, centered in equity and inclusion**: Staff will develop processes, programs and deliver community outcomes in a way that furthers our goals around equity and inclusion.

- **Policies and infrastructure integrate and maximize Triple Bottom Line benefits**: Economic, environmental, and social health all benefit from new policies and infrastructure as well as changes to existing policies and infrastructure.

- **Advance regeneration and resilience**: Staff’s response creates structures that regenerate the community and allow Fort Collins to be resilient in the face of future crises.

- **Capitalize on opportunities for improvement**: Use COVID-19 response as a way to improve processes that can apply beyond the recovery phase and become permanent changes to the way we do business.

- **Remove regulatory barriers**: Address existing regulatory barriers to allow the community to recover more quickly.

- **Apply lessons learned in response**: Create frameworks that allow Fort Collins to better manage future crises and community disruptions.

- **Align, collaborate, and innovate with partners**: Collaborative systems will help our partners better navigate current and future crises while developing stronger bonds that will help the community recover together.

It is anticipated these principles will evolve into a framework for recovery in the coming months.

### Phases of Recovery

Our path to recovery will not likely follow a straight line. To acknowledge this, staff proposes adopting a tiered approach to recovery that allows the city to quickly adapt its response to the changing needs of the community. The tiered approach follows a similar structure for the city’s structure for emergency management and the state’s phases of recovery. The phases of recovery include:
• **Response**: Address immediate community needs and minimize further spread of COVID-19.
• **Emergence**: Open portions of economy back up with restrictions. Gradually phase in activities provided new cases of COVID-19 flatline or drop.
• **Recovery**: Relax most restrictions and begin to return to standard business practices.

**NEXT STEPS**

• CDBG-CV Funding Appropriation and Resolution Proposed Timeline
• May 12 - Equity and Inclusion Work Session
• Developing internal metrics dashboard
• Continue to research promising practices
• Form Triple Bottom Line (TBL) Community Recovery Advisory Committee

**ATTACHMENTS**

1. Memo on Federal and State funding sources (PDF)
2. Business Survey Results Summary (PDF)
3. Economic Social Recovery COVID WS Apr28 (PDF)
MEMORANDUM

DATE: April 9, 2020

TO: Mayor and City Councilmembers

FROM: Darin Atteberry, City Manager

RE: COVID-19 Funding Sources Available to Fort Collins

Attached is a memorandum to City Council that serves as an important reference for Council and our community regarding federal and state resources available to support Fort Collins’ recovery from the COVID-19 pandemic. As you know, our City organization is deeply committed to researching resources and providing that information to our community that is clear, timely, and easily accessible.

We are in a dynamic environment in many ways, and information and guidelines on funding sources will continue to evolve. Information contained in this memo provides the best information we have today, but we anticipate things to evolve, and will share this information with Council and our community in a timely way.

My intent is to discuss these funding opportunities with the Council Finance Committee on April 20 and then with the full City Council on April 28 in a work session on Social and Economic Recovery in Fort Collins.

I am pleased and appreciative of the work to date to compile these resources, and to assess the needs in our community as we begin our work to disperse the funds. I also continue to refer community members to these City websites for additional information.

COVID19 Resources
For all residents: https://www.fcgov.com/eps/coronavirus
For businesses: https://www.fcgov.com/business/
Want to help: https://www.fcgov.com/volunteer/
Connect with resources: https://uwaylc.org/

RECURSOS COVID-19
Para integrantes de la comunidad: https://www.fcgov.com/eps/coronavirus
Para empresas: https://www.fcgov.com/business/
¿Quieres ayudar o necesitas ayuda? https://www.fcgov.com/neighborhoodservices/adopt
Recursos de United Way: https://uwaylc.org/
MEMORANDUM

DATE: April 9, 2020
TO: Mayor and City Councilmembers
THRU: Darin Atteberry, City Manager
      Jeff Mihelich, Deputy City Manager
FROM: Travis Storin, Interim Chief Financial Officer
      Jacqueline Kozak Thiel, Chief Sustainability Officer
      Caryn Champine, Planning, Development and Transportation Director
RE: Summary of Federal and State COVID-19 Funding Sources Available to Fort Collins

Purpose:
To provide a summary of known Federal and State funding opportunities to support Fort Collins in response to and recovery from the COVID-19 pandemic.

Bottom Line:
There are multiple funding sources available to Fort Collins for COVID-19 response and recovery. Thus far, across the CARES funding and other federal/state agency mechanisms, the City has identified $8.4M that flow directly to the City organization (via FTA and HUD). An as-of-yet indeterminate amount of additional federal pass-through funding is available to the City organization and staff is working with partners at all levels of government to determine the City's allocations. Available funding for residents and businesses is robust and the amount the community receives is dependent on the number of organizations that apply for aid. Staff continues to research additional opportunities and will inform Council as any are identified.

I. Overview of Federal Funding Sources

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES) was signed into law. The $2.2 trillion package includes a wide range of provisions that provide funding for issues ranging from emergency relief to unemployment benefit expansion. Target recipients for each item are in parentheses. For ease, each of the major aspects of the CARES Act are described individually below and in more detail in Attachment 1.

**CARES Act: Payroll Protection Program (PPP) (Small businesses)**
- $350 billion to help small businesses keep workers employed
- Provides 100% federally guaranteed loans to small businesses that maintain their payroll during this emergency.
- The loans may be forgiven if borrowers maintain their payrolls during the crisis or restore their payrolls afterward.

**CARES Act: Economic Injury Disaster Loan Emergency Advance (EIDL) (Small businesses)**
- Small business can apply for an advance of up to $10,000 if experiencing a temporary loss of revenue. This advance will not have to be repaid.
CARES Act: Small Business Administration (SBA) Express Bridge Loans (Small businesses)
- For small businesses who currently have a business relationship with an SBA Express Lender to access up to $25,000.

CARES Act: Small Business Administration (SBA) Debt Relief (Small businesses)
- SBA will automatically pay the principal, interest, and fees of certain small business loans a period of six months. The SBA will also automatically pay the principal, interest, and fees of new 7(a), 504, and microloans issued prior to September 27, 2020.

CARES Act: Expanded Unemployment Benefits (Anyone experiencing a loss of hours, temporary unemployment, or loss of job)
- Provides for (1) an extra $600 weekly payment, in addition to the weekly benefit amount an eligible employee otherwise receives under state law; and (2) increases the maximum number of weeks an individual may receive benefits. These new benefits are funded at the federal level but will be administered by the states.

CARES Act: Community Development Block Grant (CDBG) Allocation (Residents and Businesses and local government)
- The Director of the Denver Regional Field Office of the Department of Housing and Urban Development (HUD) notified the City of its additional CDBG funding allocation of $649,203 under the CARES Act to support the immediate response needs.
- This CARES Act guidance encouraged the City to consider approaches that prioritize the unique needs of low- and moderate-income persons and the development of partnerships between all levels of government and the private for-profit and non-profit sectors.
- Process guidance still pending.
- Staff is working with a multidisciplinary team to identify priority needs and gaps based on local non-profit outreach and the preliminary guidance on using CDBG funding. The team will seek Council review of an anticipated deployment plan. Note funding allocations are approved by City Council, and a timeline for appropriation will be included in the deployment plan.

CARES Act: Department of Justice Coronavirus Emergency Supplemental Funding (CESF) (City Government)
- Funds are awarded under the CESF Program to prevent, prepare for, and respond to the coronavirus. Allowable projects and purchases include law enforcement and certain medical needs.
- The City would be eligible for a grant up to $100,818 with no local match and intends to apply.
- The application is due by May 29, 2020, and if awarded the City would have two years to draw down the eligible funds for reimbursement.

CARES Act: Election Assistance Commission (EAC) (State and Local Governments)
- This funding provides $400 million for Election Security Grants, which will be provided to States and local jurisdictions in order to manage their role in the 2020 election cycle.
- EAC Commissioners and staff are moving as quickly as possible to provide guidance on how these funds will be distributed.
- Staff intends to apply.
Federal Emergency Management Agency (FEMA) (State and Local Governments)

- On March 28, 2020 President Trump approved the major disaster declaration for the State of Colorado, making Federal funding available to state, tribal and eligible local governments and certain private nonprofits, on a cost-sharing basis for expenses such as Emergency Operation Center costs, related trainings, cleaning, some Personal Protective Equipment, related communications and certain other related expenses.
- Staff is tracking expenses for reimbursement.
- FEMA reimbursement of costs will not exceed 75%, so the City is responsible for 25% of eligible costs
- FEMA will not duplicate assistance provided by other federal agencies

Federal Transit Administration (FTA) (State and Local Governments)

- Transfort will net $8,719,626 in CARES funding from the FTA
- Funds can cover all operating activities that occur on or after January 20, 2020 including fixed route operating expenses; and operation and maintenance of Transfort’s fleets and facilities

II. Overview of State Funding Sources

Colorado COVID Relief Fund (Business, Nonprofits, governments)

- Funds raised will be used to support the needs of communities impacted by COVID-19 in three categories: prevention, impact, and recovery efforts.
- Organizations across Colorado, including local governments, may receive a general operating grant of up to $25,000 and City staff will apply as eligible
- For more information see https://covrn.com/covid-relief-fund/

Colorado Department of Local Affairs (DOLA) Emergency Disaster Fund

- $3 million from Disaster Emergency Fund allocated to DOLA for emergency rent and mortgage assistance for Coloradans facing economic disruption due to COVID-19
- DOLA is coordinating with local nonprofit housing counseling agencies and housing authorities, including Neighbor to Neighbor & Housing Catalyst. No allocation plans yet announced.

III. Additional Funding Sources

In addition to federal and state resources to support communities in this time, private foundations and community foundations are also providing grant support throughout Colorado. The organization Philanthropy Colorado is maintaining a comprehensive list, which can be found here: https://www.philanthropycolorado.org/news/resources-covid-19-coronavirus. Additional high level information regarding private funding sources will be provided at the April 28 Work Session.

Next Steps:

- Discussion planned with City Council Finance Committee on 4/20/20 regarding COVID-19 funding
- April 28 Work Session planned on Social and Economic Recovery with further updated information about these funds and how they can support recovery in our community
Attachments

Attachment 1 - Federal and State Funding Source to Support Fort Collins COVID-19 Response and Recovery

Attachment 2 – Fort Collins COVID-19 Community Development Block Grant Award Letter

CC: Josh Birks, Economic Health Director; Lindsay Ex, Sr. Environmental Program Manager; Drew Brooks, Transit Director; Kaley Zeisel, Compliance Manager; Blaine Dunn, Interim Accounting Director
I. Federal Funding Sources

CARES Act: Payroll Protection Program (PPP)
The CARES Act allocated $350 billion to help small businesses keep workers employed amid the pandemic and economic downturn. Known as the Payroll Protection Program (PPP), the initiative provides 100% federally guaranteed loans to small businesses that maintain their payroll during this emergency. Importantly, these loans may be forgiven if borrowers maintain their payrolls during the crisis or restore their payrolls afterward.

Eligibility/Process:
- 100% federally guaranteed loans made by SBA-approved lenders direct to eligible small businesses, including charitable non-profits, Veterans organizations, Tribal concerns, sole proprietorships, self-employed individuals, and independent contractors, with 500 or fewer employees.
- An individual business can apply for the funds through any existing SBA lender or through any federally insured depository institution, federally insured credit union, and Farm Credit System institution that is participating. Other regulated lenders will be available to make these loans once they are approved and enrolled in the program.
- Starting April 3, 2020, small businesses and sole proprietorships can apply for and receive loans to cover their payroll and other certain expenses through existing SBA lenders.
- Starting April 10, 2020, independent contractors and self-employed individuals can apply for and receive loans to cover their payroll and other certain expenses through existing SBA lenders.

Other relevant context:
- The loan amounts will be forgiven as long as: (a) The loan proceeds are used to cover payroll costs, and most mortgage interest, rent, and utility costs over the 8 week period after the loan is made; and (b) Employee and compensation levels are maintained.

CARES Act: Economic Injury Disaster Loan Emergency Advance (EIDL)
The CARES Act authorized an Emergency Advance on Economic Injury Disaster Loans (EIDL) enabling small business owners in all U.S. states, Washington D.C., and territories to apply for an advance of up to $10,000. This advance will provide economic relief to businesses that are currently experiencing a temporary loss of revenue. Funds will be made available following a successful application. This advance will not have to be repaid.

Eligibility/Process:
- Direct advance of funds to an approved small business.
- An individual business must apply for an Economic Injury Disaster Loan (EIDL) and request an Emergency Advance. The application is available directly from the Small Business Administration (SBA) on their website.
- SBA is currently taking applications.
CARES Act: Small Business Administration (SBA) Express Bridge Loans
The Express Bridge Loan Pilot Program allows small businesses who currently have a business relationship with an SBA Express Lender to access up to $25,000. These loans can provide vital economic support to small businesses to help overcome the temporary loss of revenue they are experiencing and can be a term loan or used to bridge the gap while applying for a direct SBA Economic Injury Disaster Loan. If a small business has an urgent need for cash while waiting for decision and disbursement on an Economic Injury Disaster Loan, they may qualify for an SBA Express Disaster Bridge Loan.

Eligibility/Process
- Loans eligible to businesses with an existing SBA Express Lender relationship for up to $25,000 to be repaid from the proceeds of an EIDL loan.
- An individual business must apply for an Economic Injury Disaster Loan (EIDL) and request an Emergency Advance. The application is available directly from the Small Business Administration (SBA) on their website.
- SBA is currently taking applications.

CARES Act: Small Business Administration (SBA) Debt Relief
The SBA is providing a financial reprieve to small businesses during the COVID-19 pandemic. The SBA will automatically pay the principal, interest, and fees of current 7(a), 504, and microloans for a period of six months. The SBA will also automatically pay the principal, interest, and fees of new 7(a), 504, and microloans issued prior to September 27, 2020.

Eligibility/Process:
- Provides debt relief including paying principal, interest, and fees.
- No application necessary based on status and eligibility of the loan.
- Currently available.

CARES Act: Expanded Unemployment Benefits
The CARES Act includes various provisions increasing and expanding unemployment insurance benefits available to workers, including individuals who are unemployed, partially unemployed, or unable to work due to COVID-19.

Eligibility/process:
- Provides for (1) an extra $600 weekly payment, in addition to the weekly benefit amount an eligible employee otherwise receives under state law; and (2) increases the maximum number of weeks an individual may receive benefits. These new benefits are funded at the federal level, but will be administered by the states.
- As normal through the State of Colorado Department of Labor and Employment – the state’s processor of unemployment benefits.
- As of April 7, 2020, the coloradooui.gov website indicates it is not ready to accept and process claims for individuals experiencing a loss of hours or employment due to COVID19.

CARES Act: Community Development Block Grant (CDBG) Allocation
On April 3rd, the Director of the Denver Regional Field Office of the Department of Housing and Urban Development (HUD) notified the City of its additional CDBG funding allocation of $649,203 under the CAREs Act.

Eligibility/process
- HUD has stated all funding can be used for immediate response needs.
- This CARES Act guidance encouraged the City to consider approaches that prioritize the unique needs of low- and moderate-income persons and the development of partnerships between all levels of government and the private for-profit and non-profit sectors.
• Process guidance is still pending.
• In the meantime, staff is working with an interdisciplinary team to identify priority needs and gaps based on the preliminary guidance on using CDBG funding for infectious disease response.
• This allocation is directly to Fort Collins and does not require a formal application, but will require a submission of an amendment to the FY2019 Annual Action Plan and approval from HUD prior to the release of funds
• Once we receive the formal guidance from HUD, we will update Council on an anticipated deployment plan, including a proposed timeline for the Appropriation Ordinance for City Council’s review which comes with all HUD funding recommendations.

Other relevant context:
• The $649,203 allocation is associated with the first wave of funding ($2B out of a total of $5B included in the CARES Act). The remaining $3B in funding will be allocated as follows: (a) $1B directly to States and (b) $2B (retained) to be released based on need as determined by the Secretary. Staff is actively monitoring these resources for opportunities to address Fort Collins’ needs.

CARES Act: Department of Justice Coronavirus Emergency Supplemental Funding (CESF)
Funds awarded under the CESF Program must be utilized to prevent, prepare for, and respond to the coronavirus. Allowable projects and purchases include, but are not limited to, overtime, equipment (including law enforcement and medical personal protective equipment), hiring, supplies (such as gloves, masks, sanitizer), training, travel expenses (particularly related to the distribution of resources to the most impacted areas), and addressing the medical needs of inmates in state, local, and tribal prisons, jails, and detention centers. These funds would be able to be used City-wide and not just for the Police Department.

Eligibility/process:
• The City would be eligible for a grant up to $100,818 and this grant does not require a local match and the City intends to apply.
• The application is due by May 29, 2020, and will use the standard Federal Assistance Form.
• If awarded the City would have two years to draw down the eligible funds for reimbursement.

CARES Act: Election Assistance Commission (EAC)
This funding provides $400 million for Election Security Grants, which will be provided to states and local jurisdictions in order to manage their role in the 2020 election cycle.

Eligibility/process:
• EAC Commissioners and staff are moving as quickly as possible to provide guidance on how these funds will be distributed.
• Staff intends to apply as eligible.

Federal Transit Administration (FTA)
FTA is allocating $25 billion in CARES funding to recipients of urbanized area and rural area formula funds. These funds are being dispersed to transit agencies based on their 2020 formula funding apportionments.

Eligibility/Process:
• Transfort will receive a net of $8,719,626 in CARES funding by the FTA. These funds are available at a 100% federal match, there is no local match requirement.
• Funding through the CARES Act are available for all operating activities that occur on or after January 20, 2020 that are eligible. Funds are available until expended, there is no lapse date to obligate funds available under the CARES Act. Eligible expenses include:
  o Fixed route operating expenses;
  o Some or all of paratransit operating expenses;
  o Operation and maintenance of Transfort’s fleets and facilities;
  o Administrative leave;
  o Some capital and planning projects are also eligible.
• Transfort will execute the contract to use these funds through FTA’s existing online portal, the Transit Award Management System (TrAMS).
• Transfort will begin the process of contracting for CARES funds immediately; however, the process of executing an agreement in TrAMS takes approximately 4-6 weeks. At that time, Transfort will be able to begin submitting for reimbursements.

Other relevant context:
• The City of Fort Collins, as designated recipient of the Fort Collins-Loveland-Berthoud Transportation Management Area (TMA), is responsible for determining allocations of federal formula funding throughout the TMA. The TMA has been awarded a total of $12,787,733 in CARES funding for allocation among the four eligible transit agencies: Transfort, City of Loveland Transit (COLT), North Front Range Metropolitan Planning Organization (MPO) and Berthoud Area Transportation Services (BATS).

• COLT will receive $2,419,666 of this funding directly from FTA. For disbursements to the other two eligible agencies in the TMA, Transfort will facilitate a funding “exchange” whereby Transfort retains 100% of the federal funds as well as 38% of each agency’s allocation and will pay out the remainder (62%) of their allocations in local funds. Therefore, Transfort will receive a total of $10,368,067 in federal funds while paying $1,648,440 in local funds to MPO and BATS.

<table>
<thead>
<tr>
<th>CARES Act</th>
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<tbody>
<tr>
<td>FTA Apportionment Total</td>
</tr>
<tr>
<td>Loveland Federal Amount (as Direct Recipient)</td>
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<tr>
<td>Transfort Federal Amount</td>
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<tr>
<td>NFRMPO Allocation (Local Funds)</td>
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<tr>
<td>BATS Allocation (Local Funds)</td>
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<tr>
<td>Transfort Net (Federal – Local)</td>
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</table>

**Federal Emergency Management Agency (FEMA)**
On March 13, 2020 President Trump declared a national emergency related to COVID-19. On March 28, 2020 the President approved the major disaster declaration for the State of Colorado. By approving this declaration Federal funding is available to the state, tribal and eligible local governments and certain private nonprofit organizations on a cost-sharing basis for emergency protective measures (Category B), including direct federal assistance under Public Assistance, for all areas affected by COVID-19 at a federal cost share of 75 percent.

Eligibility/process:
• Under the emergency declaration FEMA may provide assistance and reimbursement for the following costs:
Management, control and reduction of immediate threats to public safety:
- Emergency Operation Center costs
- Training specific to declared event
- Disinfection of eligible public facilities in relation to COVID-19
- Purchase and distribution of food, water, ice, medicine, and other consumable supplies, to include personal protective equipment and hazardous material suits
- Movement of supplies and persons
- Security and law enforcement directly related to COVID-19
- Communication of general health and safety information to the public
- Reimbursement for local government force account overtime costs

Reimbursement is being handled through FEMA’s Public Assistance application process. Staff is currently working to set up a login for the City to be able to submit eligible costs for reimbursement. Staff will be able to submit costs on an ongoing basis while the City continues to respond to this disaster.

Once costs are submitted to FEMA, the City and FEMA will review backup documentation to ensure all costs are eligible for reimbursement. Once costs are reviewed the City will sign and Grant application and receive funds.

Other relevant context:
- The types of funds available listed above is not an all inclusive list and staff continues to research and work with partners at the State and Federal level to identify other costs that may be reimbursable. FEMA will not duplicate assistance provided by other federal agencies, staff will work together closely to ensure we are not asking for funding for the same costs from multiple federal agencies. FEMA reimbursement of costs will not exceed 75%, so the City is responsible for 25% of eligible costs

II. State Funding Sources

Colorado COVID Relief Fund
Launched in mid-March by Governor Polis, funds raised will be used to support the needs of communities impacted by COVID-19 in both response and recovery. The fund will support work in three categories: prevention, impact, and recovery efforts. This will include things like medical and cleaning supplies, food services, early childhood education, small business support, behavioral health services, and more.

Eligibility/process:
- Organizations across Colorado, including local governments, may receive a general operating grant of up to $25,000.
- Online application available at https://covrn.com/covid-relief-fund/
- Organizations helping with the response to COVID-19 are now able to apply for funds.
- Rolling application deadlines every two weeks.
- City staff will apply as eligible

Other relevant context:
- Fund is hosted by the State of Colorado and Mile High United Way.
- Eligible Organizations: Nonprofit organizations, local government, school districts and small businesses who are: Serving areas of the state with limited nonprofit capacity; and/or Serving a community need resulting from the COVID-19 crisis.

Colorado Department of Local Affairs (DOLA) Emergency Disaster Fund
$3 million from the Disaster Emergency Fund were allocated to DOLA for emergency rent and mortgage assistance for Coloradans facing economic disruption due to COVID-19

Eligibility/Process:
- DOLA is contracting with statewide non-profit agencies & public housing authorities to administer
- Neighbor to Neighbor & Housing Catalyst are currently coordinating with DOLA – no allocation plans yet announced
- Timeframe for applying is unknown

Other relevant context:
- Multiple private entities across the state have issued guidance against evictions until after April 30
- Single family federally-backed mortgages can be deferred for up to 180 days
- For more information see:  https://drive.google.com/file/d/1mMCRLb6PxMPI680_THFn4nqLGAty1jq9/view
April 2, 2020

The Honorable Wade Troxell
Mayor of Fort Collins
P.O. Box 580
Fort Collins, CO 80522

Dear Mayor Troxell:

I am pleased to inform you of a special allocation to your jurisdiction of Community Development Block Grant funds to be used to prevent, prepare for, and respond to the coronavirus (COVID-19). This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, which was signed by President Trump on March 27, 2020, to respond to the growing effects of this historic public health crisis.

The CARES Act made available $5 billion in Community Development Block Grant Coronavirus (CDBG-CV) funds. Of this amount, the Department is immediately allocating $2 billion based on the fiscal year 2020 CDBG formula. The remaining $3 billion shall be allocated based on needs using best available data, in the following tranches: $1 billion shall be allocated to States and insular areas within 45 days of enactment of the Cares Act, and $2 billion shall be distributed to states and local governments at the discretion of the Secretary. Up to $10 million will be set aside for technical assistance. Given the immediate needs faced by our communities, the Department has announced the first allocation of funds. Your jurisdiction’s allocation is $649,203.

The CARES Act adds additional flexibility for both the CDBG-CV grant and, in some cases, for the annual FY2020 CDBG grants in these unprecedented times. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.

In addition, the CARES Act authorizes the Secretary to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and fiscal year 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

The Department is developing a notice that will further describes the CARES Act’s provisions, a Quick Guide to the CARES Act flexibilities and other provisions, and other resources to enable swift implementation of CDBG-CV grants. As these become available, they will be
posted on HUD’s website and distributed to grantees. The Department will also support grantees with technical assistance.

As you develop your plan for the use of these grant funds, we encourage you to consider approaches that prioritize the unique needs of low- and moderate-income persons and the development of partnerships between all levels of government and the private for-profit and non-profit sectors. You should coordinate with state and local health authorities before undertaking any activity to support state or local pandemic response. CDBG-CV grants will be subject to oversight, reporting, and requirements that each grantee have adequate procedures to prevent the duplication of benefits. HUD will provide guidance and technical assistance on DOB and regarding prevention of fraud, waste, and abuse and documenting the impact of this program for beneficiaries.

The Office of Community Planning and Development (CPD) is looking forward to working with you to successfully meet the urgent and complex challenges faced by our communities. If you or any member of your staff has questions, please contact your local CPD Field Office Director or CPDQuestionsAnswered@hud.gov.

Sincerely,

John Gibbs
Acting Assistant Secretary
for Community Planning and Development
U.S. Department of Housing and Urban Development
The Northern Colorado Business Retention and Expansion Partnership Regional Survey

April 28, 2020
As part of a group of organizations that work closely with businesses on a daily basis, the City of Fort Collins Economic Health Office joined our regional partners to send out a brief survey to understand the impacts of COVID-19 on local business.

All organizations including members of the Regional Economic Development Initiative (REDI) sent out the same business survey to their respective companies.
Businesses throughout Fort Collins and the region were e-mailed a business questionnaire. Which was also promoted through the City website and social media.

As of April 16\textsuperscript{th} (we are still receiving responses):

155 businesses in Fort Collins responded to the survey.

629 businesses in all of Larimer County responded.
18.7% of the survey respondents identified in the other category. The next highest categories of respondents were professional services at 15.5% and retail at 14.2%.
53.5% of respondents have made no layoffs or furloughs to their workforce.

40% of respondents have reduced employment or employee hours.
74% of businesses implemented both social distancing and increased sanitation practices.
Economic Impacts

Businesses are experiencing a variety of supply chain disruptions including:

- Parts distributors closed
- Inability to export to certain countries
- Taking longer to receive inventory
- Inability to get PPE for employees
Over 72% of survey respondents indicated a *grant* was the type of assistance they were looking for.

Almost 37% of businesses stated the minimum amount which would be useful to them is *over $25,000*. 
Over 65% of businesses stated the have or will apply for an SBA Economic Injury Loan.

Over 51% of survey respondents indicated they have never interacted with the SBA.
Region-wide Data
Larimer County - Industry Breakout

Response by Industry Category

<table>
<thead>
<tr>
<th>Industry Category</th>
<th>Fort Collins</th>
<th>All of Larimer (including Fort Collins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other</td>
<td>133</td>
<td>18.7%</td>
</tr>
<tr>
<td>Retail</td>
<td>78</td>
<td>14.2%</td>
</tr>
<tr>
<td>Professional Services</td>
<td>71</td>
<td>15.5%</td>
</tr>
<tr>
<td>Restaurant/Bar</td>
<td>63</td>
<td>12.3%</td>
</tr>
<tr>
<td>Hotel/Hospitality</td>
<td>57</td>
<td>1.3%</td>
</tr>
<tr>
<td>Health and Wellness</td>
<td>53</td>
<td>57.3%</td>
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<tr>
<td>Manufacturing</td>
<td>44</td>
<td>44.4%</td>
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<tr>
<td>Business Professional</td>
<td>38</td>
<td>38.2%</td>
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<tr>
<td>Service</td>
<td>28</td>
<td>28.2%</td>
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<tr>
<td>Personal Care Service</td>
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<td>25.2%</td>
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<tr>
<td>Nonprofit</td>
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<td>11.3%</td>
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<tr>
<td>Fine and Performing Arts</td>
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<td>10.0%</td>
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<tr>
<td>Financial Banking</td>
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<tr>
<td>High Tech</td>
<td>7</td>
<td>7.0%</td>
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<tr>
<td>Media Production/Distribution</td>
<td>2</td>
<td>2.0%</td>
</tr>
<tr>
<td>Energy Industry</td>
<td>2</td>
<td>2.0%</td>
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</table>

Packet Pg. 31
Larimer County - Changes in Employment

### Employment Changes Implemented

<table>
<thead>
<tr>
<th>Change Type</th>
<th>Fort Collins</th>
<th>All of Larimer (including Fort Collins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Changes</td>
<td>34.8%</td>
<td>35.6%</td>
</tr>
<tr>
<td>Reduced Employment or Employee Hours</td>
<td>29.0%</td>
<td>37.7%</td>
</tr>
<tr>
<td>Layoffs</td>
<td>24.2%</td>
<td>24.2%</td>
</tr>
<tr>
<td>Increased Employment</td>
<td>2.5%</td>
<td>2.5%</td>
</tr>
</tbody>
</table>

### Laid-off/Furloughed

<table>
<thead>
<tr>
<th>Percentage Range</th>
<th>Fort Collins</th>
<th>All of Larimer (including Fort Collins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>53.5%</td>
<td>57.4%</td>
</tr>
<tr>
<td>1-10%</td>
<td>8.4%</td>
<td>5.9%</td>
</tr>
<tr>
<td>11-30%</td>
<td>3.2%</td>
<td>3.3%</td>
</tr>
<tr>
<td>31-50%</td>
<td>5.2%</td>
<td>5.7%</td>
</tr>
<tr>
<td>More than 50%</td>
<td>29.7%</td>
<td>27.7%</td>
</tr>
</tbody>
</table>

### % of total workforce businesses that have laid off or furloughed employees since 3/1/2020

- None: 57.4%
- 1-10%: 5.9%
- 11-30%: 3.3%
- 31-50%: 5.7%
- More than 50%: 27.7%
71% of businesses implemented increased sanitation practices
67% implemented social distancing
Larimer County - Economic Impacts

Estimated Loss of Revenue in Last 30 Days

- $1 - $2,500: 65
- $2,500 - $5,000: 82
- $5,000 - $10,000: 102
- $10,000 - $25,000: 113
- $25,000+: 170
- Undetermined: 73
Larimer County - Business Assistance

### Most Impactful Type of Assistance for Continuity of Operations in the next 30 to 60 Days

<table>
<thead>
<tr>
<th>Assistance Type</th>
<th>Fort Collins</th>
<th>All of Larimer (including Fort Collins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grants</td>
<td>508</td>
<td>11.0%</td>
</tr>
<tr>
<td>Loan</td>
<td>297</td>
<td>10.5%</td>
</tr>
<tr>
<td>Employee Resources</td>
<td>169</td>
<td>17.8%</td>
</tr>
<tr>
<td>General Information</td>
<td>164</td>
<td>19.4%</td>
</tr>
<tr>
<td>Other</td>
<td>69</td>
<td>28.5%</td>
</tr>
</tbody>
</table>

### Minimum Loan/Grant Amount that Would be Useful

<table>
<thead>
<tr>
<th>Financing Amount Needed</th>
<th>Fort Collins</th>
<th>All of Larimer (including Fort Collins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0-$2,500</td>
<td>7.1%</td>
<td>11.0%</td>
</tr>
<tr>
<td>$2,500-$5,000</td>
<td>9.0%</td>
<td>10.5%</td>
</tr>
<tr>
<td>$5,000-$10,000</td>
<td>16.1%</td>
<td>17.8%</td>
</tr>
<tr>
<td>$10,000-$25,000</td>
<td>18.1%</td>
<td>19.4%</td>
</tr>
<tr>
<td>$25,000 +</td>
<td>36.8%</td>
<td>28.5%</td>
</tr>
<tr>
<td>Undetermined</td>
<td>12.9%</td>
<td>12.9%</td>
</tr>
</tbody>
</table>
Over 63% of businesses stated they have or will apply for an SBA Economic Injury Loan.

Over 54% of survey respondents indicated they have never interacted with the SBA.
Historical Fort Collins Data
Job Growth in Fort Collins MSA 2010-2019

Top Growth Industries by %
1) Management of Companies and Enterprises
2) Mining, Quarrying, and Oil and Gas Extraction
3) Wholesale Trade
4) Educational Services
5) Construction

Top Growth Industries by # Jobs
1) Accommodation and Food Services
2) Construction
3) Manufacturing
4) Retail Trade
5) Professional, Scientific, and Technical Services
Fort Collins' unemployment rate continues to be lower than U.S. averages.

<table>
<thead>
<tr>
<th></th>
<th>1Q2019</th>
<th>2Q2019</th>
<th>3Q2019</th>
<th>4Q2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S.</td>
<td>3.9%</td>
<td>3.6%</td>
<td>3.6%</td>
<td>3.5%</td>
</tr>
<tr>
<td>Colorado</td>
<td>3.6%</td>
<td>3.2%</td>
<td>2.6%</td>
<td>2.4%</td>
</tr>
<tr>
<td>Fort Collins</td>
<td>3.0%</td>
<td>2.3%</td>
<td>2.1%</td>
<td>2.0%</td>
</tr>
</tbody>
</table>
Occupations in Fort Collins

- These occupations are projected to increase by 9.7% from 2019-2024, outpacing the national projected growth rate of 6.4%.

- **Life, Physical and Social Science**
  1) Conservation Scientists
  2) Medical Scientists
  3) Chemists

- **Architecture and Engineering**
  1) Civil Engineers
  2) Mechanical Engineers
  3) Industrial Engineering Technicians

- **Computer and Mathematical**
  1) Software Developers, Applications
  2) All Other Occupations
  3) Computer User Support Specialists
Median Household Income in Fort Collins

2010-2018:
1.95% average annual growth rate
1. Do Councilmembers support staff's current approach to economic and social recovery?
Strategic Alignment

Council Priorities
- Equity and Inclusion

Strategic Objectives

NLSH 1.2 Collaborate…to address poverty issues and other identified high-priority human service needs…
ECON 3.3 Engage the business community
## Landscape Assessment

### Global
- 6-8% of world’s population could be pushed into poverty (Oxfam)

### National / Statewide
- National Unemployment\(^1\) - Claims at 22 million ~ 18%; Colorado\(^2\) - 232,000 Claims ~ 7% (disparate by industry)
- Health disparities exacerbated – communities of color, homeless

### What We Know:
- Now in recession (March forward)
- CARES Act Business Support out of $
- Local service providers anticipating significant losses
- City started from a position of strength
- City must rebalance 2020 budget; 2021 budget will be impacted

### What We Don’t:
- Severity of decline
- Shape/length of recovery
- Full impact of federal aid (direct & indirect)
- CARES 2.0
- Structural vs. cyclical

---

1. U.S. Department of Labor, Initial Claims, Week ending April 11, 2020 and four preceding weeks;
2. Colorado Department of Labor and Employment, Initial Claims, Week ending April 4, 2020 and four preceding weeks
Nonprofit Assessment Results

Total estimated impact to existing partner nonprofits:

- ~$296K additional unreimbursed or unfunded costs to date
- ~$1.2M in future funding gaps (includes increased services & funding losses)

23 responses between April 12th and April 15th (Initial Summary in Packet)
Overview of Social Response

• Communications and coordination
  • Partnership with UWLC
  • Connect First
  • Adopt a Neighbor
  • Larimer County Task Force

• Housing
  • Rental assistance
  • CDBG Funding
  • RV exemptions

• Homelessness
  • Northside Atzlan, Heritage Park
  • W Myrtle Site

• Equity
  • Just in Time Equity Lens
  • Translation of Materials
  • Vulnerable and Susceptible Populations Working Group
Business Survey Results

Business Response:

- Changes recently made to the business (Multiple Selections Allowed)
  - Updating social distancing policies
  - Updating employee leave policies
  - Increased sanitation practices
  - Increased measures to ensure social distancing
  - Allowing employees to work from home
  - Added curbside/delivery or modified business offerings
  - (Other)

Workforce Impact:

- % total workforce laid off or furloughed since 03/01/2020:
  - 1-10%
  - 11-30%
  - 31-50%
  - More than 50%
  - None

155 responses between March 25th and April 13th (Detailed Summary in Packet)
Overview of Economic Response

- Communications and Coordination
  - NoCoRecovers.com
  - Weekly Targeted Email
  - Support Local Campaign

- Business Assistance
  - Consultation
  - Federal Program Guidance

- Sales Tax Deferral
  - Target $2,000 per month
  - 60-day deferral

- Small Business Relief and Recovery Loan Fund
  - First $110,000 available now
  - Working on a County-wide program
  - Target underrepresented business owners
COVID Response Funding Sources

Federal CARES Act*

Small Businesses
- Payroll Protection Program
- Economic Injury Disaster Loan Emergency Advance (EIDL)
- SBA Express Bridge Loans
- SBA Debt Relief

Individuals (Job loss/loss of hours)
- Expanded unemployment benefits
- Stimulus checks
- Mortgage assistance

Government
- State and Local Governments
  - Election Assistance Commission
- City Governments
  - Coronavirus Emergency Supplemental Funding (CESF)

Other Sources
- Federal
  - FEMA
  - FTA
  - FAA
- State
  - Colorado COVID Relief Fund
    (Business, Nonprofit, Government)
  - DOLA Emergency Disaster Fund
    (Rent Assistance)
- Private Sources

*Many funding sources contained within CARES Act
Potential Direction of Federal Funds

CDBG ($649K) – Propose prioritizing eligible costs not covered by other sources
- City incurred sheltering & response costs
- Other shelter operation costs
- Emergency assistance for rent, food & utilities
- Other non-profit eligible direct program & response costs

FTA ($8.7M)
- Fixed route operating expenses
- Some or all of paratransit operating expenses
- Operation and maintenance of Transfort’s fleets and facilities
- Administrative leave

FAA (~$17M)
- Directed at terminal, hangers, and other capital improvements
• Unprecedented
  • Crisis vs. Downturn
  • Unlike previous recessions
  • Dynamic Environment

Potential Curve has Three Segments:
  • Decline
  • Recovery
  • Stabilization

• Design Recovery in Levels (Nimble)
Phases of Recovery

- Tiered recovery
  - Tier 1 - Response
  - Tier 2 - Emergence
  - Tier 3 - Recovery
- Adapt response to current needs
  - Step up or down as needed
- Similar structure to other recovery plans
VS7  [@Clay Frickey] [@Josh Birks] Should we work in yesterday's new phrasing from the state of "Stay at Home" vs. "Safer at Home"?  
Victoria Shaw, 4/21/2020
Principles and Approaches to Recovery

- Adaptability in the face of change and uncertainty
- Community focused
  - Centered in equity and inclusion
- Policies & infrastructure integrate and maximize economic, environmental and social benefits
  - Advance regeneration and resilience
- Capitalize on opportunities for improvement
  - Remove regulatory barriers
  - Apply lessons learned in response
- Align, collaborate, and innovate with partners

Principles in Action: Response

- Emergency shelter at Northside
- NoCo Recovers website
- Adopt a Neighbor
- Emergency Operations Center
- Relief and Recovery Loan Fund

Principles in Action: Recovery

- Co-create recovery with community members
- Demonstration projects with partners
- Working conditions flexibility
Next Steps

• CDBG-CV Funding Appropriation and Resolution Proposed Timeline
  • May 5 & 19 – First & Second Reading of Appropriation Ordinance
  • (Tentative) June 2 - Resolution approving (1) Amended HUD Annual Action Plan & (2) funding recommendations (HUD required public meeting)

• May 12 – Equity and Inclusion Work Session
• Developing internal metrics dashboard
• Continue to research promising practices
• Form TBL Community Recovery Advisory Group
Response Roles

- Building on existing partnerships in early responses
- Data will continue to inform actions as we progress through recovery phases
- Opportunity to advance resilience in the face of unknowns
1. Do Councilmembers support staff's current approach to economic and social recovery?
SUBJECT FOR DISCUSSION

Manufactured Housing Zoning and Residents’ Rights Update.

EXECUTIVE SUMMARY

The purpose of this item is to discuss details and options for a new manufactured housing zone district and to provide an update on implementation of manufactured housing residents’ rights and livability strategies.

GENERAL DIRECTION SOUGHT AND SPECIFIC QUESTIONS TO BE ANSWERED

Manufactured Housing Zoning

1. Does Council prefer a zone district designed exclusively for manufactured housing preservation (Option A), or a broader zone district that also permits affordable housing options (Option B)?

2. What guidance does Council have on the proposed evaluation criteria for rezoning of existing manufactured housing communities to a new zone district?

Residents’ Rights and Livability Strategies

3. Does Council want to pursue mobile home community licensing as an option to address livability issues?

BACKGROUND / DISCUSSION

City Council has identified mobile home park preservation and resident protections as a priority and in August 2019 instituted a one-year moratorium on the City’s acceptance of any development application which would result in the closure or loss of capacity within existing mobile home parks.

In December 2019, staff provided an update at a Council Work Session that a new zoning district is one of the strongest local tools available to help preserve existing manufactured housing and introduced a number of new residents’ rights and livability strategies planned for implementation in 2020 (Attachment 1). As a follow-up, this 2020 work session item presents an update on final elements of the new manufactured housing zone district as well as additional information on manufactured housing licensing as a potential livability strategy.

Manufactured Housing Zone District

A new manufactured housing zone district is intended to preserve existing manufactured housing communities by limiting options for redevelopment into alternative land uses. While manufactured housing communities may close for any number of reasons, redevelopment can be a primary driver, especially for those parks located in zone districts which permit a wide variety and intensity of land uses, or for parks located in areas where redevelopment activity is occurring or anticipated.

Limiting alternative land uses may reduce overall redevelopment pressure and incentivize the continued operation of existing manufactured housing communities as the land use best able to generate long-term income for property owners. For both the residents and owners of manufactured housing communities, a manufactured housing zone district provides clear direction about the community’s long term desire to preserve this type of housing.
At the same time, there are different tensions and tradeoffs involved in creating a new zone district which strictly limits the availability of other permitted land uses, including:

- Preservation of a unique, limited, and affordable type of housing in the community
- The potential to perpetuate substandard infrastructure conditions
- Limiting a site’s contribution to a broader neighborhood or communitywide land use vision
- Impacts to property rights of existing owners

The final standards of a new zone district will ultimately influence these tradeoffs and staff's initial draft of zone district requirements and permitted land uses emphasizes the preservation of existing manufactured housing as a primary consideration. Additionally, because the zone district has been designed to preserve existing manufactured housing, the proposed standards are intended only for existing manufactured home development and would not necessarily apply to new development on vacant land.

The new zone district standards are also intended to be broadly applicable to a wide variety of existing development conditions while maintaining health, safety, and compatibility requirements. The act of rezoning a property to a new zone district does not trigger any retroactive requirements so long as the existing site complies with its original development approvals. Rather, the impact of the new standards only comes into enforcement if changes or redevelopment are proposed, or through the passive preservation of the site that results by limiting potential redevelopment to a smaller variety of land uses.

Details of the general zone district standards are described below, followed by two framework options for a different set of permitted land uses. Staff is seeking additional Council direction on the draft standards and the framework options prior to preparing a final package of Land Use Code changes.

**New Zone District: Definitions**

Prior to the implementation of a new zoning district, staff recommends updates to several Land Use Code definitions to modernize how manufactured housing and manufactured housing communities are described. The current draft definitions would include, or be similar to:

*Manufactured home* shall mean a preconstructed, transportable dwelling unit built on a permanent chassis and installed on a foundation system. The term manufactured home shall also include mobile homes, which are similar transportable dwelling units constructed prior to federal manufactured home standards adopted in 1976.

*Manufactured housing community* shall mean a parcel of land which has been planned, improved, or is currently used for the placement of five or more manufactured homes. Manufactured housing communities may also contain accessory uses intended primarily for the use and benefit of their residents, including but not limited to clubhouses, playgrounds and recreational amenities, childcare, meeting and assembly spaces, retail, and personal and business services.

These updated definitions are intended to:

- Define manufactured housing and manufactured housing communities (MHC) as the preferred terminology for what are commonly called mobile homes and mobile home parks.
- Create consistency and reflect changes in terminology and definitions that have occurred at the federal and state-levels for this type of housing.
- Define manufactured housing communities as a land use only when five or more manufactured homes are included on a site, aligning with new state definitions.
- Explicitly describe and permit supporting, accessory land uses within manufactured housing communities (additional detail below).

During research and outreach for the new zoning district, staff learned about many different types of accessory uses and activities that already occur in some of the manufactured housing communities in the City and Growth Management Area (GMA), including after-school programs, social clubs, educational classes, in-home childcare, religious gatherings, and small-scale retail/vending that serves the needs of residents and their homes (e.g., the
The sale of cleaning supplies or gardening tools.

The new definition for a manufactured housing community seeks to explicitly permit these types of activities and uses which are designed and operated primarily for the benefit and support of manufactured housing community residents, as opposed to a wider city audience or customer base. Similar to newer multifamily apartment complexes which provide recreational clubhouses, conference/party rooms, and other activities, these accessory uses act as supporting elements to an otherwise primarily residential development.

New Zone District: Dimensional, Size and Density Standards

The proposed setback and dimensional standards for the new zone district include:

- Minimum 15-foot front yard setbacks (e.g. space required between buildings and the front property line)
- Minimum 10-foot side and rear setbacks (e.g. space required between buildings and the side or rear property line)
- Minimum 10-foot separation between each manufactured home unit

The proposed density for the new zone district:

- Maximum of 12 dwelling units per acre

Most of the existing manufactured housing communities within city limits are currently located in the Low Density Mixed-Use Neighborhood (LMN) zone district. The LMN district permits up to 12 dwelling units per acre for designated affordable housing projects. While manufactured housing communities are not designated affordable housing (e.g., deed-restricted), they often have similar or cheaper housing costs, and as such, staff is proposing a similar maximum density threshold. The proposed density and setbacks described above are also generally consistent with the existing conditions found in these communities as well as other residential zone districts in Fort Collins which will serve to limit nonconformities with the new zone district standards.

A maximum building size and building height is also proposed for the zone district:

- Nonresidential building footprints shall be limited to a maximum of 5,000 square feet
- Maximum building height of three (3) stories

In the event that portions of an existing manufactured housing community is (re)developed, the new zone district can include a maximum building footprint size, reflecting the general character of manufactured housing communities which tend to feature smaller building footprints.

The maximum building height of three stories is consistent with the underlying zone districts where other manufactured housing communities are already located. While it is unlikely the height limit would be applicable to traditional manufactured homes, it may be relevant for other types of land uses or (re)development in the zone district, and is also consistent with the height limits of other zone districts in the City with similar development intensities.

Permitted Land Uses - Two Options

It is likely the land uses which are permitted in the new zone district will have the greatest impact on the preservation of manufactured housing. Two potential framework options are presented below that focus strictly on manufactured housing preservation (Option A), or which also include opportunities for redevelopment if it includes affordable housing (Option B). For both options, the permitted commercial and industrial uses and overall intensity of development are more limited compared to the zone districts where existing manufactured housing communities are currently located.

Option A: Manufactured Housing Preservation

The following table summarizes the proposed land uses permitted for Option A, broken down by Residential, Commercial/Institutional and Miscellaneous categories.
As part of a strict preservation-minded zone district, Option A includes very few permitted land uses, primarily manufactured housing communities and other land uses which complement residential development or support other community priorities, such as childcare, group homes, neighborhood parks, and urban agriculture.

**Option B: Affordable Housing Options**

The following table summarizes the proposed land uses permitted for Option B, broken down by Residential, Commercial/Institutional and Miscellaneous categories. Option B permits additional land uses compared to Option A, highlighted in bold text.

<table>
<thead>
<tr>
<th>Residential Uses</th>
<th>Commercial/Institutional Uses</th>
<th>Miscellaneous Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufactured housing community</td>
<td>Childcare centers</td>
<td>Urban agriculture</td>
</tr>
<tr>
<td>Shelters for victims of domestic violence</td>
<td>Adult day/respite care centers</td>
<td>Neighborhood parks</td>
</tr>
<tr>
<td>Group homes</td>
<td>Places of worship or assembly</td>
<td>Parks, recreation and other open lands</td>
</tr>
<tr>
<td>Extra occupancy rental houses</td>
<td>Minor public facilities</td>
<td></td>
</tr>
<tr>
<td>Short term primary rentals</td>
<td>Wireless telecommunications equipment</td>
<td></td>
</tr>
</tbody>
</table>

| Single family detached dwellings* | | |
| Single-family attached dwellings* | | |
| Two-family dwellings* | | |
| Multifamily dwellings* | | |

* Requires an equivalent number of affordable units when (re)development results in the loss of manufactured home units.

The key difference for Option B is the inclusion of additional residential land uses, with a condition that these units be designated affordable if their development results in the loss of any existing manufactured housing units. This option more explicitly permits private or public redevelopment which preserves an equivalent number of affordable units, rather than the sole preservation of only manufactured homes.

Option B may address concerns and ideas heard from stakeholders that a new manufactured housing zone district may perpetuate substandard infrastructure conditions which are often resolved during a site’s redevelopment absent other programs/funding sources. Option B may also allow properties a greater role in contributing to a long-term neighborhood or corridor vision and evolution.

Conversely, while an equivalent number of affordable units may be preserved, Option B does not guarantee such units would be made available to existing residents of a manufactured housing and redevelopment could still...
result in resident displacement and the loss of this unique and hard-to-replicate housing option.

If framework Option A is used to guide the new zone district, the intent behind Option B or other similar ideas, could still be possible using existing Land Use Code processes, such as a request to rezone a property or through the Addition of a Permitted Use process. Both processes featured enhanced community outreach and require public hearings with both the Planning and Zoning Board and ultimately City Council approval.

**Rezoning Evaluation Criteria**

In addition to new zone district standards, future evaluation of sites to rezone to the new zone district will also be necessary. Staff has prepared a preliminary list of criteria it plans to use to help inform decision-making for voluntary or involuntary rezoning of properties. Many of these criteria were originally developed and proposed in the City’s 2013 Affordable Housing Redevelopment and Mitigation Strategy (*Attachment 2*) which first proposed the idea of a new manufactured housing zone district in the community.

- **Community/Park Size (Acres and Units)**
  Larger communities may represent a better candidate for rezoning as they represent the majority of land area and inventory of existing manufactured housing units in the community. Larger parks also tend to offer more resident amenities, on-site management, and may be better positioned to fund or amortize maintenance costs and infrastructure upgrades over a larger unit and revenue base. In city limits, the largest communities also tend to be located in commercial or commercial-adjacent areas where redevelopment may be more likely.

- **Presence of natural hazards**
  The presence of natural or geologic hazards (e.g. floodplains) could be a safety concern and perpetuate unsafe conditions by limiting redevelopment into other land uses or buildings that meet current floodplain standards and regulations. In application, fewer than 10 units in the City’s current manufactured housing inventory are located in floodplains based on current mapping.

- **Owner-Occupied Units**
  Existing communities feature a variety of housing tenure conditions. Some residents own their unit and only pay lot rent, while others may pay rent for both a unit and land underneath. For communities with a higher percentage of owner-occupied units, there can be additional concern about park closure due to the stranding of assets if residents are unable to find a new location for their home or if they are unable to afford relocation expenses. Communities with a higher proportion of owner-occupied units may be more suitable candidates for rezoning.

- **City Plan and Subarea Plan Guidance**
  Long-term land use guidance is provided by City Plan and neighborhood or corridor. These documents provide recommendations about the anticipated changes in neighborhood character, redevelopment, and future land use vision. Any rezoning should be consistent with Fort Collins’ comprehensive plan (City Plan). Guidance from the recent City Plan update generally indicates residential zoning for existing manufactured housing communities, which is likely consistent with the new zone district.

- **Prior Zoning History**
  Prior to 1997, the City had two mobile home park zone districts, with a similar set of land use and dimensional standards to the zone district being developed. For existing manufactured housing communities that were previously located in these zone districts, a rezoning would represent the return to a similar set of permitted land uses and standards.

- **Infrastructure Conditions**
  A wide variety of infrastructure conditions exists across existing manufactured housing communities, both known and unknown. Communities with more modern infrastructure, or where upgrades have recently been completed may be better positioned for long-term operations as a manufactured housing community and more suitable candidates for rezoning.
Stakeholder Outreach

As with other (re)zoning processes, stakeholder outreach is an important part of the process. Outreach is ongoing, including updates to the Planning and Zoning and Affordable Housing Boards, and meetings and input with owners/managers of existing communities and residents of manufactured housing. Due to COVID-19 precautions, some of the planned input opportunities with stakeholders have been delayed and/or will be reoriented towards other formats. Staff anticipates sharing additional input with Council via memo in the coming weeks as additional outreach resumes.

Licensing and Residents’ Rights Strategies Update

The cross-departmental residents’ rights technical team, established in September 2019 to support Council priorities around manufactured housing livability, continues to meet biweekly to implement three projects to improve transparency and accessibility of resources: Manufactured Housing Community Handbook, Manufactured Housing Neighborhood Improvement and Community-Building Mini-Grants, and Manufactured Housing Neighborhood Liaisons. Internal and external stakeholder groups, resident groups, and manufactured housing community managers and owners are now playing an integral role in identifying livability issues, collaborating with City Staff to access resources, and providing a support network for mobile home community residents. Through this public engagement work, the residents’ rights technical team identified mobile home park licensing and associated inspections as an additional, feasible strategy to protect and enhance neighborhood livability.

Implementation Progress: Short-Term Goals (estimated completion March–June 2020)

Proposed Municipal Code Changes related to manufactured housing community livability and utility billing transparency will be submitted for Council’s consideration in Q2 2020. Draft ordinance language is attached. (Attachment 3)

Proposed Municipal Code Changes

1. Draft ordinance for utility billing transparency directs MHC owners to provide residents the calculations and criteria to manage rebilling for any combined utility services. Customer support for MHC owners and managers to rebill utility services will be provided through Utilities Customer Accounts Department. Resident support for MHC tenants with concerns about utility billing transparency will be provided through Neighborhood Services.

2. Draft ordinance makes tree trimming in manufactured housing communities the responsibility of the MHC owner without passing the costs to residents occupying the lot(s).

3. Draft ordinance adds the following to the existing emergency contact posting requirement:
   a. Onsite manager’s name and office hours are required to be posted
   b. All emergency contact information must be posted in English and Spanish

4. Draft ordinance expands the protection for assembling or participating in manufactured housing homeowner’s association meetings (under Colorado state law) to include neighborhood or community meetings for renters and other residents.

Enhanced Customer Service

1. Utilities Customer Accounts will work with MHC owners and managers to provide guidance in helping them understand current utility rates and methodology for rebilling combined utility services, that are passed along to residents.

2. To support best management practices for MHC owners and managers, Utilities Customer Accounts will develop a series of spreadsheets to assist MHC owners accurately calculate the bill for each resident. Spreadsheets will be updated annually. Customer Accounts staff is already available to provide this type of information and assistance to MHC owners upon request. Messaging about the availability of this service is incorporated into the public engagement plan for this project.

3. Utilities Community Engagement is researching options regarding manufactured housing community resident eligibility for income-qualified assistance program (IQAP) and will report findings when Utilities
Affordability Programs (UAP) changes are brought before Council. Code amendments were originally scheduled to come before Council on June 2, 2020, however due to COVID-19 emergency response, this has been delayed and amendments may not come before Council until 2021. In the meantime, Utilities Community Engagement is working closely with Neighborhood Services and neighborhood liaisons to provide information to residents about UAP offerings for which they are currently eligible. Utilities Community Engagement Staff are also providing application assistance to community members to help them apply for appropriate UAP offerings.

State-Level Changes related to Mobile Home Park Livability

1. Through the Mobile Home Park Oversight Act Dispute Resolution and Enforcement Program ("Program"), the State of Colorado created a system for MHC registration and investigation of complaints related to the Mobile Home Park Oversight Act.

2. Prohibition of retaliation and/or specific forms of retaliation and limitations on required upgrades to existing mobile homes are clearly outlined in the Colorado Department of Local Affairs Administrative Rules for the Program. City staff recommends no additional Municipal Code changes at this time on these two livability issues, as they are adequately addressed by the Program.

Implementation Progress: Mid-Term Goals (estimated completion July-December 2020)

1. Incentivized mediation participation for resident groups, managers, and property owners was determined by Neighborhood Services Mediation staff as unfeasible due to the unbalanced power dynamic between MHC owners/managers and residents. Community Mediation programs remain an available tool for conflict resolution in disagreements between residents.

2. Existing Access Fort Collins tools are being adapted to report MHC resident complaints that are outside the scope of the statewide Program.

3. Budgeting for Outcomes offer for Manufactured Housing Community Neighborhood Grant Fund for infrastructure projects similar to the Vibrant Neighborhood Grant and Community Redevelopment Grant programs funded in the past is currently on hold pending decisions on 2021-22 budget process and guidelines.

4. Through research with internal enforcement groups in Neighborhood Services Code Compliance, Zoning, Building, Utilities Environmental Regulatory Services, and Police Services, gaps in enforcement on mobile home park-specific livability ordinances were determined. Additional resources will be required to address this issue.

Implementation Progress: Long-Term Goals (estimated completion after December 2020)

1. An inventory of existing owner installed sub-metered water systems in MHCs is underway. Neighborhood Services and Utilities Customer Accounts are working with MHC owners and managers to determine best practices to distribute utility expenses, including the use of submeters. The installation of sub-meters can support rate discount programs based on income.

2. A La Familia staff member working under the Home 2 Health grant is serving as a valuable Manufactured Housing Neighborhood Liaison for MHC residents in the North College areas in Council Districts 1 and 6, as well as assisting with coordination of messaging for all MHC residents in Fort Collins. Existing Neighborhood Services staff is serving as Manufactured Housing Neighborhood Liaison for 55+ communities. An additional, dedicated Neighborhood Liaison position was in the final stages of the hiring process when a hiring freeze due to COVID-19 was implemented by the City of Fort Collins.

Licensing of Manufactured Housing Communities

The MHC strategies to address residents’ rights rely heavily on reporting by residents to begin an investigation or offer resources to address manufactured housing community-specific issues. MHCs represent an important housing choice in Fort Collins. While residents may own or rent their home, they always rent the pad the home rests upon. Residents of manufactured housing communities may not have the means to rent or purchase in other neighborhood types. Due to limited availability of manufactured housing units and lots, residents expressed
discomfort and fear of eviction and retaliation for reporting livability issues to the City. City-initiated strategies to assure residents’ rights will need to expand to incorporate additional proactive methods of identifying livability issues, such as manufactured housing community licensing.

An MHC licensing program would require additional financial and staffing resources to develop a licensing program, train staff on MHC licensing inspections, implement annual MHC inspections, and enforce penalties for deficiencies. In researching MHC licensing programs in Colorado, no effective implementation of inspection and enforcement to use as a model could be identified. However, the Community Development and Neighborhood Services Chief Building Official worked with very successful, ongoing MHC licensing programs in municipalities in his previous position in Austin, Texas and maintains positive relationships with municipal staff implementing that program and a similar licensing program in Amarillo, Texas. Both municipalities have been willing to share information and best practices for their MHC licensing programs. A Fort Collins program modeled on those programs would include funding for inspections and administrative costs through licensing fees paid by manufactured housing community owners. Given the recent addition of MHC registration fees and the cost of mobile home lot rent in Fort Collins, particular consideration would need to be given to the additional costs of any MHC licensing fees that might be passed along to residents.

ATTACHMENTS

1. December 2019 Manufactured Housing Work Session Summary (PDF)
2. Affordable Housing Redevelopment Displacement Mitigation Strategy (PDF)
3. Proposed Municipal Code Changes (PDF)
4. PowerPoint Presentation (PDF)
MEMORANDUM

DATE: December 13, 2019
TO: Mayor Troxell and City Councilmembers
THRU: Darin Atteberry, City Manager
       Jeff Mihelich, Deputy City Manager
       Caryn Champine, Planning, Development & Transportation Director
       Dean Klinger, Planning, Development & Transportation Deputy Director
FROM: Tom Leeson, Community Development & Neighborhood Services Director
       Sue Beck-Ferkiss, Social Policy & Housing Program Manager
CC: Jacqueline Kozak Thiel, Chief Sustainability Officer
RE: December 10, 2019 Work Session Summary – Manufactured Housing Preservation & Livability Strategies

At the December 10th, 2019 Council Work Session, Jeff Mihelich, Tom Leeson, and Sue Beck-Ferkiss presented an overview of preservation and livability strategies for manufactured housing communities, focusing on a new manufactured housing zone district, and a menu of livability and residents’ rights options that could be implemented in the coming year. All councilmembers were present for the discussion.

Manufactured Housing Zoning
Staff noted general support and direction to move forward with a new manufactured housing zone district in Fort Collins, and to continue discussions with Larimer County about options for similar efforts for the manufactured housing parks beyond city limits in the Growth Management Area.

Several councilmembers indicated interest in exploring the means to encourage or require housing options in the zone district that are similar in size and relative affordability to manufactured housing if those housing types are also permitted in the new zone district. Staff also noted comments to think about the long-term implications of a new zone district and how it promotes safe, durable, and energy efficient housing that can change and transition over time.

Staff will begin in-depth conversations with manufactured housing community owners and residents and begin crafting zone district standards in the coming months in preparation for Council consideration of a new zone district and potential rezoning locations in April 2020.

Livability & Residents’ Rights Strategies
Staff shared a number of livability and resident rights policy ideas with Council related to tree and maintenance responsibilities, utility billing transparency, anti-retaliation measures, safety, and more. Councilmembers supported moving forward with a broad range of strategies and emphasized particular areas for short-term action, including:
• **Enforcement of Livability Codes in Manufactured Housing Communities** - Staff will continue exploring the applicability and enforcement of existing codes within manufactured housing communities as large private property sites that may not be visible to enforcement staff from public streets. A forthcoming Council memo from Neighborhood Services is planned to discuss issues, options, and next steps for this strategy.

• **Tree Maintenance** – Both Council and manufactured housing residents brought up the importance of clarifying tree maintenance roles and responsibilities as an important safety and livability issue. As a short term action, staff will bring forward code options for tree maintenance for Council’s consideration.

• **Utility Billing Transparency** – Staff is moving quickly to implement new tools and resources (calculators, formulas, staff consultation with owners) to improve the equitable apportionment and transparency of utility billing in manufactured housing communities. Staff is also evaluating and working on mid-term and long-term efforts from Council’s discussion related to ideas such as sub-metering of individual units, private infrastructure planning and maintenance standards, conservation efforts, and model utility billing requirements.

**Next Steps**
Based on Council’s discussion and feedback, staff is moving forward with the identified list of short-term actions which includes the manufactured housing zone district, and resident rights updates relating to tree maintenance, utility billing transparency, prohibition of home sale protection, limitation of required upgrades and anti-retaliation measures.

In addition, staff will conduct additional research and evaluation on several additional policy ideas discussed at the work session, including:

• **Alternative Ownership Opportunities** – Ownership and/or operation of manufactured housing communities by residents, non-profits, housing authorities, or the City could be an option when communities are available for purchase in the future. Additional study of policy frameworks and resource implications are needed for each type of ownership opportunity.

• **Licensure** – Staff noted discussion about other communities, such as Aurora, that require a license for manufactured housing communities, which helps establish expectations and standards for operations within manufactured housing communities. Staff will explore the rental and manufactured housing licensing systems used in other communities and what types of additional resources and staffing may be required to implement a similar approach in Fort Collins.

• **Mini-Grant Requirements** – Determine what, if any, requirement or conditions are appropriate for the awarding of mini-grant funds. While requirements or conditions for the mini-grant program may not be best due to the small amounts involved, such conditions could be used in larger negotiated agreements in the future.

For all upcoming work, staff will also be consulting with Larimer County to understand opportunities for collaboration to develop similar efforts for communities and residents in the Growth Management Area.
Affordable Housing Redevelopment Displacement Mitigation Strategy

City of Fort Collins
In Association with
Clarion Associates and
National Manufactured Home Owners Association

March 26, 2013
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**Affordable Housing Redevelopment Displacement Mitigation Strategy**
Affordable Housing Redevelopment Displacement Mitigation Strategy

1. INTRODUCTION / DEFINING THE ISSUE

Affordable rental units and mobile home parks are two important sources of housing for lower income working families, seniors, and people with disabilities living in Fort Collins. While redevelopment of older or underutilized properties for higher intensity uses is part of a healthy urban economy (and supported by City Plan, the City of Fort Collins' comprehensive plan), redevelopment of affordable rental units and mobile home parks can create unusual hardships if the residents cannot afford to pay to move their units or belongings or cannot find affordable replacement housing.

Affordable multi-family rental units are the more common form of lower-income housing, and Fort Collins has several programs in place to acquire, manage, and preserve apartment buildings on a non-profit basis in order to keep rents at affordable levels. In addition, some for-profit apartment projects have received Low Income Housing Tax Credits (LIHTC) in return for commitments to maintain affordable rents in at least some of the units. Data on these projects provides a snapshot of the city's current supply of committed affordable rental units, and a possible focus for efforts to protect these units or mitigate impacts on their tenants if they are redeveloped. However, many renters live in for-profit apartment complexes that have not used LIHTC and are not managed with a specific intent to preserve affordability (in other words, units are rented at market rates, which may or may not be affordable to low-income residents). This strategic plan addresses mitigation strategies for low-income residents in those market rate rental complexes in Recommendations 1, 2, 4, and 7 below.

Another form of housing that provides opportunities for lower income household is mobile/manufactured homes. Some residents rent while others own their mobile/manufactured homes. Mobile/manufactured homeowners are in a unique situation because they are both homeowners (because they own their individual home) and tenants (because they do not own the land on which their home is located). Typically, the decision of a mobile home park owner to close the park and/or redevelop it for other uses is made without the involvement of the mobile/manufactured home owners. Unlike an apartment tenant whose lease expires or is terminated, a mobile/manufactured home owner must not only move their personal belongings, but must also move the house itself or find another form of replacement housing (e.g., a rental apartment, a townhouse/condo affordable for purchase, etc.). This situation is complicated by three factors:

- Some mobile/manufactured homes are worth so little that it is not cost-effective to move them;
- Some mobile/manufactured homes are so old that they would not withstand a relocation because of likely structural damage during the move; and
- Some local governments (but not the City of Fort Collins) and some mobile home park communities prohibit the siting of mobile homes constructed before 1976 because they predate federal safety standards, which may leave the mobile home owner with no viable
place to move the unit. In Fort Collins, all mobile homes are inspected when they are set. The State requires a foundation set inspection and the City will release utilities only after the State inspection approval.

For a variety of reasons, the Fort Collins community has seen the closure of several mobile home parks that displaced park residents. The following table provides a list of park closures and the reasons for those closures.

<table>
<thead>
<tr>
<th>Park Name</th>
<th>Reason for Closure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pioneer Mobile Home Park</td>
<td>Commercial redevelopment</td>
</tr>
<tr>
<td>Johnson Mobile Home Park</td>
<td>Natural flood disaster</td>
</tr>
<tr>
<td>Dry Creek Mobile Home Park</td>
<td>Property subdivided into single-family lots</td>
</tr>
<tr>
<td>Grape Street</td>
<td>Commercial redevelopment</td>
</tr>
<tr>
<td>Bender Mobile Home Park</td>
<td>Residential redevelopment</td>
</tr>
</tbody>
</table>

In all of these cases, City staff provided support and collaborated with other agencies, such as the Fort Collins Housing Authority, Federal Emergency Management Association (FEMA), Neighbor-to Neighbor, the Colorado Department of Local Affairs, and the U.S. Department of Housing and Urban Development, to relocate or find other types of replacement housing for park residents. However, the City's involvement was different in each case. The City followed an ad hoc, case-by-case approach to mitigate the impacts of each situation. This strategic plan addresses mitigation strategies for residents of mobile/manufactured home parks in recommendations 1 through 7 below.

The City Council placed the development of an “Affordable Housing Relocation Strategic Plan” on their 2012 Work Plan. The purpose of the strategic plan is to develop City policies and requirements applicable to redevelopment projects by defining the City’s role, responsibilities, obligations, and involvement in redevelopment projects that cause the displacement of low-income people from their homes (with an emphasis on mobile home parks), whether they are located inside the City limits or within the Growth Management Area (GMA), within the restrictions of the City Charter. The strategic plan establishes policies and procedures for the next time redevelopment causes displacement of residents of affordable housing, and also sets forth strategies to preserve existing affordable housing.

Throughout this document, the following definitions are used to describe several key terms:

- **Mobile home** means a factory built and transportable dwelling unit constructed before June 15, 1976 – the date that the federal Manufactured Home Act became effective and required that all manufactured homes meet federal safety standards.
• "Manufactured home" means a factory built and transportable dwelling unit that was constructed after June 15, 1976 to meet the standards of that Act.

• "Mobile/Manufactured home" means a factory built and transportable dwelling unit regardless of the date when it was manufactured.

• "Mobile home park" means a residential area containing manufactured homes, mobile homes, or both, and in which at least some of those homes are owned by individuals other than the mobile home park owner. If the mobile home park owner also owns all of the individual mobile/manufactured homes and rents them to others, the tenants are in the same situation as apartment renters, because they have not invested to purchase the mobile/manufactured home and are not responsible for moving it upon park closure.¹

• Affordable housing means a dwelling unit that is available for rent or ownership on terms that would be affordable to households earning 80% or less of the median income of city residents, adjusted for family size, and paying either (a) for a renter, less than 30% percent of gross income for total housing costs, including rent and utilities, or (b) for an owner, less than 38% of gross income for total housing costs, including principal, interest, taxes, insurance, utilities, and homeowners’ association fees.

Two additional facts are important to note.

First, under Colorado law, a mobile or manufactured home that is installed on a permanent foundation becomes both “real estate” (for taxation purposes), and a “single family home” (for zoning purposes). So, for example, the Sunflower retirement community located on the south side of East Mulberry Street, east of Interstate 25 is not technically a mobile home park but a single family residential subdivision with lots designed to accommodate manufactured housing units.

Second, despite their name, most mobile and manufactured homes are not very mobile. Although designed for transport from the factory to a residential lot, most mobile and manufactured homes never move from the lot where they are originally installed. Many modern zoning and building codes encourage this result by requiring removal of wheels or tongues and by requiring skirting, anchoring, and semi-permanent utility hookups, all of which make it less likely that the unit will be moved in the future.

¹ The use of these definitions will generally parallel those used in Colorado Revised Statutes as they relate to land use law. Although Colorado law includes several different definitions for these terms (including those in CRS 5-1-301 (29), 24-32-3302(13) and (24), 38-12-201.5 (2), 38-29-102 (6), 42-1-102 (106) (b)), many of those definitions concern matters unrelated to land use and housing, such as the homestead tax exemption, regulation of security deposits, or the allocation of regulatory powers between state agencies.
II. EXECUTIVE SUMMARY

As detailed in the City of Fort Collins' Affordable Housing Strategic Plan, affordable rental units (apartments and homes), mobile homes (pre-1976), and manufactured homes (1976 and later, which meet HUD safety standards) provide important sources of affordable housing in Fort Collins and Larimer County. When affordable residential units are lost, they compound the difficulty of meeting the City's affordable housing needs.

Many of the existing affordable units are located in mobile home parks, which raise challenges when mobile home parks are redeveloped for other uses. Mobile/manufactured home owners own their homes but rent the spaces where they are located. When mobile home parks close, residents need to move their homes to other locations, which is complicated by the fact that many homes are old and difficult to move and spaces in mobile home parks are often in short supply (particularly for older homes). If the mobile/manufactured home cannot be moved, the owner faces the loss of not just a place to live but an asset that they have purchased. In recent years, Fort Collins has experienced several mobile home park closures, has been asked to assist in relocating residents, and has done so on an ad-hoc basis. This document sets a strategic policy direction for the City to address these issues in a more consistent way in the future.

This strategic plan recommends that Fort Collins take the following seven steps to address these issues, each of which is described in more detail in the pages that follow.

1. Continue to expand the inventory of “designated affordable” dwelling units, buildings, and complexes through current programs administered by the Fort Collins Housing Authority, other non-profit affordable housing agencies, and private developers.

2. Continue to offer relocation assistance to those residents of affordable units redeveloped with the use of federal, Fort Collins Urban Renewal Authority (FCURA), or other City funds, but do not extend a requirement to pay relocation expenses in private redevelopment projects that do not use public funds and do not require a discretionary land use decision by the City.²

3. Draft a Manufactured Home Park Zoning District and rezone into that district those mobile home parks that are relatively large and can serve as significant sources of affordable housing for the long term. From 1965 to 1997 the City of Fort Collins had two mobile home park zoning districts and most of the existing mobile home parks located inside the city limits were zoned in one of those districts. A copy of the City’s former M-M Medium Density Mobile Home Park district is attached for reference.

4. Create a loan or grant program, or use the existing financial assistance competitive process, that would be available to finance significant investments in new or existing affordable

² The Fort Collins Urban Renewal Authority is currently considering narrowing its relocation assistance policies to apply only when there is an eminent domain/condemnation action by the URA. This policy change would have a significant impact on mobile/manufactured home owners, since they do not own the land that is the subject of the condemnation action and generally do not participate in the negotiations. This represents a departure from federal Uniform Relocation Act requirements followed by the Fort Collins URA in the past, which were designed to protect renters in these types of situations.

Affordable Housing Redevelopment Displacement Mitigation Strategy
housing infrastructure that would be available to those larger mobile home parks willing to commit to continuing operation of their mobile home parks for at least 10 years.\(^3\)

5. Require a one (1) year notice of closure period for mobile home parks (rather than the 6 month minimum notice required by the state). As an alternative, allow a six (6) month closure notice if the park owner delivers to each resident on or before the notice date a detailed Relocation Report listing all available mobile home park spaces available within 25 miles, providing the contact information for each of those park owners, and including documented estimates of the costs of moving mobile/manufactured homes to those locations. In addition, the notice provision shall also alert residents that the park may be closed before the mandatory notice period has expired if all park residents have been successfully relocated to each party’s mutual satisfaction.\(^4\)

6. Require that redevelopment projects involving City financial assistance or a discretionary land use decision by the City pay (a) actual costs of relocating owner occupied mobile/manufactured homes to a new site within a 25 mile radius of the mobile home park, up to a maximum of $6,000 for a single-wide home and $8,000 for a double-wide home, and (b) the actual value (as determined by the County Assessor) of any home that is structurally able to be moved but that cannot be moved due to the unavailability of any spaces within 25 miles, and (c) one-half of the actual value (as determined by the County Assessor) of any mobile/manufactured homes that cannot be moved due to structural weakness or poor condition.\(^5\)

7. Build the capacity of homeowner groups, non-profit affordable housing providers, and support organizations to purchase affordable housing types, including mobile home parks, offered for redevelopment and manage them as long-term sources of affordable housing.\(^6\)

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\(^3\) Wording revised to broaden applicability to all affordable housing infrastructure, as recommended by Planning and Zoning Board.

\(^4\) Wording revised to reflect recommendations of the Affordable Housing Board.

\(^5\) Affordable Housing Board recommended that this provision be strengthened, and Planning and Zoning Board recommended that it be deleted. Recommendation remains unchanged from Public Review Draft, except that relocation cost caps recommended by the AHB have been included.

\(^6\) Wording revised to reflect Planning and Zoning Board recommendation to broaden impact to include purchase of all types of affordable housing.
III. CURRENT CITY POLICIES

The City of Fort Collins has adopted several policies that underlie this strategic plan and influence the above recommendations discussed in greater detail in this document.

A. FROM CITY PLAN

Policy LIV 7.2 – Develop an Adequate Supply of Housing

Encourage public and private for-profit and non-profit sectors to take actions to develop and maintain an adequate supply of single- and multiple-family housing, including mobile homes and manufactured housing.

Policy LIV 8.6 – Mitigate Displacement Impacts

Explore ways to mitigate the impact upon residents displaced through the closure of manufactured housing parks or conversion of rental apartments, including single room occupancy units, to condominiums or other uses.

Near-Term Implementation Actions: 2011 And 2012

24. Relocation Plan - Develop a proactive plan to address the issue of resident displacement due to redevelopment activities.

B. FROM THE AFFORDABLE HOUSING STRATEGIC PLAN 2010-2014

Priority #2: Preserve existing affordable housing units.
IV. INVENTORY AND ANALYSIS

A. APARTMENTS WITH INCOME CONTROLS

The following table identifies properties that have received Low Income Housing Tax Credits (LIHTC) to aid in the development of affordable multi-family housing units. To be eligible for the program, LIHTC properties must include income restrictions, rent restrictions, and extended-use requirements. At a minimum, at least 40 percent of the property must be set aside for families earning below 60 percent of Area Median Income (AMI), or at least 20 percent of the property must be set aside for families earning below 50 percent of the AMI. Rents are restricted by income group, bedroom size, and AMI, and rents must include utility costs. All developments must maintain the rent and income requirements through a 15-year compliance period and a 15-year extended-use period, for a minimum total of 30 years (many projects have a total of 40 years). The requirements are enforced by the Colorado Housing Finance Authority (CHFA) through a Land Use Restriction Agreement that is recorded against the property.

<table>
<thead>
<tr>
<th>Apartment Complex Name</th>
<th>Number of Units</th>
<th>LIHTC Land Use Restriction Agreement Expiration Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hickory Hill Village 3425 Windmill Drive</td>
<td>92</td>
<td>?</td>
</tr>
<tr>
<td>Rose Tree Village Apts. 1000 W. Horsetooth Road</td>
<td>120</td>
<td>?</td>
</tr>
<tr>
<td>CARE Housing/Greenbriar Village 400 Butch Cassidy Drive</td>
<td>40</td>
<td>2025</td>
</tr>
<tr>
<td>Buffalo Run Apartments 1245 E. Lincoln Avenue</td>
<td>144</td>
<td>2037</td>
</tr>
<tr>
<td>CARE Housing at Eagle Tree 6675 S. Lemay Avenue</td>
<td>36</td>
<td>2037</td>
</tr>
<tr>
<td>Reflections Senior (aka JFK Sr. Apts.) 321 E. Troutman Parkway</td>
<td>72</td>
<td>2038</td>
</tr>
<tr>
<td>Elizabeth St. Senior Apartments 1508 W. Elizabeth Street</td>
<td>50</td>
<td>2039</td>
</tr>
<tr>
<td>CARE Housing/Windtrail Park Apartments 2120 Bridgefield Land</td>
<td>50</td>
<td>2039</td>
</tr>
<tr>
<td>Northern Hotel 172 N. College Avenue</td>
<td>47</td>
<td>2040</td>
</tr>
</tbody>
</table>

Hickory Hill Village and Rose Tree Village Apartments were acquired from private investors by the Fort Collins Housing Authority on December 31, 2012. At this time, it is not known what the new affordability expiration dates will be for these complexes.
<table>
<thead>
<tr>
<th>Apartment Complex Name</th>
<th>Number of Units</th>
<th>LIHTC Land Use Restriction Agreement Expiration Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>CARE Housing/Fairbrooke Heights 1827 Somerville Drive</td>
<td>36</td>
<td>2041</td>
</tr>
<tr>
<td>CARE Housing/Provincetowne 626 Quaking Aspen Drive</td>
<td>85</td>
<td>2041</td>
</tr>
<tr>
<td>Bull Run 820 Merganser Drive</td>
<td>176</td>
<td>2042</td>
</tr>
<tr>
<td>Country Ranch 2921 Timberwood Drive</td>
<td>118</td>
<td>2042</td>
</tr>
<tr>
<td>Fox Meadows Apartments 3644 S. Timberline Road</td>
<td>138</td>
<td>2042</td>
</tr>
<tr>
<td>Oakbrook/Manor Apartments 3200 Stanford Road</td>
<td>107</td>
<td>2042</td>
</tr>
<tr>
<td>Residence at Oak Ridge 4750 Wheaton Drive</td>
<td>44</td>
<td>2042</td>
</tr>
<tr>
<td>Woodland Apartments 1025 Wakerobin Lane</td>
<td>116</td>
<td>2042</td>
</tr>
<tr>
<td>CARE Housing/Swallow 1303 W. Swallow Road</td>
<td>40</td>
<td>2045</td>
</tr>
<tr>
<td>Springfield Court 3851 S. Taft Hill Road</td>
<td>63</td>
<td>2045</td>
</tr>
<tr>
<td>Caribou Apartments 4135 Verbena Way</td>
<td>97</td>
<td>2047</td>
</tr>
<tr>
<td>Village on Elizabeth 2217 W. Elizabeth</td>
<td>48</td>
<td>2047</td>
</tr>
<tr>
<td>Village on Stanford 2631 Stanford Road</td>
<td>82</td>
<td>2048</td>
</tr>
<tr>
<td>Caribou Apartments - Phase II 4125 S. Timberline Road</td>
<td>96</td>
<td>2051</td>
</tr>
<tr>
<td>Legacy Senior Residences (Proposed) 411 Linden Street</td>
<td>72</td>
<td>2051</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>1,969</strong></td>
<td></td>
</tr>
</tbody>
</table>

The table above shows that there will not be a significant loss of LIHTC-protected affordable units within the next decade.

In addition, the Fort Collins Housing Authority’s current Strategic Plan calls for its “Villages Program” to acquire approximately 40 additional rental units each year for rehabilitation and preservation as affordable housing. The Authority is generally meeting this goal, and has
additional goals of developing 60 new permanent supportive housing units in 2013, preserving another existing 70 units in 2014, and preserving an additional 70 new townhouses in 2015. Obtaining the funds to achieve these goals may require selling off some single-family units currently owned by the Authority (which are more expensive to manage but will result in a net gain of preserved affordable housing units).

Maps showing the locations of the above-listed affordable housing complexes are provided as attachments.

B. MOBILE HOME PARKS

The current inventory of mobile home parks in Fort Collins and the Growth Management Area (GMA) are shown in the table below. The table distinguishes between mobile home parks that are located:

1. Within the Fort Collins City limits – which would be subject to any new relocation mitigation policies and strategies adopted by City Council; or

2. Within the GMA and adjacent to the City limits – which would require Fort Collins’ annexation and approval of any redevelopment proposal under the terms of the GMA agreement with Larimer County, but would not be subject to any mitigation strategies intended to be applied before annexation and redevelopment; or

3. Within the GMA and not adjacent to City limits, which would not be subject to any relocation mitigation strategies adopted by the Fort Collins City Council.

<table>
<thead>
<tr>
<th>Mobile Home Park Name</th>
<th>Number of Units</th>
<th>Owner Units</th>
<th>Owner Percentage</th>
<th>Renter Units</th>
<th>Current Zoning</th>
<th>Targeted Redevelopment Area?</th>
<th>Park Ownership Location</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>WITHIN CITY LIMITS</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cottonwood</td>
<td>13</td>
<td>12</td>
<td>92%</td>
<td>1</td>
<td>LMN</td>
<td></td>
<td>CO</td>
</tr>
<tr>
<td>1330 Laporte Avenue</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Harmony</td>
<td>451</td>
<td>352</td>
<td>78%</td>
<td>99</td>
<td>LMN</td>
<td>Yes</td>
<td>Other</td>
</tr>
<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Meldrum/Cherry St.</td>
<td>5</td>
<td>0</td>
<td>0%</td>
<td>5</td>
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</tr>
<tr>
<td>329 N. Meldrum Street</td>
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<td></td>
<td></td>
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<td>Hickory Village</td>
<td>205</td>
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<td>CO</td>
</tr>
<tr>
<td>400 Hickory Street</td>
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<td></td>
<td></td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>Montclair Motel</td>
<td>10</td>
<td>0</td>
<td>0%</td>
<td>10</td>
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<td>FC</td>
</tr>
<tr>
<td>1405 N. College Avenue</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>North College (East)</td>
<td>96</td>
<td>35</td>
<td>36%</td>
<td>61</td>
<td>CS</td>
<td>Yes</td>
<td>FC</td>
</tr>
<tr>
<td>1601 N. College Avenue</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>North College East)</td>
<td>46</td>
<td>8</td>
<td>18%</td>
<td>38</td>
<td>CS</td>
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<td>FC</td>
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<tr>
<td>1601 N. College Avenue</td>
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<td></td>
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<tr>
<td>North College (West)</td>
<td>166</td>
<td>148</td>
<td>89%</td>
<td>18</td>
<td>LMN</td>
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<td>FC</td>
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<tr>
<td>1601 N. College Avenue</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mobile Home Park Name</td>
<td>Number of Units</td>
<td>Owner Units</td>
<td>Owner Percentage</td>
<td>Renter Units</td>
<td>Current Zoning</td>
<td>Targeted Redevelopment Area?</td>
<td>Park Ownership Location</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>-----------------</td>
<td>-------------</td>
<td>------------------</td>
<td>--------------</td>
<td>----------------</td>
<td>-----------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Northstar 1700 Laporte Avenue</td>
<td>35</td>
<td>32</td>
<td>91%</td>
<td>3</td>
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<tr>
<td>Northstar 1700 Laporte Avenue</td>
<td>15</td>
<td>12</td>
<td>80%</td>
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<tr>
<td>Pleasant Grove 517 E. Trilby Road</td>
<td>106</td>
<td>76</td>
<td>72%</td>
<td>30</td>
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<td>Other</td>
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<td>Skyline 2211 W. Mulberry Street</td>
<td>61</td>
<td>58</td>
<td>95%</td>
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<td>LMN</td>
<td></td>
<td>Other</td>
</tr>
<tr>
<td>Skyline 2211 W. Mulberry Street</td>
<td>102</td>
<td>98</td>
<td>96%</td>
<td>4</td>
<td>LMN</td>
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<td>Other</td>
</tr>
<tr>
<td>Stonecrest 1303 N. College Avenue</td>
<td>25</td>
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<td>0%</td>
<td>25</td>
<td>CS</td>
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<td>CO</td>
</tr>
<tr>
<td><strong>TOTAL (IN CITY)</strong></td>
<td><strong>1,336</strong></td>
<td><strong>977</strong></td>
<td><strong>73%</strong></td>
<td><strong>359</strong></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

| CONTIGUOUS TO CITY LIMITS                   |                 |             |                  |              |                |                             |                        |
| Collins Aire North 401 N. Timberline Road   | 159             | 111         | 70%              | 48           | O              |                             | Other                  |
| Collins Aire South 401 N. Timberline Road   | 121             | 104         | 86%              | 17           | O              |                             | Other                  |
| Highland Manor 301 Spaulding Lane           | 5               | 5           | 100%             | 0            | M1             |                             | FC                     |
| Highland Manor 301 Spaulding Lane           | 30              | 30          | 100%             | 0            | M1             |                             | FC                     |
| Poudre Valley 2025 N. College Avenue        | 332             | 286         | 86%              | 46           | M1             |                             | CO                     |
| Spaulding Lane 242 Spaulding Lane           | 7               | 7           | 100%             | 0            | M1             |                             | FC                     |
| Timberidge North 3717 S. Taft Hill Road     | 281             | 228         | 81%              | 53           | M1             |                             | Other                  |
| **TOTAL (CONTIGUOUS)**                      | **935**         | **771**     | **82%**          | **164**      |                |                             |                        |

<table>
<thead>
<tr>
<th>IN GROWTH MANAGEMENT AREA AND NOT CONTIGUOUS TO CITY LIMITS</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Aspen 400 S. Overland Trail</td>
<td>25</td>
<td>14</td>
<td>56%</td>
<td>11</td>
<td>M1</td>
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<td>CO</td>
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<tr>
<td>Blue Spruce 2704 N. Shields Street</td>
<td>24</td>
<td>24</td>
<td>99%</td>
<td>0</td>
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<td>FC</td>
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<tr>
<td>Equestrian Center 2024 N. Whitcomb St.</td>
<td>3</td>
<td>1</td>
<td>33%</td>
<td>2</td>
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<td>Other</td>
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<tr>
<td>Highland Manor 301 Spaulding Lane</td>
<td>17</td>
<td>17</td>
<td>99%</td>
<td>0</td>
<td>M1</td>
<td></td>
<td>FC</td>
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Affordable Housing Redevelopment Displacement Mitigation Strategy

Packet Pg. 80
<table>
<thead>
<tr>
<th>Mobile Home Park Name</th>
<th>Number of Units</th>
<th>Owner Units</th>
<th>Owner Percentage</th>
<th>Renter Units</th>
<th>Current Zoning</th>
<th>Targeted Redevelopment Area?</th>
<th>Park Ownership Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mountainview</td>
<td>30</td>
<td>15</td>
<td>50%</td>
<td>15</td>
<td>R-2</td>
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<td>CO</td>
</tr>
<tr>
<td>3109 E. Mulberry Street</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parklane</td>
<td>62</td>
<td>44</td>
<td>71%</td>
<td>18</td>
<td>C</td>
<td>Yes</td>
<td>CO</td>
</tr>
<tr>
<td>411 S. Court Street</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Terry Cove</td>
<td>24</td>
<td>3</td>
<td>12%</td>
<td>21</td>
<td>R</td>
<td>FC</td>
<td>FC</td>
</tr>
<tr>
<td>221 W. Douglas Road</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Terry Lake</td>
<td>27</td>
<td>2</td>
<td>7%</td>
<td>25</td>
<td>O</td>
<td>FC</td>
<td>FC</td>
</tr>
<tr>
<td>437 N. Hoghway 287</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Timberridge South</td>
<td>293</td>
<td>214</td>
<td>73%</td>
<td>79</td>
<td>M1</td>
<td>Other</td>
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<tr>
<td>2300 W. County Rd 38E</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>White's</td>
<td>5</td>
<td>0</td>
<td>0%</td>
<td>5</td>
<td>R</td>
<td>FC</td>
<td>FC</td>
</tr>
<tr>
<td>2131 W. County Rd 38E</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td><strong>TOTAL (GMA)</strong></td>
<td><strong>510</strong></td>
<td><strong>334</strong></td>
<td><strong>65%</strong></td>
<td><strong>176</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

To summarize:

- There are currently 1,336 mobile homes within the Fort Collins City limits, 935 inside the GMA and contiguous to the City limits, and 510 inside the GMA but not contiguous to the City limits.\(^8\)

- The percentage of owner-occupied homes in these parks varies significantly. It averages 73% in the City, 82% in parks contiguous to the City limits, and 65% in the remainder of the GMA.

- Eight of the 14 mobile home parks within Fort Collins are located in a targeted redevelopment area.

- For those parks located within the Fort Collins City limits, 24% of the mobile/manufactured home sites are owned by Fort Collins owners, 22% by owners based elsewhere in Colorado, and 54% by out-of-state owners.

- For those parks located contiguous to the Fort Collins City limits, out-of-state ownership predominates: 4% are owned by Fort Collins individuals or entities, 36% by Colorado owners, and 60% by out-of-state entities or individuals.

- The vast majority (86%) of the mobile home parks within Fort Collins are currently zoned LMN Low Density Mixed Use Neighborhood, and almost all of the remainder are in the C-S Service Commercial district. Five units are in the NCB Neighborhood Conservation Buffer district. The Fort Collins Land Use Code allows new mobile home parks to be created in either the LMN or E Employment districts, but no parks currently exist in the E district. New parks require a public hearing and approval by the Planning and Zoning Board.

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\(^8\) In addition, the Cloverleaf Mobile Home Park contains 480 units contiguous to the city limits, but those units are not included in these totals because they are located in Timnath’s GMA.
The City of Fort Collins tracks activity in locating (new or used) mobile/manufactured homes in (new or existing) mobile home parks. Since 2006 there have been no new mobile home parks created in Fort Collins. Activity in existing mobile home parks varies significantly from year to year as shown in the table below.

<table>
<thead>
<tr>
<th>Year</th>
<th>Manufactured Home Setups</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006</td>
<td>34</td>
</tr>
<tr>
<td>2007</td>
<td>14</td>
</tr>
<tr>
<td>2008</td>
<td>12</td>
</tr>
<tr>
<td>2009</td>
<td>27</td>
</tr>
<tr>
<td>2010</td>
<td>28</td>
</tr>
<tr>
<td>2011</td>
<td>63</td>
</tr>
</tbody>
</table>

A more complete inventory of mobile home park conditions and maps showing the location of each park is attached to this strategic plan document.

Unfortunately, it has not been possible to gather reliable information about the income levels, rental charges, or the relative burden of incomes to rents and utilities in any of the existing mobile home park communities. Anecdotal information from the various stakeholder meetings indicates that the majority of residents living in the mobile home park communities in and near Fort Collins are lower-income residents but that accurate and detailed income data would be difficult to obtain.
V. PUBLIC INVOLVEMENT

Three key stakeholder groups were convened three times during the preparation of this strategic plan document. The three identified stakeholder groups included (1) Mobile home park property owners, (2) Mobile home park residents (both home owners and renters), and (3) Affordable housing and human service agencies.

Each group was convened in September 2012 to introduce the project, review preliminary research regarding mobile home park preservation techniques and relocation assistance, and request input for this strategic plan. On October 23, 2012, the results of initial research and stakeholder meetings were reported to the Fort Collins City Council in a work session. At that time, City Council neither eliminated nor endorsed any of the approaches used to mitigate the impacts of affordable housing dislocations in other communities, but rather asked that the planning team outline the pros and cons of each approach that it deemed worthy of consideration and directed the planning team to make recommendations based on its evaluation of those advantages and disadvantages. In November 2012, the three stakeholder groups were re-convened to communicate City Council’s reaction and direction.

Finally, on January 24, 2013, an open house meeting was held to introduce and solicit comments on the draft strategic plan document in anticipation of the further public review of the document by the Affordable Housing Board, Planning and Zoning Board, and City Council. In preparation for the January open house, individual notices were mailed to each the address of each mobile/manufactured home and each mobile home park owner. Approximately 80 mobile/manufactured homeowners, park owners or representatives, and interested citizens attended the open house. In addition, an on-line survey describing the seven recommendations in the Public Review Draft of this report was designed and data collected from January 16 through February 14, 2013.

The major themes emerging from stakeholder consultations in October, November, and January are summarized below:

- None of the mobile home parks listed in the inventory have an operating homeowners’ association, so residents participated individually. Despite attempts to reach residents through printed notices (Spanish and English), e-mail notifications, and relying on resident champions (although not through an individualized notice to each homeowner), attendance by mobile/manufactured home residents was light, but attendance at the January open house was significantly higher. Mobile/manufactured home residents are very apprehensive about the disruption to their lives, the expense of relocation, and the potential impossibility of finding mobile/manufactured home relocation sites if their parks are redeveloped in the future. While interested in potential relocation assistance, they are more interested in steps that could be taken to keep the existing mobile home parks in operation as mobile home parks and/or allow the residents to purchase the parks if the park is proposed for redevelopment.

- Mobile home park owners were well represented both individually and by a representative of the Rocky Mountain Home Association. While particularly interested in the ability to continue operating the existing mobile home parks and to reposition those parks for different
configurations of lots (for example, to convert two single-wide lots to a double-wide lot) and willing to discuss City incentives to reinvest in the parks to keep them financially viable, several owners felt it would be inappropriate for the City to take steps to discourage or prevent the redevelopment of mobile home parks for other uses dictated by market forces, or to require the payment of relocation expenses when redevelopment occurs.

- Affordable housing advocates and social service agencies indicated that although there are currently no non-profit developers or housing management agencies engaged in purchasing mobile home parks in order to preserve the existing housing, that approach might be worth discussing. The agencies expressed support for the long-term possibility of non-profit purchase and ownership of mobile home park(s), but none felt they had the expertise to undertake such a project in the near-term. Similarly, CHFA indicated that it had never assisted in financing the purchase of a mobile home park for the purpose of preserving affordable housing, but that there appears to be no legal prohibition on their doing so if resources were available.

- In addition, Fort Collins staff has kept the Larimer County Planning Department, the Larimer County Health Department, the Fort Collins Affordable Housing Board, and the Planning and Zoning Board informed about this project. The Affordable Housing Board discussed this project on October 4, 2012, and generally commented that:
  - An extended (12 month) notice-of-closure requirement would be helpful;
  - Some parks do not have long-term viability and should be allowed to redevelop with some requirements for including affordable housing and/or incentives for the inclusion of that housing;
  - Incentives that would allow additional density for inclusion of affordable housing when mobile home parks are redeveloped;
  - Organizing and supporting resident-owned parks is difficult, and would require strengthening non-profit groups to support them; and
  - The creation of incentives is preferable to the creation of a Manufactured Home Park zoning district.

- The Affordable Housing Board discussed the Public Review Draft of this strategic plan a second time on February 7, 2013, and made the following two specific recommendations for changes to the document:
  - First, the AHB recommended that plan recommendation 5 (concerning expanded notices of closure) be reworded to require that notices make the residents aware that the park might be closed earlier than the closure notice period if all residents had been relocated to their mutual satisfaction. That recommendation was incorporated into this document.
  - Second, the AHB recommended that plan recommendation 6 (concerning payment of redevelopment costs) be revised so that (a) payment of relocation costs is an obligation of the mobile home park owner or redeveloper, (b) payment of actual relocation costs be capped at $6,000 for a single-wide and $8,000 for a double-wide, (c) the mobile home park owner be required to pay full (rather than half) of the actual value of the home (as determined by the County Assessor) if it cannot be relocated due to its poor structural condition, and (d) the obligation to pay relocation or unit purchase costs apply regardless
of whether the redevelopment project involved City financial assistance or a discretionary land use decision by the City. Only AHB recommendation (b) was incorporated into this document.

- The results of the on-line survey included the following:
  - 45 persons completed the survey. Of that number 35.5% were residents of a mobile home park (all but one were unit owners); 22.6% were owners or managers of mobile home parks; the rest were either residents of affordable housing units, employees of affordable housing organizations, or “other.”
  - 69.9% were residents of Fort Collins, and 41.1% had lived in Fort Collins for over 10 years.
  - 84.2% of survey respondents indicated they had read the Draft Strategy.
  - Support and opposition to each of the proposed strategies varied significantly. For purposes of this summary, responses of “support” or “strongly support” are combined, as are “oppose” and “strongly oppose.”
    - 76.7% support creating a loan or grant program available for reinvestment in water, sewer, and road infrastructure for mobile home parks that agree to continue in operation for a period of time; 102% oppose; and 13.3% were neutral.
    - 66.6% support continuing to offer relocation assistance when redevelopment projects use public (federal, URA, or City) funds, but not extending that duty to private redevelopment projects that do not use public funds and do not require a discretionary land use decision by the City; 23.4% oppose; and 10.0% were neutral.
    - 64.5% support continued efforts to expand the inventory of affordable housing units in Fort Collins through existing programs; 16.2% oppose; and 19.4% were neutral.
    - 50% support creation of a Manufactured Home Park District that would limit options for redevelopment of existing parks without City Council approval; 43.4 oppose; and 6.7% were neutral.
    - 46.6% support a requirement that redevelopments projects with City involvement should be required to pay mobile home relocation costs within 25 miles, to pay market value of homes that cannot be moved because no spaces are available, and to pay 50% of the market value of homes that cannot be moved due to structural condition; 40% oppose; and 13.3 were neutral.
    - 43.3% support requiring a one-year notice of closure (rather than the state minimum six month notice), but allowing a six month notice of the mobile home park owner gives each resident a relocation report identifying available spaces within 25 miles; 60% oppose; and 6.7% were neutral.
    - 46.7% support building the capacity of homeowner groups, non-profits, and support organization to purchase mobile home parks and manage them as affordable housing. 30.0% oppose; and 23.3% were neutral.
VI. STABILIZATION TECHNIQUES

There are numerous steps that the City of Fort Collins could take to either (a) discourage the redevelopment of existing affordable housing units (either rental complexes or mobile home parks) in ways that would dislocate the current residents, or (b) assist in the relocation of residents when affordable housing units are redeveloped, or (c) both. Before outlining these options, however, it is important to clarify that these options would apply only when the proposed redevelopment of affordable housing units does not involve funding from either the federal government or the Fort Collins Urban Renewal Authority (FCURA).

- When federal funds are involved in a redevelopment project, the City is obligated to provide assistance outlined in the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (the “Federal Uniform Relocation Act” or “FURA”). That assistance includes a minimum 90 day notice prior to displacement, provision of relocation advisory services, payment of moving expenses, and payments for the added costs of renting or purchasing adequate replacement housing. Additional provisions apply if federal funds are used to acquire real estate (not just supporting its redevelopment).

- When the Fort Collins Urban Renewal Authority (FCURA) assists in redevelopment, its relocation policies would apply. The FCURA recently updated its relocation assistance policies and decided to follow the requirements of the FURA in most major respects, with one exception: FCURA established a $50,000 cap on moving expenses for business relocations.9

Because these two situations are covered by existing policies and legal requirements, this strategic plan document focuses on situations in which redevelopment is being completed either (a) privately, without any financial involvement by the City or (b) with City involvement using non-FCURA assistance. Different policies may be needed in these two situations.

Options for mitigating the impacts of dislocation through the redevelopment of affordable rentals and mobile home parks can generally be categorized as either (a) strategies to discourage or prevent the dislocation (which generally means reducing opportunities for redevelopment), or (b) strategies to mitigate the impacts of dislocation when it occurs. Each of these is discussed separately.

A. OPTIONS TO DISCOURAGE THE LOSS OF AFFORDABLE HOUSING

The first set of options involve discouraging the loss of affordable housing units by discouraging the redevelopment of the property or by requiring that any redevelopment project incorporate replacement affordable housing. It is important to note that there is no parallel to these options in either the FURA or the modified version of the FURA policies.

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9 The Fort Collins Urban Renewal Authority is currently considering narrowing its relocation assistance policies to apply only when there is an eminent domain/condemnation action by the URA. This policy change would have a significant impact on mobile/manufactured homeowners, since they do not own the land that is the subject of the condemnation action and generally do not participate in the negotiations. This represents a departure from federal Uniform Relocation Act requirements followed by the Fort Collins URA in the past, which were designed to protect renters in these types of situations.
adopted by the Fort Collins Urban Renewal Authority (FCURA). Those policies and requirements only address relocation assistance when the dislocation of residents occurs.

1. **Affordable Rental Units**

   Two main categories of affordable rental units (generally, apartments) exist in Fort Collins:
   
   - Designated affordable units; and
   - Market rate units.

   Strategies to discourage the loss of affordable rental units for each category are discussed below.

   **Designated Affordable Units**

   Designated affordable units receive some form of public assistance or benefit (e.g., LIHTCs or grant funding) in exchange for maintaining a commitment to affordability. The City works with its partners in affordable housing, including private developers, nonprofit affordable housing providers, the Fort Collins Housing Authority, and financial institutions to maintain the supply of designated affordable rental units in the community.

   The *Affordable Housing Strategic Plan 2010-2014* establishes goals and strategies for affordable housing in Fort Collins, with an emphasis on designated affordable units. The strategic plan identifies four goals: (1) Increase the inventory of affordable rental housing units, (2) Preserve existing affordable housing units, (3) Increase housing and facilities for people with special needs, and (4) Provide financial assistance for first-time homebuyers.

   As discussed in the *Affordable Housing Strategic Plan*, the City employs an array of financial resources including federal grants (Community Development Block Grant [CDBG] and Home Investment Partnership Grant [HOME]), the City’s Affordable Housing Fund (AHF), Private Activity Bond (PAB) financing, and development incentives to preserve and increase the inventory of designated affordable rental housing units. If federal funds or the FCURA are involved with any redevelopment project impacting designated affordable rental units, the FURA requirements would apply.

   On the other hand, if federal funds or the FCURA are not involved with a redevelopment project that affects designated affordable rental units, then the terms of the rental lease would apply (pursuant to Colorado Rental Agreement Laws). While there may be concern about the long-term loss of designated affordable units, data shows that while some designated affordable rental units may be lost any given year (due to closure, the expiration of tax credits or rent limits, or other factors), the overall inventory of designated affordable rental units continues to increase, with new and/or rehabilitated units added each year. Moreover, the City and its partner affordable housing agencies are typically aware of potential redevelopment or expiration of designated affordable units, and because their missions are to provide affordable housing, they have worked to find creative solutions long before those situations affect residents. That collaborative approach, along with continued implementation of the strategies identified in the
Affordable Housing Strategic Plan will likely help the City achieve its goals related to preserving existing and increasing the inventory of designated affordable rental units.

Market Rate Units

In addition to designated affordable rental units, there are many other market rate units that do not receive public assistance or tax credits but that provide unofficial "affordable housing" to lower income households. If federal funds or the FCURA are not involved with a redevelopment project impacting market rate rental units, then the terms of the rental lease would apply (pursuant to Colorado Rental Agreement Laws). Because rental rates in these units vary with market demand, different (generally apartment) buildings and complexes can fluctuate in and out of the "affordable" category over time. In addition, individual units within a building (for example, basement, smaller units, or poorly located units) may move in and out of the "affordable" category within a single building or complex. Because of the difficulty of identifying which units are "affordable" in any given year, because that inventory changes from year to year, and because it is difficult to develop tools that would preserve individual "affordable" units (rather than a building or complex) from redevelopment, the City's affordable housing strategy has not targeted market rate units for preservation except through designating the building or complex for assistance through the "designated affordable" tools discussed above, and this strategic plan recommends no change to that policy. However, recommendations 1 and 7 could result in some of these market rate buildings being acquired by affordable housing entities through voluntary transactions and then added to the City's "designated affordable" housing stock.

2. Mobile Home Parks

At the outset, it is clear that any strategy to discourage or prevent the relocation of existing mobile home parks must acknowledge the wide range of size, location, infrastructure quality, and long-term housing potential of different parks, as well as the City's plans for the area in which the park is located. On one hand, there are several large mobile home parks that have good water and sewer infrastructure and are located in areas of Fort Collins not targeted for redevelopment. On the other hand, some of the parks have a limited number of spaces (e.g., 5 to 15 spaces), have aging water and sewer lines (or only septic systems), and/or are located in areas of Fort Collins designated for redevelopment.

As a result, any redevelopment displacement mitigation strategies should include a different mix of tools depending on (1) the number of affordable housing units at risk, (2) the amount of infrastructure investment (if any) required to keep the park as a viable source of housing over the mid- to long-term, and (3) the location of the park in a targeted redevelopment area (if any). This strategic plan recommends that the mitigation strategies be organized around a three-tier approach:

- **Tier 1 – Zoning for Preservation**, which would generally be applied to those mobile home parks that contain a relatively large number of mobile/manufactured home spaces (e.g., over 50) and could serve as a significant source of affordable housing over the mid- to- long term, that do not require significant investment to install or replace water and sewer infrastructure, and where there have been significant park
and home owner investments based on its future use as a mobile home park, regardless of whether they are located in a targeted redevelopment area.

- **Tier 2 – Financial Assistance for Preservation**, which would generally be available to the owners of those mobile home parks that contain a relatively large number of mobile home spaces (over 50), but that may require significant investment in infrastructure in order to remain viable, whether or not they are located in targeted redevelopment areas.

- **Tier 3 – Resident Relocation Assistance**, which would be required of all redevelopment projects with City involvement that result in the displacement of residents from a mobile home park.

**Option 1: Rezoning to a Manufactured/Mobile Home Park District**

Some local governments create a zoning district specifically designed for mobile home parks. These districts are usually applied to existing parks in order to help preserve them, but they are also available for the creation of new mobile home parks. These districts permit only mobile/manufactured home residences and uses closely related to the operation of the park (e.g., clubhouses and pools), and include the same types of layout, circulation, and utility service standards discussed above. Although a number of alternative uses of the property are often listed to allow the owner flexibility, major commercial and residential uses are generally not allowed. The amount of flexibility for alternative uses is generally tailored—and may in some cases involve options to redevelop portions of the property if the remainder is preserved as a park.

For example, Snohomish County, WA, has created a Mobile Home Park zone district that allows:

- **As Permitted Uses**: Agriculture, boarding house, clubhouse, community club, community facility for juveniles, mobile/manufactured home dwelling, single-family dwelling, family day care home, foster home, guesthouse, Level 1 health or social service facility, mobile home park, retirement apartments, retirement housing, small personal storage, and swimming pool.

- **As Conditional Uses**: Bed and breakfast guest house, Level 2 or 3 health or social service facility, personal wireless communication facility, recreational vehicle park, large personal storage, and primary use utilities.

- **As Accessory Uses**: Day care center, garage, home occupation, small personal storage facility, and support utilities.10

Until 1997 the City of Fort Collins land development regulations contained two similar districts, the M-L Low Density Mobile Home Park district and the M-M Medium Density Mobile Home Park district. A copy of the M-M district is attached to this document for reference.

In contrast, Fort Collins’ current LMN zoning district (where most of the mobile home parks are located) allows a broader range of redevelopment uses subject only to

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10 The cities of Lynnwood, Marysville, and Tumwater, Washington, have adopted similar ordinances.
administrative review, including multi-family dwellings, public and private schools and universities, retail stores, offices, and financial services. The impact of rezoning (downzoning) some of the existing mobile home parks into a new and more restricted manufactured/mobile home park district would limit owners to a narrower range of options for redevelopment of the property. A rezoning from a more restricted manufactured/mobile home park district to a zone that permits a wider range of land uses is always a future possibility for the property owner, but any such rezoning would require approval from the City Council.

This option could only apply in the short run to those mobile home parks located within the boundaries of Fort Collins. However, the City could adopt a policy listing the names or types of mobile home parks located within the GMA to which it intends to apply this tool upon annexation or application for redevelopment, which could have the effect of discouraging applications for annexation and redevelopment for other uses. In addition, Larimer County could adopt a similar district for use in the unincorporated areas of the county.

While these types of ordinances are sometimes legally challenged as “ takings” of private property rights, they have generally been upheld by the courts because they leave the property owner with a “reasonable economic use” of the property, especially if that use is a mobile home park that has existed on the property for many years. Most recently, the U.S. 9th Circuit Court of Appeals upheld a challenge to a mobile home park ordinance similar to the Snohomish County ordinance in Laurel Park Community, LLC v. City of Tumwater. 11

Option 2: Incentives to Preserve or Improve the Mobile Home Park

A second alternative is to offer mobile home park owners financial incentives in return for agreements to keep the park in operation for a period of years. 12 For example, some local governments offer grants or loans to mobile home park owners to invest in infrastructure maintenance and upgrades as a way to stabilize and support mobile home communities. Grants or loans are sometimes made available to pave (or repave) roadways, upgrade water and/or sewer systems, replace failing septic systems, improve site drainage, or to make other improvements that would prolong the useful life of the mobile home park and/or reduce threats to public health and safety within the park.

City financial assistance for infrastructure replacement could be made available from the federal CDBG and/or HOME Programs or the City’s Affordable Housing Fund (AHF), and those funds could be used to leverage additional private financing to cover project costs and to keep lot rents affordable. Applications to use the City’s AHF for this purpose would, of course, need to compete with other proposals through a competitive process, and would need to contain commitments from the park owner to keep at least a portion of the lot rentals affordable to low income families for a defined length of time. The City’s Affordable Housing Strategic Plan 2010-2014 also contains an implementation action

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12 Chapter 18 of the Code of the City of Fort Collins contains regulations and standards for mobile home parks and mobile homes in the city limits. These regulations include park maintenance requirements for utilities including electric, water, sewer, and gas, as well as trash removal.
item to investigate the establishment of a permanent funding source for the AHF, which would enhance its value as a potential source of future funding for infrastructure improvements and mobile home park purchases.

The available information on potential infrastructure investments needed to keep the existing parks viable suggest that only 2 of the 14 mobile home parks located within Fort Collins, with a combined 311 mobile/manufactured homes, have a likely need to invest in on-site infrastructure improvements (sewer). While 4 of the parks located in the City limits currently have dirt roads that may need to be upgraded and paved, all of those are small parks (under 25 units) where the potential for preserving significant amounts of affordable housing is likewise small. In addition, failure to upgrade substandard roads would seldom lead to the closure of a mobile home park, while failure to upgrade sewer or septic systems could lead to health risks that force the closure of the park. Two of the 7 mobile home parks located contiguous to the City boundaries, with a combined 613 mobile/manufactured homes, may need investments in either storm or sanitary sewer infrastructure. While more detailed information is certainly needed, the data above suggests that infrastructure-based incentives based on assistance in upgrading sewer infrastructure might have larger impacts in preserving mobile home parks that are located on parcels contiguous to the City boundaries (when and if they apply for redevelopment) than in preserving mobile home parks within the City boundaries.

As an alternative example, Bend, OR, has adopted a Manufactured Park Redevelopment Overlay Zone that offers existing manufactured home parks several incentives if the redevelopment preserves all or part of the existing mobile home spaces. For example, Bend offers increased density, allowance to remove up to 10% of otherwise-protected trees if necessary to accommodate increased density, and additional building height if necessary to increase the number of affordable units in the redeveloped park and to avoid tree removal. If surrounding properties are developed at higher densities, then the redevelopment may also include some neighborhood-scale commercial uses if they can be served from an existing street. To reduce impacts on surrounding residential properties, setbacks and lot sizes within 100 feet of the property perimeter must match or exceed those of the adjacent residential development. Interestingly, if the redeveloped park accepts manufactured homes from other (closing) mobile home parks that need a place to relocate, the owners will not in the future be responsible for providing relocation benefits to those relocated tenants if their park later closes.

In practice, redevelopment incentives such as those in Bend, OR, could be combined with a Manufactured Home Park zoning district. For example, the Manufactured Home Park district could offer additional options for non-residential development if the redevelopment proposal includes affordable residential units.

Obviously, many different types of incentives could be offered in return for preservation of a mobile home park or redevelopment that incorporates mobile/manufactured home spaces or affordable housing for existing residents. However, incentives only constitute an effective mitigation strategy if they are in fact valuable to the mobile home park owners and/or redeveloper. In practice, this means they need to be more valuable than the returns that can be achieved by selling the park for redevelopment with more valuable uses.
This type of incentive approach would only apply to those 14 parks located within Fort Collins – at least until such time as those parks located contiguous to the City boundary apply for annexation. However, Larimer County could decide to offer identical or similar incentives to the 7 parks along the Fort Collins boundary or the 10 parks located elsewhere in the GMA if it wished.

Option 3: Right of Current Residents to Purchase the Park

Some states and local governments provide mobile/manufactured homeowners a “first right of refusal” to buy the mobile home park from the owner at a reasonable price if the owner intends to sell the park. Several variations of requirement can also be found. In Malibu, CA, for example, the home owners are given the right to match the final market offer on the mobile home park before the property owner may accept that offer (i.e., a “right of last offer”). Typically, this right only applies to mobile home owners that are organized into a recognized homeowners’ association registered with the state that can obtain financing as the purchasing entity. As an alternative, a right of first refusal could be granted to a housing authority or a non-profit affordable housing entity that agrees to allow the mobile/manufactured homes to remain in the park at affordable land rent rates. The right does not usually apply to individuals or groups of individuals who are park residents, but who are not members of an approved homeowners association. Ownership of the park itself grants a very high level of security to the residents that they will not be dislocated in the future without their consent.

Of course, the right to purchase a mobile home park will not significantly reduce dislocation of the residents unless they are willing and able to complete the purchase, and that requires both organization and financing. States that want to encourage this outcome have generally developed some level of financial assistance to help mobile/manufactured home owners in this effort. For example, the State of Washington established a $4 million statewide fund that can provide at least partial financing for those purchases. Rhode Island exempts sales of mobile home parks to residents’ associations from tax on the sale, and Washington does the same for sales to homeowners’ associations, housing authorities, or non-profit housing agencies.

In addition, a national non-profit organization named Resident Owned Communities USA (ROC USA) has assisted numerous mobile/manufactured homeowners to organize and purchase their parks. The New Hampshire Community Loan Fund, the precursor to ROC USA, has helped with the conversion of more than 100 mobile home park communities to resident ownership. To date, none of those resident-owned communities has defaulted on loans that enabled it to purchase the park. ROC USA has certified technical assistance providers across the country who are available to assist home owners with the purchase of their community and ROC USA can also help with the financing. Without these forms of organizational or financial assistance, however, it is doubtful that a right-of-first refusal will act as a significant disincentive to redevelopment of the mobile home park, since the value of mobile home park land for an alternative multi-family or commercial use may well exceed its value as a mobile home park, and thus exceed the value of any offer that even organized residents can make to purchase the park.
While the State of Colorado does not currently grant this right to mobile/manufactured home owners associations, this could be an area for potential changes to state law. For example, state law could be amended to require that mobile home park owners grant their tenants or non-profit affordable housing entities a right of first refusal or by requiring a delay (for example, 90 days) before closing of a sale to a third party to allow time for negotiation with the owners or a third party, such as a land trust, to offer a competitive sale price. Again, Fort Collins would only have the ability to impose this requirement on the 14 parks within its boundaries until such time as the owners of other parks along the City limits decide to annex.

**Option 4: Encouraging Purchase of the Park by a Third Party**

In addition, or as an alternative, Fort Collins could establish a process to encourage sale of existing mobile home parks to a non-profit housing provider or land trust committed to managing the property as a source of affordable housing. For example, when the Mapleton Mobile Home Park in Boulder was threatened with redevelopment and dislocation of its residents, the City of Boulder was able to encourage purchase of the park by the Thistle Communities Land Trust in order to preserve it as a mobile home park. In Fort Collins, Funding Partners is aware of this technique and could potentially offer financing for a non-profit housing entity to purchase an existing mobile home park.

**Option 5: Encourage the Creation of New Mobile Home Parks**

Finally, Fort Collins could encourage the creation of new mobile home parks, both as an efficient source of affordable housing and to increase the number of mobile home sites available for potential relocation from existing mobile home parks when they redevelop. This could be done through a partnership with housing developers, both private and non-profit agencies, and/or the use of the City’s Land Bank Program properties. While not reducing the costs of moving a mobile/manufactured home, the availability of more park spaces could reduce instances where homes cannot be moved simply because there are no spaces available.

**B. OPTIONS TO MITIGATE THE IMPACTS OF DISLOCATION FROM AFFORDABLE HOUSING**

Whether or not Fort Collins decides to implement any of the tools discussed in section VI.a above to discourage redevelopment of affordable housing units in ways that would dislocate the residents, it may want to consider assisting affordable apartment renters or mobile/ manufactured home owners when dislocation occurs.

1. **Affordable Rental Units**

In evaluating options for relocation assistance for those displaced from affordable housing units, it is important to realize that the City’s *Affordable Housing Strategic Plan’s* four goals and strategies for affordable housing in Fort Collins do not include providing relocation assistance to individual households dislocated by redevelopment. It is also helpful to distinguish between the different situations.
• **First**, as noted above, when federal funds or FCURA funds are involved in the redevelopment of affordable rental units, some version of the FURA requirements will apply, and relocation assistance will be available. This strategic plan need not address those situations in any further detail.

• **Second**, when federal and FCURA funds are not involved, but other City funds are used to support the redevelopment, or when the redeveloper requires a discretionary land use decision from the City (such as a rezoning or approval of a Project Development Plan), the City could require that the property owner/redeveloper pay relocation/moving expenses (up to a cap) in order to assist lower income residents with the financial burden of relocating to other units in a different building or complex. If that course is taken, it is likely that some or all of those relocation expenses will be considered expenses of the redevelopment project itself. As a result, the redevelopment project costs will potentially increase, the gap between the developer’s available financing and project costs may increase, and the amount of assistance requested from the City may also increase. This is not always the case, however, and in some situations a potential redeveloper will be able to absorb the relocation assistance costs (or the increased private financing may be able to cover those costs) without increasing its request for City assistance.

• **Third**, when a designated affordable housing project is redeveloped—regardless of whether federal or FCURA funds are involved, the non-profit entity owning or managing that project almost inevitably provides relocation assistance as part of its mission or operating procedures, because failure to do so would undermine its affordable housing mission.

**Fourth**, when market rate housing projects are financed without any federal, FCURA, or City financial assistance (a private project), and without the need for a discretionary land use approval by the City, it would be relatively difficult to impose an obligation to pay relocation expenses on the redeveloper. While many forms of redevelopment may require administrative, Planning and Zoning Board, or City Council approval, the criteria governing those decisions generally involves land use impacts on surrounding areas (not the impacts on past or future project residents). If relocation costs were to be imposed on private redevelopers, the information required for those approvals would have to be revised to include information on the rental rates of individual apartments and/or the incomes of renters in those apartments in order to target relocation assistance to lower income households. And since there may be “affordable” units or lower income households in any apartment (or other residential) building or complex seeking redevelopment approval, this additional level of information would need to be required for all redevelopments of existing housing projects. Finally, either the redeveloper or a financial institution would have to cover the relocation assistance costs, which would increase the costs of redevelopment (although the amount of increase would likely be small compared to the costs of the redevelopment). For all of these reasons, this strategic plan does not recommend that the City impose relocation assistance requirements on private redevelopments that do not involve City, FCURA, or federal funds and do not require a discretionary land use approval from the City.
2. Mobile Home Parks

**Option 1: Additional Notice of Closure**

Colorado law currently requires that owners of mobile home parks provide their residents at least six months’ notice before closing the park or redeveloping it for another purpose. Length of closure notice requirements in some other states are summarized in the table below.

<table>
<thead>
<tr>
<th>State</th>
<th>Notice of Closure Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>MA</td>
<td>24 Months</td>
</tr>
<tr>
<td>CT</td>
<td>± 19 Months (565 Days)</td>
</tr>
<tr>
<td>NH</td>
<td>18 Months</td>
</tr>
<tr>
<td>DE, IL, NJ, OR, RI, WA</td>
<td>12 Months</td>
</tr>
<tr>
<td>AK, MN, UT</td>
<td>9 Months</td>
</tr>
<tr>
<td>AZ, CA, CO, MT, ND, OH</td>
<td>6 Months</td>
</tr>
<tr>
<td>Others</td>
<td>None</td>
</tr>
</tbody>
</table>

Although there are many variations of this requirement, CA and CO laws require notice to the homeowner, UT requires notice to the resident (regardless of whether or not they are the unit owner), and AZ, OR, WA, and ME require notice to the tenant. The purpose is two-fold: First, to give the recipient of the notice a fair opportunity to participate in any local approval process for the proposed redevelopment; and second, to provide adequate time for the home owner, resident, or tenant to find new housing in case the proposed redevelopment is approved. In UT, CA, OR, and WA, the park owner is prohibited from raising the rent on tenants during the notice period.

In practice, it is often difficult for mobile/manufactured homeowners to find a mobile home park within a reasonable distance of their job to which the mobile/manufactured home can be moved. This is particularly true if the unit is a pre-1976 mobile home (which many parks and local governments will not accept). For that reason, several states require more than 6 months’ notice of closure, and one option would be for Fort Collins to increase the required notice of closure to 9 or 12 months. There is no indication that the Colorado General Assembly was attempting to pre-empt this field of law or to prohibit local governments (particularly home rule cities) from enacting notice periods longer than 6 months.

**Option 2: Require a Relocation Report**

A second option would be for Fort Collins to require the mobile home park owner to produce a relocation report well in advance of park closure. The cities of Kent, WA, and Eugene, OR, require a relocation report that includes information such as: the number of residents to be displaced, an inventory of mobile/manufactured home spaces available...
within a certain distance (e.g. 25 miles) of the park, rent schedules for those spaces, the assistance that the park owner will provide to help relocate the residents, and other resources from which residents can get financial, legal, and logistical help. The report must generally be approved by the local government, sometimes after a public hearing, and a copy of the report must be provided to each resident in the park. In Kent, WA, that report must be completed and approved before the park owner may give the mandatory 12 month notice of park closure.

Option 3: Require Payment of Relocation Costs

A third option would be for the City to require mobile home park owners or redevelopers to pay some or all of the costs of relocating mobile/Manufactured homes when a park is closed or redeveloped. When payment of relocation costs is required, they are generally required to cover, but not exceed, the reasonable amount needed to relocate displaced park residents to a location of equal quality. In some cases, such as Santa Barbara County, CA, and Wilsonville, OR, the relocation amount is determined on a case-by-case basis, but in other cases it is set or capped by state statute (AZ, WA, OR), or a lump sum payment is required by the local government. The table below summarizes some of the known relocation payment provisions.

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Ground-set or Triple-wide</th>
<th>Double-wide</th>
<th>Single-wide</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>AZ</td>
<td>$12,500</td>
<td>$10,000</td>
<td>$5,000</td>
<td></td>
</tr>
<tr>
<td>WA</td>
<td>$12,000</td>
<td>$7,500</td>
<td></td>
<td>Funded by statewide $100 title transfer fee on units over $5,000 in value</td>
</tr>
<tr>
<td>CT</td>
<td>$10,000 for all</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OR</td>
<td>$9,000</td>
<td>$7,000</td>
<td>$5,000</td>
<td></td>
</tr>
<tr>
<td>MN</td>
<td>$8,000</td>
<td>$4,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RI</td>
<td>$4,000 for all</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FL</td>
<td>$3,750</td>
<td>$2,750</td>
<td></td>
<td>From state fund collected from park owners who change their use of land</td>
</tr>
<tr>
<td>MA</td>
<td>Actual relocation cost or appraised value of the home</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MD</td>
<td>10 months site rent for all</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NV</td>
<td>Actual costs for move up to 150 miles</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DE</td>
<td>Maximum cost set by state fund</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NJ</td>
<td>Only requires payments in special circumstances</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eugene, OR</td>
<td>$21,000</td>
<td>$17,000</td>
<td>$11,000</td>
<td>OR actual cost of move up to 60 miles OR market value of unit that cannot be moved plus flat fee for moving personal property</td>
</tr>
</tbody>
</table>
### Relocation Cost Payment Requirements

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Ground-set or Triple-wide</th>
<th>Double-wide</th>
<th>Single-wide</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wilsonville, OR</td>
<td>Actual costs of move up to 100 miles OR market value of unit that cannot be moved</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Santa Barbara County, CA</td>
<td>Determined on a case-by-case basis, but includes increased rent in new location for 12 months</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The definition of “actual expenses” differs by state or community, but is sometimes defined to include not only the costs paid to the mobile/manufactured home moving company but also return of damage deposits, return/payment of first/last month’s rent (so the homeowner may use those funds to pay similar costs at the new location), utility re-connection fees at the new location, and temporary housing during the time the mobile/manufactured home is in transit.

Based on inquiries to two mobile/manufactured home moving companies in Colorado, it appears that the costs to move a single-wide mobile/manufactured home range from $3,500-$4,000, and costs for moving a double-wide can range from $7,500-$8,000 for short distance relocations, but both companies indicated costs could be higher based on individual circumstances and the difficulty of moving the unit. A review of relocation expenses paid to 13 mobile/manufactured home owners at the time the Bender Mobile Home Park was redeveloped shows that 12 of them provided expenses invoices equaling or exceeding the $2,000 maximum relocation payment made available to them from the City of Fort Collins.

While relocation payments are of significant value to park residents who are dislocated, it is unclear who will bear those costs in the end. Experience suggests that many mobile home park owners do not raise rents in an attempt to recoup those expenses but instead attempt to have those costs covered by the purchaser of the mobile home park land when redevelopment occurs. However, if demand for mobile/manufactured home spaces is high and vacancy rates are low, it is possible that some mobile/manufactured home park space rents could rise. To avoid the risk of having relocation costs passed on through higher site rents, the State of Washington currently funds its relocation fund through a statewide $100 transfer charge on all sales of mobile/manufactured homes located in mobile home parks. The planning team contacted mobile/manufactured home park insurers to determine whether mobile home park owners or mobile/manufactured home owners could purchase insurance to cover relocation costs in the event a mobile home park is closed, but were told that type of coverage is not available.

### Option 4: Require Payment of Increased Rental Costs

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13 Although the Colorado constitution currently prohibits the imposition of real estate transfer fees by local governments, mobile home units are not currently titled or taxed as real estate, so this option might be available.
A few local governments require that—in addition to relocation costs—the mobile home park owner or redeveloper pay any costs of increased mobile/manufactured home space rent that the relocated resident experiences for a period of time. As noted above, Santa Barbara County, CA, requires that type of assistance for 12 months. The federal Uniform Relocation Act (FURA) and the modified version of those requirements endorsed by the Fort Collins Urban Renewal Authority (FCURA) generally require payment of additional rent for a period of 42-48 months.

C. TRIGGERS AND EXCEPTIONS

If Fort Collins decides to pursue any of the options outlined in Section VI.A (to decrease the loss of affordable housing) and VI.B (to mitigate the impacts of dislocation) above, two of the key questions to be answered are:

- What redevelopment projects would be subject to these new requirements (i.e. what are the “triggers” for the application of the new requirements)? and

- Should some forms of development or redevelopment be exempt from these requirements?

- As noted above, this document addresses potential mitigation strategies when closure and redevelopment of an affordable housing project or mobile home park does not involve federal or Fort Collins Urban Renewal Authority financial assistance, since those are covered by existing legal requirements and policies. Even in this case, however, the City may want to distinguish between cases in which (a) the property owner or redeveloper is proposing redevelopment that does not involve any City financial assistance or a discretionary land use decision (a “private redevelopment”), or (b) the property owner or redeveloper is applying for City funds or requires a discretionary land use approval (a “City supported redevelopment”). City-supported redevelopment might include projects that request: Financial assistance from the City for the use of Affordable Housing Fund (AHF) dollars;

- Rezoning to foster a redevelopment activity; or

- Approval of an Overall Development Plan (ODP) or Project Development Plan (PDP).

Based on the distinction between private redevelopment and City-supported redevelopment, three potential “trigger” options are:

- **Trigger Option 1**: The mitigation strategies apply to City-supported redevelopment, but not to private redevelopment;

- **Trigger Option 2**: The mitigation strategies to discourage redevelopment apply only to City-supported redevelopment, but the strategies to offer relocation assistance apply to all redevelopment; and

- **Trigger Option 3**: The mitigation strategies apply to both City-sponsored and private redevelopment.

We recommend that Trigger Option 1 be adopted, with one exception. If the City decides to proceed with the creation of a manufactured home park zoning district, it should do so in
advance of specific applications for redevelopment or requests for financial assistance in order to allow the owners of the parks that are rezoned into that new district to plan for future management and investment in light of the more limited redevelopment options available to them.

For those mobile home parks located outside the boundaries of Fort Collins, the most logical "trigger" would be a petition for annexation (whether for redevelopment, as required by the Fort Collins-Larimer County UGA Agreement, or otherwise). In other words, the City would adopt a policy that any annexation of land containing an income-restricted rental property or a mobile home park would – through the terms of an annexation agreement – be subject to the same mitigation strategies applicable to other Fort Collins properties in the same "Tier" of affordable housing potential (see discussion in Section VII b. below).

Most redevelopment projects produce significant benefits for Fort Collins – whether in increased sales and property tax, or by removing blighted or underused properties, or by generating jobs or employment – so it is always wise to consider whether some types of redevelopment should be exempted from these mitigation strategies because they produce benefits to the City that offset (or more than offset) the costs they impose on current residents of the property. Because the purpose of this strategic plan is to reduce the adverse impacts of redevelopment on affordable housing residents, however, this document only considers whether these mitigation strategies should not apply to redevelopment that creates more affordable housing than it removes.

The planning team recommends that redevelopment projects creating new affordable housing not be exempted from the mitigation strategies for mobile/manufactured homeowners recommended in this document, because the creation of new affordable housing does not address the unique challenges facing mobile/manufactured homeowners. More specifically, projects that result in a net increase in affordable rental units in Fort Collins still leave mobile/manufactured homeowners with the prospects of moving their mobile/manufactured home at significant expense or (if they cannot find an alternative space or the unit cannot be moved) abandoning the home on-site and losing the value of that asset. In other words, the unique nature of mobile/manufactured homes as an owned housing asset means that it is not fungible with other forms of affordable housing. Rather than exempting affordable housing redevelopment projects from these requirements, the costs involved in implementing the recommended mitigation strategies should be integrated into the costs of the proposed redevelopment.
### D. SUMMARY TABLE

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Potential Benefits</th>
<th>Potential Challenges</th>
</tr>
</thead>
</table>
| Tools to discourage redevelopment of affordable units not in “designated affordable” developments | • Preservation of additional affordable housing units beyond those in designated affordable buildings or complexes | • Commingling of affordable and non-affordable units in a single building or project  
• Individual units move in and out of affordable category with market forces  
• Existing programs focus on management of entire buildings or complexes (as “designated affordable”), not individual units within larger complexes |
| Manufactured Home Park Zone District                 | • Effective in preserving existing mobile home parks with long term potential        | • May run counter to long-term redevelopment goals for surrounding area                
• Adds land use predictability                                                                      | • Requires significant organization and probably financial support for homeowners association  
• Value as a mobile home park may be significantly lower than value for other uses, making it difficult to arrange financing for a competitive offer |
| Incentives to preserve or improve mobile home park   | • Property owner free to accept or reject the incentive                            | • Few larger parks within the city appear to need extensive investments               
• Could alter economics of park operation enough to extend life of the park                                       
• Could influence redevelopment plan to include more affordable housing                                   | to stay in operation  
• Need to identify a source of funding for incentives                                                     | • Requires significant organization and probably financial support for homeowners association  
• Value as a mobile home park may be significantly lower than value for other uses, making it difficult to arrange financing for a competitive offer |
<p>| Right of current residents to purchase the park (first right of refusal)                              | • Occupant ownership provides long-term stability for affordable units              |                                                                                       |</p>
<table>
<thead>
<tr>
<th>Strategy</th>
<th>Potential Benefits</th>
<th>Potential Challenges</th>
</tr>
</thead>
</table>
| Encourage the creation of new mobile home parks | • Efficient source of affordable housing  
• Increase the number of mobile home sites available | • May be difficult to find suitable properties (e.g., adequate size, utilities, access, etc.)  
• Could face resistance from nearby property owners |

**Options to Mitigate the Impacts of Dislocation from Affordable Housing**

| Require private apartment redevelopers to pay relocation costs | • Reduces burden of relocation on lower income households | • Would require collection of significant additional information to determine which residents are eligible for assistance  
• May slightly increase redevelopment costs |
| Require longer notice of closure for mobile home parks | • Provides added time for residents to find replacement housing | • May delay development projects that could have proceeded earlier but for the notice period |
| Require a relocation report for mobile home parks | • Provides mobile/manufactured home unit owners information about alternative housing options | • Cost of researching and preparing the report |
| Require payment of mobile/manufactured home moving expenses or purchase of mobile/manufactured home at assessed value if move is impossible | • Addresses unique challenge of mobile/manufactured home ownership – investment in an asset whose value could otherwise be lost or seriously reduced  
• Recognizes that many mobile/manufactured homes are not in fact mobile due to age, deterioration, or lack of available spaces to relocate them | • Increases redevelopment costs  
• Requires mobile home park owners to operate a park with increasing vacancy rates (as residents move out) over a longer period of time.  
• May be passed on in increased rents to mobile home park tenants when redevelopment is anticipated and market forces will support those higher rents  
• May be paid by redeveloper, but that may increase amounts of City assistance required for the redevelopment or (if no City assistance is required) could affect viability and timing of redevelopment. |
| Require payment of increased rent in new housing location | • Addresses costs of relocation other than moving expenses | • Increases costs of redevelopment  
• Likely to be passed on in increased rents to mobile home park tenants when redevelopment is anticipated and market forces will support those higher rents |
VII. RECOMMENDATIONS

A. GENERAL

For the reasons outlined in sections I through VI above, the planning team recommends that the City of Fort Collins take the following steps to both (a) discourage the loss of current affordable rental units and mobile home parks and (b) reduce the financial burden on lower income households when dislocation from affordable units and mobile home parks occurs.

1. Continue to expand the inventory of “designated affordable” dwelling units, buildings, and complexes through current programs administered by the Fort Collins Housing Authority, other non-profit affordable housing agencies, and private developers; but do not attempt to delay or prevent the redevelopment of market rate rental buildings or complexes that have not received government assistance because of the administrative difficulty of identifying and protecting individual affordable units to be protected and the fluctuation of the affordability of those units with market forces.

2. Continue to offer relocation assistance to those residents of affordable units redeveloped with the use of federal, FCURA, or City funds, but do not extend a requirement to pay relocation expenses in private redevelopment projects that do not use public funds and do not require a discretionary land use decision by the City because of the significant additional administrative burden of identifying those eligible for relocation assistance each time residential units are proposed for private redevelopment.

3. Draft a Manufactured Home Park Zoning District and rezone into that district those mobile home parks that are relatively large and can serve as significant sources of affordable housing for the long term without the need for significant infrastructure investment, as identified in subsection VII.B below. This district would also be available for voluntary rezonings by mobile home parks that were not recommended for mandatory rezoning because they contain less than 50 mobile/manufactured home spaces.

4. Create a loan or grant program available to finance significant investments in new or existing affordable housing infrastructure that would be available to affordable housing and larger mobile home parks both within and contiguous to Fort Collins that are in the Manufactured Home Park Zone and need this assistance to remain financially viable sources of affordable housing over the long term, as identified in subsection VII.B below.14

5. Require a one year notice of closure period for mobile home parks (rather than the 6 month minimum notice required by the state). As an alternative, offer a six (6) month closure notice if the park owner delivers to each resident on or before the notice date a detailed Relocation Report listing all available mobile home park spaces available within 25 miles, providing the contact information for each of those park owners, and including documented estimates of the costs of moving mobile/manufactured homes to those locations. In addition, the notice provision shall also alert residents that the park may be

---

14 Wording revised to broaden applicability to all affordable housing infrastructure, as recommended by Planning and Zoning Board.
closed before the mandatory notice period has expired if all park residents have been successfully relocated to each party’s mutual satisfaction.\textsuperscript{15}

6. Require that mobile home park owners or redevelopers pay (a) actual costs of relocating mobile/manufactured homes to a new site within 25 miles of the redevelopment site, up to a maximum of $6,000 for a single-wide home and $8,000 for a double-wide home, and (b) the actual value (as determined by the County Assessor) of any home that is structurally able to be moved but that cannot be moved due to the unavailability of any spaces within 25 miles, and (c) one-half of the actual value (as determined by the County Assessor) of any mobile/manufactured homes that cannot be moved due to structural weakness or poor condition.\textsuperscript{16}

7. Build the capacity of homeowner groups, non-profit affordable housing providers, and support organizations to purchase affordable housing types, including mobile home parks, offered for redevelopment and manage them as long-term sources of affordable housing.\textsuperscript{17}

\textbf{B. POTENTIAL APPLICATION TO EXISTING MOBILE HOME PARKS}

As noted earlier, different mobile home parks require different levels of protection depending on their size, age, location (within a targeted redevelopment area, or not, and within, contiguous to, or separated from the City), level of current investment in homeowner and park community amenities, and potential future investments required to address known infrastructure issues. The following table indicates how the tools recommended above could be applied to each of the existing mobile home parks. A more detailed explanation of the reasons behind this categorization of the existing mobile home parks is attached as an appendix to this document.

---

\textsuperscript{15} Wording revised to reflect recommendations of the Affordable Housing Board.

\textsuperscript{16} Affordable Housing Board recommended that this provision be strengthened, and Planning and Zoning Board recommended that it be deleted. Recommendation remains unchanged from Public Review Draft, except that relocation cost caps recommended by the AHB have been included, and revisions to how the value of the property is determined.

\textsuperscript{17} Wording revised to reflect Planning and Zoning Board recommendation to broaden impact to include purchase of all types of affordable housing.
<table>
<thead>
<tr>
<th>Mobile Home Park</th>
<th>MHP Zone District</th>
<th>Loan/Grant Support</th>
<th>1 Year Notice of Closure</th>
<th>Payment of Relocation Expenses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Within the City Limits</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hickory Village</td>
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<td>✓</td>
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</tr>
<tr>
<td>400 Hickory Street</td>
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<tr>
<td>Harmony</td>
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</tr>
<tr>
<td>Skyline</td>
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<td>2211 W. Mulberry Street</td>
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<td></td>
</tr>
<tr>
<td>Northstar</td>
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<td>✓</td>
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</tr>
<tr>
<td>1700 Laporte Avenue</td>
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<tr>
<td>1601 N. College Avenue</td>
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</tr>
<tr>
<td>Cottonwood</td>
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<td>Meldrum/Cherry Street MHP</td>
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</tr>
<tr>
<td>329 N. Meldrum Street</td>
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<td></td>
</tr>
<tr>
<td>Pleasant Grove</td>
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<td>517 E. Trilby Road</td>
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<td>Stonecrest MHP</td>
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<td>✓</td>
</tr>
<tr>
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</tr>
<tr>
<td>Montclair Motel</td>
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<td>1405 N. College Avenue</td>
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<tr>
<td>North College (Eastern Portion)</td>
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<tr>
<td>1601 N. College Avenue</td>
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<tr>
<td>In GMA – Contiguous to City Limits</td>
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<td></td>
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</tr>
<tr>
<td>(Tools would apply upon adoption by Larimer County or annexation to City)</td>
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<tr>
<td>Timberridge North</td>
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<td>Poudre Valley</td>
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<td>2025 N. College Avenue</td>
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<td></td>
</tr>
<tr>
<td>Collins Aire</td>
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</tr>
<tr>
<td>401 N. Timberline Road</td>
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</tr>
<tr>
<td>Highland Manor</td>
<td>✓</td>
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<td>✓</td>
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<tr>
<td>(includes 2 non-contiguous parcels)</td>
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<td>301 Spaulding Lane</td>
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<td>242 Spaulding Lane</td>
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<tr>
<td>In GMA-Not Contiguous to City Limits</td>
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<td></td>
</tr>
<tr>
<td>(Tools would apply upon adoption by Larimer County or annexation to City)</td>
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<td></td>
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</tr>
<tr>
<td>Timberridge South MHP</td>
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<tr>
<td>2300 W. County Road 38E</td>
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<td></td>
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<tr>
<td>Blue Spruce MHP</td>
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<td>✓</td>
</tr>
<tr>
<td>2704 N. Shields Street</td>
<td></td>
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</tr>
</tbody>
</table>

Affordable Housing Redevelopment Displacement Mitigation Strategy
<table>
<thead>
<tr>
<th>Mobile Home Park</th>
<th>MHP Zone District</th>
<th>Loan/Grant Support</th>
<th>1 Year Notice of Closure</th>
<th>Payment of Relocation Expenses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whites MHP</td>
<td></td>
<td></td>
<td>✓</td>
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</tr>
<tr>
<td>2131 W. County Road 38E</td>
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<tr>
<td>Equestrian Center MHP</td>
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</tr>
<tr>
<td>2024 N. Whitcomb Street</td>
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<td>✓</td>
</tr>
<tr>
<td>Terry Lake MHP</td>
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<td></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>437 N. Highway 287</td>
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<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Terry Cove</td>
<td></td>
<td></td>
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<td>✓</td>
</tr>
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<td>221 W. Douglas Road</td>
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<td>✓</td>
</tr>
<tr>
<td>Aspen</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>400 S. Overland Trail</td>
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<td>✓</td>
</tr>
<tr>
<td>Parklane</td>
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<td>✓</td>
</tr>
<tr>
<td>411 S. Court Street</td>
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<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Mountainview</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>3109 E. Mulberry Street</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

C. COMPARISON TO RELocation ASSISTANCE AVAILABLE UNDER FURA

The relocation mitigation strategies differ significantly from those available under the Federal Uniform Relocation Act (FURA). Most importantly, four of the tools recommended – the creation of a Manufactured Home Park Zoning District and the offer of financial assistance to upgrade mobile home park infrastructure – are designed to limit or delay redevelopment, while FURA only addresses what happens when dislocation of residents occurs.

Once a decision to redevelop a mobile home park is made, the relocation assistance outlined in subsection VII.A above is not as extensive as that offered under FURA. It does not include a requirement that the mobile home park owner or redeveloper provide relocation advisory services or obligate the park owner or redeveloper to pay any portion of added costs of renting or purchasing adequate replacement housing.
### VIII. IMPLEMENTATION ACTIONS

#### A. SHORT TERM ACTIONS
(IMPLEMENT AT PLAN ADOPTION OR COMPLETION WITHIN 1 YEAR)

<table>
<thead>
<tr>
<th>Action</th>
<th>Responsibility</th>
</tr>
</thead>
</table>
| 1. Review, modify if necessary, and adopt this strategic plan document. | - Social Sustainability Department after conducting a public involvement process which included key stakeholder groups, City advisory boards, and the general public.  
- The City Council has the ultimate adoption authority after conducting a Public Hearing and after receiving recommendations from the Affordable Housing Board, the Planning and Zoning Board, and City staff. |
| 2. Draft and adopt an ordinance requiring payment of relocation expenses by the mobile home park owner or redeveloper, up to a cap, or payments of market value (or partial market value) of manufactures/mobile homes that cannot be moved. | - The City Attorney's Office has the responsibility to prepare the ordinance after receiving assistance from the Social Sustainability Department.  
- The City Council has the ultimate adoption authority after conducting a Public Hearing and after receiving recommendations from the Affordable Housing Board and City staff.  
- If adopted by the Council, the Social Sustainability Department shall work with the Larimer County Planning Department to determine if Larimer County is willing to adopt similar requirements. |
| 3. Draft and adopt a new Manufactured/Mobile Home Park zoning district that would limit redevelopment options but make mobile home parks eligible for grant or loan programs to upgrade failing or substandard infrastructure. Consider including incentives for long-term preservation of the park, for example, waiver of some requirements to pay relocation expenses at the end of that period. | - The City Attorney’s Office has the responsibility to draft the ordinance after receiving assistance from the City’s Land Use Code Team and the Social Sustainability Department.  
- The City Council has the ultimate adoption authority after conducting a Public Hearing and after receiving recommendations from the Affordable Housing Board, the Planning and Zoning Board, and City staff.  
- If adopted by the Council, the Community Development and Neighborhood Services - Advance Planning Department shall work with the Larimer County Planning Department to see if Larimer County is willing to adopt similar zoning requirements. |
B. **LONG TERM ACTIONS**  
(Requiring More Than 1 Year for Completion)

<table>
<thead>
<tr>
<th>Action</th>
<th>Responsibility</th>
</tr>
</thead>
</table>
| 1. Explore potential sources of funding for a grant/loan fund for investments in infrastructure upgrades in existing mobile home parks (including but not limited to CDBG funds, HOME funds, and the Affordable Housing Fund (AHF)). | • Primary responsibility rests with the Social Sustainability Department, which may need to investigate a permanent funding source for the Affordable Housing Fund, as called for in the City’s *Affordable Housing Strategic Plan 2010-2014*.  
  • Mobile home park property owners would need to complete applications for submittal and review through the City’s competitive process for allocating financial assistance to affordable housing projects. |
| 2. Review the preliminary list of mobile home parks eligible for rezoning into the Manufactured Home Park zoning district in section VII.b above for long-term affordable housing potential and consistency with the City’s other plans and redevelopment strategies, and rezone those parks on the resulting list into the Manufactured Home Park district. | • Community Development and Neighborhood Services - Current Planning Department based on the preliminary recommendations contained in this document.  
  • If the Council rezones some mobile home parks inside the City limits, the Community Development and Neighborhood Services – Advance Planning Department shall work with the Larimer County Planning Department to see if Larimer County is willing to rezone certain mobile home parks located outside of the City limits. |
| 3. Identify homeowner groups, non-profit housing owners and operators, and support groups to jointly explore (with the City) opportunities to achieve some affordable housing goals by purchasing and preserving existing mobile home parks, as well as potential sources of purchase financing. | • Mobile home unit owners within a specific park, non-profit affordable housing agencies (e.g., Fort Collins Housing Authority, CARE Housing, etc.), financial assistance agencies (e.g., Funding Partners, CHFA, etc.), City departments (e.g., Neighborhood Services, Social Sustainability, etc.) and/or national support groups (e.g., Resident Owned Communities – USA) would need to collaborate to form a legal entity.  
  • Negotiations would be necessary with willing property-owner sellers of mobile home parks. |
C. REVISIONS TO COLORADO’S MANUFACTURED HOME ACT

Consider supporting Colorado legislation to reduce the burden of mobile home park closures on mobile home owners. Potential areas for amendments to C.R.S. 38-12-200 (the Mobile Home Park Act) and other laws regulating the status of real property could be amended to include some or all of the following:

- Increased notice-of-closure periods (beyond the six months currently required);
- Designating manufactured homes as real property rather than personal property (based on uniform legislation recently released by the Uniform Law Commission);
- Requiring or encouraging the establishment of Homeowners Associations (HOA) in mobile home park communities;
- Creating a fund to support (a) purchases of mobile home parks by mobile home HOAs or third-party owners able to preserve housing affordability, and (b) mobile home relocations when redevelopment occurs;
- Granting mobile home park HOAs a right of first refusal to purchase the park prior to redevelopment, or clarifying that Colorado cities and counties can adopt that requirement on a local option basis.
ATTACHMENTS

The following are attached as reference materials:

1. Former M-M Medium Density Mobile Home Park Zoning District
2. Zoning Recommendations
   a. MHPs Located Inside the City Limits
      i. Candidates for Exclusive MHP Zone District
      ii. Candidates to Maintain Current Zoning
   b. MHPs Located In the GMA and Contiguous to the City Limits
      i. Candidates for Exclusive MHP Zone District After Annexation
   c. MHPs Located In the GMA and Not Contiguous to the City Limits
      i. Candidates for Exclusive MHP Rezoning in the County or After Annexation
      ii. Candidates to Maintain Current Zoning
3. Mobile Home Park Inventory
   a. Parks are listed in 3 groups:
      i. Inside the City Limits
      ii. Contiguous to the City Limits
      iii. Not Contiguous
   b. Inventory data includes:
      i. Park Name
      ii. Number of units
      iii. Size in Acres
      iv. Density (Units/Acre)
      v. Year Built
      vi. Number of Owner Units
      vii. Owner Percentage
      viii. Number of Renter Units
      ix. Renter Percentage
      x. Current Zoning
      xi. Targeted Redevelopment Area
      xii. Former City Zoning District
      xiii. Dirt Streets
      xiv. Wet Utility Issues
      xv. Recreational Amenities
      xvi. Ownership Location
4. Map showing locations of Multi-Family Affordable Housing (North of Drake Road)
5. Map showing locations of Multi-Family Affordable Housing (South of Drake Road)
6. Map showing location of Mobile Home Parks (North of Drake Road)
7. Map showing location of Mobile Home Parks (South of Drake Road)
1. **Former M-M Medium Density Mobile Home Zoning District**

The following zoning district for mobile home parks was included in the City of Fort Collins’ Zoning Ordinance from the mid-1960s to 1997.

*M-M Medium Density Mobile Home District*

**Sec. 29-271. Purpose**

The M-M Medium Density Mobile Home Park District is for areas for mobile homes.

**Sec. 29-272. Uses permitted.**

The uses permitted in the M-M District are as follows:

1. Any use permitted in an R-M Medium Density Residential District, subject to all of the use and density requirements of such district.
2. Mobile homes on individual lots subject to all density requirements specified for a single-family dwelling in an R-M Medium Density Residential District.
3. Mobile home parks containing independent mobile homes not exceeding eight (8) units per net acre with accessory buildings and uses for storage, service and recreation.
4. Mobile home parks containing independent mobile homes not exceeding twelve (12) units per net acre with accessory buildings and uses for storage, service and recreation, provided that the plan for such mobile home park is shown on a Planned Unit Development plan processed, approved and recorded according to the PUD code.

**Sec. 29-273. Bulk and area requirements.**

The bulk and area requirements in the M-M District are as follows:

1. Each mobile home park established in the M-M District shall contain a minimum of five (5) acres.
2. Each mobile home park established in this district shall contain a minimum width of two hundred (200) feet. In addition, there shall be a minimum width of sixty (60) feet which shall front on a public street to provide access to the mobile home park.
3. Minimum yard requirements in this district are as follows:
   a. The minimum distance of any building or mobile home from any exterior lot line of the mobile home park shall be thirty (30) feet. In addition, the minimum distance of any building or mobile home from any public dedicated street shall be twenty (20) feet.
   b. The minimum distance allowed between mobile homes and the buildings in a mobile home park shall be ten (10) feet.
## MHPS LOCATED IN THE FORT COLLINS CITY LIMITS

<table>
<thead>
<tr>
<th>Candidates for Exclusive MHP Zoning District</th>
<th>Justifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harmony MHP</td>
<td>• Largest park (451 units, 69 acres)</td>
</tr>
<tr>
<td></td>
<td>• High percentage owner-occupied (78%)</td>
</tr>
<tr>
<td></td>
<td>• Single- and Double-wide units</td>
</tr>
<tr>
<td></td>
<td>• Owner unit improvements – carports</td>
</tr>
<tr>
<td></td>
<td>• Recreational amenity – swimming pool</td>
</tr>
<tr>
<td></td>
<td>• Former MM Zoning</td>
</tr>
<tr>
<td>Skyline MHP</td>
<td>• Large park (163 units, 26 acres)</td>
</tr>
<tr>
<td></td>
<td>• High percentage owner-occupied (96%)</td>
</tr>
<tr>
<td></td>
<td>• Single- and Double-wide units</td>
</tr>
<tr>
<td></td>
<td>• Owner unit improvements – carports</td>
</tr>
<tr>
<td></td>
<td>• Recreational amenity – swimming pool</td>
</tr>
<tr>
<td></td>
<td>• Former ML Zoning</td>
</tr>
<tr>
<td>Northstar MHP</td>
<td>• Large park (50 units, 4.5 acres)</td>
</tr>
<tr>
<td></td>
<td>• High percentage owner-occupied (88%)</td>
</tr>
<tr>
<td></td>
<td>• Single- and Double-wide units</td>
</tr>
<tr>
<td></td>
<td>• Owner unit improvements – carports</td>
</tr>
<tr>
<td>Hickory Village</td>
<td>Reasons For MHP Zoning:</td>
</tr>
<tr>
<td></td>
<td>• Large park (205 units, 32 acres)</td>
</tr>
<tr>
<td></td>
<td>• High percentage owner-occupied (71%)</td>
</tr>
<tr>
<td></td>
<td>• Owner unit improvements – fences</td>
</tr>
<tr>
<td></td>
<td>• Former MM Zoning</td>
</tr>
<tr>
<td></td>
<td>Reasons Against MHP Zoning:</td>
</tr>
<tr>
<td></td>
<td>• Located in a Targeted Redevelopment Area</td>
</tr>
<tr>
<td></td>
<td>• Sewer problems</td>
</tr>
<tr>
<td>North College MHP (Far West Portion)</td>
<td>Reasons For MHP Zoning:</td>
</tr>
<tr>
<td></td>
<td>• Large park (166 units, 19 acres)</td>
</tr>
<tr>
<td></td>
<td>• High percentage owner-occupied (89%)</td>
</tr>
<tr>
<td></td>
<td>• Owner unit improvements – garages and carports</td>
</tr>
<tr>
<td></td>
<td>• Former MM Zoning</td>
</tr>
<tr>
<td></td>
<td>Reasons Against MHP Zoning:</td>
</tr>
<tr>
<td></td>
<td>• Located in a Targeted Redevelopment Area</td>
</tr>
<tr>
<td>Cottonwood MHP</td>
<td>• High percentage owner-occupied (92%)</td>
</tr>
<tr>
<td></td>
<td>• Previous Zoning = RM</td>
</tr>
<tr>
<td>Meldrum/Cherry Street MHP</td>
<td>• Small park (5 units, Less than ½ acre)</td>
</tr>
<tr>
<td></td>
<td>• All rental units (100%)</td>
</tr>
<tr>
<td></td>
<td>• Dirt streets/parking lot</td>
</tr>
<tr>
<td></td>
<td>• Current NCB Zoning</td>
</tr>
<tr>
<td></td>
<td>• Former C Zoning</td>
</tr>
<tr>
<td>Stonecrest MHP</td>
<td>• Small park (25 units, 2 acres)</td>
</tr>
<tr>
<td></td>
<td>• All rental units (100%)</td>
</tr>
<tr>
<td></td>
<td>• Dirt streets/parking lot</td>
</tr>
<tr>
<td></td>
<td>• Located in a Targeted Redevelopment Area</td>
</tr>
<tr>
<td></td>
<td>• Current CS Zoning</td>
</tr>
<tr>
<td></td>
<td>• Former HB Zoning</td>
</tr>
</tbody>
</table>

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**Affordable Housing Redevelopment Displacement Mitigation Strategy**

[Packet Pg. 111]
### MHPS LOCATED IN THE FORT COLLINS CITY LIMITS

<table>
<thead>
<tr>
<th>Candidates to Maintain Current Zoning District</th>
<th>Justifications</th>
</tr>
</thead>
</table>
| Montclair Motel                               | - Small park (10 units, 1.25 acres)  
- All rental units (100%)  
- Dirt streets/parking lot  
- Located in a Targeted Redevelopment Area  
- Current CS Zoning  
- Former HB Zoning |
| North College (Eastern Portions)              | - Large percentage of rental units (70%)  
- Current CS Zoning  
- Located in a Targeted Redevelopment Area |

### MHPS LOCATED IN THE GMA BOUNDARY CONTIGUOUS TO THE FORT COLLINS CITY LIMITS

<table>
<thead>
<tr>
<th>Candidates for Exclusive MHP Zoning District After Annexation into the City</th>
<th>Justifications</th>
</tr>
</thead>
</table>
| Pleasant Grove MHP                                                            | - Large park (106 units, 13 acres)  
- High percentage owner-occupied (72%)  
- Single- and Double-wide units  
- Owner unit improvements – carports |
| Timberridge North MHP                                                          | - Large park (281 units, 40 acres)  
- High percentage owner-occupied (81%)  
- Single- and Double-wide units  
- Owner unit improvements – carports  
- Recreational amenity – swimming pool |
| Collins Aire MHP                                                               | - Large park (280 units, 52 acres)  
- High percentage owner-occupied (77%)  
- Single- and Double-wide units  
- Owner unit improvements – fences  
- Recreational amenity – swimming pool |
| (Spaulding Lane)                                                               | - High percentage owner-occupied (100%) |
| Poudre Valley MHP                                                              | - Large park (332 units, 39 acres)  
- High percentage owner-occupied (86%)  
- Single- and Double-wide units  
- Owner unit improvements – carports, fences |
| Highland Manor MHP                                                             | - High percentage owner-occupied (100%)  
- Single- and Double-wide units  
- Owner unit improvements – carports |
### MHPS LOCATED IN THE GMA BOUNDARY NOT CONTIGUOUS TO THE FORT COLLINS CITY LIMITS

<table>
<thead>
<tr>
<th>Candidates for Exclusive MHP Zoning District Rezoning in the County or After Annexation into the City</th>
<th>Justifications</th>
</tr>
</thead>
</table>
| Timberridge South MHP                                                                          | • Large park (293 units, 40 acres)  
• High percentage owner-occupied (73%)  
• Single- and Double-wide units  
• Owner unit improvements – carports  
• Recreational amenity – swimming pool |
| Blue Spruce MHP                                                                                 | • High percentage owner-occupied (99%)  
• Owner unit improvements – carports |
| Highland Manor MHP                                                                              | • High percentage owner-occupied (99%)  
• Single- and Double-wide units  
• Owner unit improvements – carports |

### MHPS LOCATED IN THE GMA BOUNDARY NOT CONTIGUOUS TO THE FORT COLLINS CITY LIMITS

<table>
<thead>
<tr>
<th>Maintain Current Zoning</th>
<th>Justifications</th>
</tr>
</thead>
</table>
| Whites MHP              | • Small park (5 units, 1 acre)  
• High percentage renter-occupied (100%)  
• Dirt streets |
| Equestrian Center MHP   | • Small park (3 units, 9 acres)  
• Higher percentage renter-occupied (67%)  
• Dirt streets |
| Terry Lake MHP          | • High percentage renter-occupied (93%)  
• Dirt streets  
• Septic system |
| Terry Cove MHP          | • High percentage renter-occupied (88%)  
• Dirt streets |
| Aspen MHP               | • Higher percentage renter-occupied (56%)  
• Sewer issues |
| Parklane MHP            | • Located in a Targeted Redevelopment Area  
• Sewer issues |
<p>| Mountainview MHP        | • Percentage owner-occupied (50%) and renter-occupied (56%) |</p>
<table>
<thead>
<tr>
<th>Park Name (Inside City Limits)</th>
<th>Assessor's Number of Units</th>
<th>Size in Acres</th>
<th>City Limits (CL) or GMA</th>
<th>Density (Unys/acre)</th>
<th>Contiguous to City Limits</th>
<th>Year Built</th>
<th>Number of Owner Units</th>
<th>Owner Percentage</th>
<th>Number of Renter Units</th>
<th>Renter Percentage</th>
<th>Current Zoning</th>
<th>Targeted Redevelopment Area</th>
<th>Former City Zoning District</th>
<th>Dirt (D) Streets</th>
<th>Wet Utilities Issues</th>
<th>Recreational Amenities</th>
<th>Ownership Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harmony MHP</td>
<td>451</td>
<td>68.78</td>
<td>CL</td>
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<td>1972</td>
<td>352</td>
<td>78%</td>
<td>99</td>
<td>22%</td>
<td>LMN</td>
<td>Yes</td>
<td>MM</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pool</td>
</tr>
<tr>
<td>Skyline MHP</td>
<td>61</td>
<td>9.95</td>
<td>CL</td>
<td>6.1</td>
<td>1976</td>
<td>58</td>
<td>95%</td>
<td>3</td>
<td>5%</td>
<td>LMN</td>
<td>Yes</td>
<td>ML</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pool</td>
</tr>
<tr>
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<td>102</td>
<td>16.49</td>
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<td>1984</td>
<td>98</td>
<td>96%</td>
<td>4</td>
<td>4%</td>
<td>LMN</td>
<td>Yes</td>
<td>ML</td>
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<td></td>
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<td></td>
<td>Pool</td>
</tr>
<tr>
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<td>35</td>
<td>3.27</td>
<td>CL</td>
<td>10.7</td>
<td>1957</td>
<td>32</td>
<td>91%</td>
<td>3</td>
<td>9%</td>
<td>LMN</td>
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<td>NCL</td>
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</tr>
<tr>
<td>Northstar MHP</td>
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<td>CL</td>
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<td>1957</td>
<td>12</td>
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<td>3</td>
<td>20%</td>
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<td>NCL</td>
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<td>Golden, CO</td>
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<tr>
<td>Cottonwood MHP</td>
<td>13</td>
<td>0.77</td>
<td>CL</td>
<td>16.9</td>
<td>1979</td>
<td>12</td>
<td>92%</td>
<td>1</td>
<td>8%</td>
<td>LMN</td>
<td>Yes</td>
<td>RM</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td>Laperie, CO</td>
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<tr>
<td>(Meldrum/Cherry St.)</td>
<td>5</td>
<td>0.38</td>
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<td>1960</td>
<td>0</td>
<td>0%</td>
<td>5</td>
<td>100%</td>
<td>NCB</td>
<td>Yes</td>
<td>C</td>
<td>D</td>
<td></td>
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<td>Fort Collins</td>
</tr>
<tr>
<td>Hickory Village MHP</td>
<td>205</td>
<td>32.11</td>
<td>CL</td>
<td>6.4</td>
<td>1972</td>
<td>146</td>
<td>71%</td>
<td>59</td>
<td>29%</td>
<td>LMN</td>
<td>Yes</td>
<td>MM</td>
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<td></td>
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</tr>
<tr>
<td>North College MHP</td>
<td>96</td>
<td>8.98</td>
<td>CL</td>
<td>10.7</td>
<td>1964</td>
<td>35</td>
<td>36%</td>
<td>61</td>
<td>64%</td>
<td>CS</td>
<td>Yes</td>
<td>MM</td>
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<td></td>
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<td>Fort Collins</td>
</tr>
<tr>
<td>North College MHP</td>
<td>46</td>
<td>4.40</td>
<td>CL</td>
<td>10.5</td>
<td>1968</td>
<td>8</td>
<td>18%</td>
<td>38</td>
<td>72%</td>
<td>CS</td>
<td>Yes</td>
<td>MM</td>
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<td></td>
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</tr>
<tr>
<td>North College MHP</td>
<td>166</td>
<td>19.40</td>
<td>CL</td>
<td>8.6</td>
<td>1972</td>
<td>148</td>
<td>89%</td>
<td>18</td>
<td>11%</td>
<td>LMN</td>
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<td>MM</td>
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<tr>
<td>Pleasant Grove MHP</td>
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<td>12.97</td>
<td>CL</td>
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<td>1970</td>
<td>76</td>
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<td>30</td>
<td>28%</td>
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<td>MM</td>
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<td></td>
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<td>25</td>
<td>100%</td>
<td>CS</td>
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<td>D</td>
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<tr>
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<td>0</td>
<td>0%</td>
<td>10</td>
<td>100%</td>
<td>CS</td>
<td>Yes</td>
<td>HB</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td>Fort Collins</td>
</tr>
</tbody>
</table>

<p>| Total                          | 1336                       | 976           | 73%                      | 360                  | 27%                      |            |                       |               |                      |                  |                |                        |                        |                |                        |                        |                  | Wheat Ridge, CO        |</p>
<table>
<thead>
<tr>
<th>Park Name (Contiguous to City Limits)</th>
<th>Assessor's Number of Units</th>
<th>Size in Acres</th>
<th>City Limits (CL) or GMA</th>
<th>Density (Units/Acre)</th>
<th>Contiguous to City Limits</th>
<th>Year Built</th>
<th>Number of Owner Units</th>
<th>Owner Percentage</th>
<th>Number of Renter Units</th>
<th>Renter Percentage</th>
<th>Current Zoning</th>
<th>Targeted Redevelopment Area</th>
<th>Former City Zoning District</th>
<th>Dirt (D) Streets</th>
<th>Wet Utilities Issues</th>
<th>Recreational Amenities</th>
<th>Ownership Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timberridge North MHP</td>
<td>281</td>
<td>40.43</td>
<td>GMA</td>
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<td>Yes</td>
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<td>53</td>
<td>19%</td>
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<td></td>
<td>Southfield, MI</td>
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<tr>
<td>Collins Aire North MHP</td>
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<td>48</td>
<td>30%</td>
<td>O</td>
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<td>17</td>
<td>14%</td>
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<td>Storm</td>
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<td>39.22</td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>935</td>
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<td></td>
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<td>770</td>
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<td>165</td>
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</tr>
<tr>
<td>Park Name (Not Contiguous)</td>
<td>Assessor's Number of Units</td>
<td>Size in Acres</td>
<td>City Limits (CL) or GMA</td>
<td>Density (Unys/Acre)</td>
<td>Contiguous to City Limits</td>
<td>Year Built</td>
<td>Number of Owner Units</td>
<td>Owner Percentage</td>
<td>Number of Renter Units</td>
<td>Renter Percentage</td>
<td>Current Zoning</td>
<td>Targeted Redevelopment Area</td>
<td>Former City Zoning District</td>
<td>Dirt (D) Streets</td>
<td>Wet Utilities Issues</td>
<td>Recreational Amenities</td>
<td>Ownership Location</td>
</tr>
<tr>
<td>---------------------------</td>
<td>---------------------------</td>
<td>---------------</td>
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<td>-------------------------</td>
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<td>--------------------</td>
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<td></td>
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<td>Pool</td>
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<td>0%</td>
<td>5</td>
<td>100%</td>
<td>R</td>
<td>D</td>
<td></td>
<td></td>
<td>Sewer</td>
<td></td>
<td>Fort Collins</td>
</tr>
<tr>
<td>Aspen MHP</td>
<td>25</td>
<td>1.75</td>
<td>GMA</td>
<td>14.3</td>
<td>No</td>
<td>1970</td>
<td>14</td>
<td>56%</td>
<td>11</td>
<td>44%</td>
<td>M1</td>
<td></td>
<td></td>
<td></td>
<td>Sewer</td>
<td></td>
<td>Greenwood Village, CO</td>
</tr>
<tr>
<td>Parklane MHP</td>
<td>62</td>
<td>7.31</td>
<td>GMA</td>
<td>8.5</td>
<td>No</td>
<td>1958</td>
<td>44</td>
<td>71%</td>
<td>18</td>
<td>29%</td>
<td>C</td>
<td>Yes</td>
<td></td>
<td></td>
<td>Sewer</td>
<td></td>
<td>Boulder, CO</td>
</tr>
<tr>
<td>Mountainview MHP</td>
<td>30</td>
<td>4.34</td>
<td>GMA</td>
<td>6.9</td>
<td>No</td>
<td>1966</td>
<td>15</td>
<td>50%</td>
<td>15</td>
<td>50%</td>
<td>R-2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Watkins, CO</td>
</tr>
<tr>
<td>Equestrian Center MHP</td>
<td>3</td>
<td>9.52</td>
<td>GMA</td>
<td>0.3</td>
<td>No</td>
<td>1962</td>
<td>2</td>
<td>7%</td>
<td>25</td>
<td>93%</td>
<td>O</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td>D</td>
<td>Dublin, CA</td>
</tr>
<tr>
<td>Terry Lake MHP</td>
<td>27</td>
<td>4.30</td>
<td>GMA</td>
<td>6.3</td>
<td>No</td>
<td>1962</td>
<td>2</td>
<td>7%</td>
<td>25</td>
<td>93%</td>
<td>O</td>
<td>D</td>
<td>Septic</td>
<td></td>
<td></td>
<td></td>
<td>Fort Collins</td>
</tr>
<tr>
<td>Blue Spruce MHP</td>
<td>24</td>
<td>5.92</td>
<td>GMA</td>
<td>4.1</td>
<td>No</td>
<td>1966</td>
<td>24</td>
<td>99%</td>
<td>0</td>
<td>1%</td>
<td>FA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>D</td>
<td></td>
</tr>
<tr>
<td>Highland Manor MHP</td>
<td>17</td>
<td>3.34</td>
<td>GMA</td>
<td>5.1</td>
<td>No</td>
<td>1969</td>
<td>17</td>
<td>99%</td>
<td>0</td>
<td>1%</td>
<td>M1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>D</td>
<td></td>
</tr>
<tr>
<td>Terry Cove MHP</td>
<td>24</td>
<td>4.01</td>
<td>GMA</td>
<td>6.0</td>
<td>No</td>
<td>1970</td>
<td>3</td>
<td>12%</td>
<td>21</td>
<td>88%</td>
<td>R</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Fort Collins</td>
</tr>
<tr>
<td></td>
<td>510</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>333</td>
<td>65%</td>
<td>177</td>
<td>35%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Proposed Municipal Code Changes/Updates Related to Mobile Home Park Livability
Per request from Council for research and Staff recommendation
4.17.20

1. Propose as an amendment to City of Fort Collins Municipal Code Sec. 18-6(a) **Designation of Manager** – Every mobile home park shall designate a person to act as manager of the park for the purpose of providing supervision of such mobile home park. Such manager shall be accessible to park residents and the public during reasonable and convenient times. An emergency telephone number, on-site manager’s name, and regular office hours shall be posted in a conspicuous location near the park entrance or on-site manager’s office with instructions for emergency contact in both English and Spanish.

2. Propose as an addition to City of Fort Collins Municipal Code Sec. 18-6 **Limitation on Required Upgrades to Existing Mobile Homes.** No person, including mobile home park owners and property managers, shall require a mobile home resident to make improvements to a mobile home or mobile home lot aside from maintenance, repair, and upkeep related to the mobile home’s exterior to ensure that it complies with the mobile home park’s rules and regulations, so long as such rules and regulations are in compliance with applicable local, state and federal law.

3. Propose as an addition to City of Fort Collins Municipal Code Sec. 18-6 **Neighborhood and Community Meetings.** No mobile home park owner or property manager shall prohibit or interfere with peaceful assemblies of neighborhood groups and/or community meetings in the mobile home park. A mobile home park owner and/or manager shall not take any retaliatory actions against a resident for participation in community meetings.

4. Propose as an addition to City of Fort Collins Municipal Code Sec. 18-6(c) **Trees in mobile home parks are the responsibility of park owners.** No park owner shall require a resident to bear the expense of maintenance of trees in a mobile home park.

5. Propose as amendment to City of Fort Collins Municipal Code Sec. 26-725 **Mobile home park owners billing residents for water, wastewater, and stormwater service**
   (a) **Application.** This section shall apply to customers that are mobile home park owners, as defined in Chapter 18.
   (b) **Water.** A mobile home park owner shall be entitled to bill and collect from the residents of the mobile home park a sum total amount equal to the sum of the water-related rates, fees, and charges imposed pursuant to§ 26-118, § 26-119, § 26-213, § 26-126, and § 26-127. The mobile home park owner shall bill each mobile home lot for the lot’s portion of said fees and charges based on data from a water meter measuring water delivered to the lot, or if no such meter exists or is functioning properly, the bill shall be based on the lot’s proportionate amount of said fees and charges based on the total number of mobile home lots in the mobile home park or some other reasonable basis.
   (c) **Wastewater.** A mobile home park owner shall be entitled to bill and collect from the residents of the mobile home park a sum total amount equal to sum of the wastewater-related rates, fees, and charges imposed pursuant to § 26-277, § 26-280, and § 26-281. The mobile home park owner shall bill each mobile home lot for the lot’s portion of said fees and charges based on data from a water meter measuring water delivered to the lot, or if no such meter exists or is functioning properly, the bill shall be based a proportionate amount of said fees based on the
total number of mobile home lots in the mobile home park, or some other reasonable basis.

(d) Stormwater. A mobile home park owner shall be entitled to bill and collect from the residents of the mobile home park a sum total amount equal to the sum of the stormwater utility fee imposed pursuant to § 25-513 and § 26-514. The mobile home park owner shall bill each mobile home lot a proportionate amount of said fees based on the total number of mobile home lots in the mobile home park, or some other reasonable basis.

(e) Form of Bills. A mobile home park owner shall only bill and collect for water, wastewater, and stormwater services from the residents of the mobile home park using bills that are in writing that (1) show the fees and charges for water, wastewater, and stormwater services as three separate line items on the bill, and (2) describe in detail how the fees and charges billed to the resident for water, wastewater, and stormwater services were calculated pursuant to Subsections (b), (c), and (d).
Zone District Update
- Existing zoning & conditions
- New zone district standards
- Rezoning criteria

Livability / Residents’ Rights Strategies
- Implementation update
- Licensing
Direction Sought

New Manufactured Housing Zone District

1) Does Council prefer a zone district designed exclusively for manufactured housing preservation (Option A), or a broader zone district that also permits affordable housing options (Option B)?

2) Does Council have guidance on staff’s proposed criteria for the evaluation of sites to rezone?

Livability / Residents’ Rights Strategies

3) TBD – Add from neighborhood services
Manufactured Housing Zone District

- Local tool to preserve existing manufactured housing
- Reduces redevelopment options
- Tradeoffs & tensions:
  - Strict vs. flexible standards & effectiveness of preservation
  - May perpetuate substandard infrastructure
  - Impact on long-term neighborhood vision
  - Private property rights
Manufactured Housing Community (MHC) Locations in the Fort Collins GMA

<table>
<thead>
<tr>
<th></th>
<th>City</th>
<th>GMA</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communities</td>
<td>10</td>
<td>14</td>
<td>24</td>
</tr>
<tr>
<td>Home Sites</td>
<td>1,400</td>
<td>2,137</td>
<td>3,537</td>
</tr>
</tbody>
</table>
Existing Zoning (city limits)

**Residential Zoning**
- 6 located in Low Density Mixed-Use Neighborhood (LMN) District
- 1 located in Neighborhood Conservation Buffer (NCB) District

**Commercial Zoning**
- 2 located in Service Commercial (CS) District

**Mixed Zoning**
- 1 located in two zone districts (CS & LMN)
### Existing CS & LMN Zoning:

- No manufactured housing specific standards
- Rely on ‘General Development Standards’ in Land Use Code
- Wide variety of permitted uses and intensities

<table>
<thead>
<tr>
<th>CS</th>
<th>LMN</th>
</tr>
</thead>
<tbody>
<tr>
<td>95 permitted uses; mostly commercial</td>
<td>43 permitted uses; mostly residential</td>
</tr>
<tr>
<td>No density maximum</td>
<td>Maximum density of 9 dwelling units/acre (12 if affordable)</td>
</tr>
<tr>
<td>3-story height limit</td>
<td>3-story height limit</td>
</tr>
</tbody>
</table>
Proposed Definitions:

*Manufactured home* shall mean a preconstructed, transportable dwelling unit built on a permanent chassis and installed on a foundation system. The term manufactured home shall also include mobile homes, which are similar transportable dwelling units constructed prior to federal manufactured home standards adopted in 1976.

*Manufactured housing community* shall mean a parcel of land which has been planned, improved, or is currently used for the placement of five or more manufactured homes. Manufactured housing communities may also contain accessory uses intended primarily for the use and benefit of their residents, including but not limited to clubhouses, playgrounds and recreational amenities, childcare, meeting and assembly spaces, retail, and personal and business services.
Purpose of new definitions:

- Update terminology and align with state/federal definitions
  - Manufactured housing preferred name vs. mobile home
- Define a minimum size (5 or more manufactured homes)
- Permit *accessory* uses within manufactured housing community
  - Childcare
  - Vending
  - Gatherings / trainings / classes
## New Zone District - Standards

<table>
<thead>
<tr>
<th>Standard</th>
<th>Measurement</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Setbacks</td>
<td>(Front): 15-ft (Side): 10-ft (Rear): 10-ft</td>
<td>ß Common distance for existing development; similar to other residential zoning</td>
</tr>
<tr>
<td>Unit Separation</td>
<td>10-ft (all directions)</td>
<td>ß Fire separation requirements</td>
</tr>
<tr>
<td>Density</td>
<td>Maximum 12 units/acre</td>
<td>ß Modeled after LMN affordable housing standard</td>
</tr>
<tr>
<td>Height</td>
<td>Maximum 3-stories</td>
<td>ß Existing zoning &amp; site context</td>
</tr>
<tr>
<td>Building Size</td>
<td>Maximum 5,000 sf footprint</td>
<td>ß Compatibility for nonresidential development</td>
</tr>
<tr>
<td>Other/misc.</td>
<td>Use Article 3 ‘General Development Standards’</td>
<td></td>
</tr>
</tbody>
</table>
New Zone District – Permitted Uses

Permitted Uses:
- High impact in the preservation of existing manufactured housing
- Determines (re)development potential

Framework Options for Permitted Uses:
- Manufactured Housing Preservation (more strict)
- Affordable Housing Options/Preservation (flexibility for affordable housing)
# New Zone District – Permitted Uses

## A Manufactured Housing Preservation

<table>
<thead>
<tr>
<th>Residential Uses</th>
<th>Commercial / Institutional Uses</th>
<th>Miscellaneous Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufactured housing community</td>
<td>Childcare centers</td>
<td>Urban agriculture</td>
</tr>
<tr>
<td>Shelters for victims of domestic violence</td>
<td>Adult day/respite care centers</td>
<td>Neighborhood parks</td>
</tr>
<tr>
<td>Group homes</td>
<td>Places of worship or assembly</td>
<td>Parks, recreation and other open lands</td>
</tr>
<tr>
<td>Extra occupancy rental houses</td>
<td>Minor public facilities</td>
<td></td>
</tr>
<tr>
<td>Short term primary rentals</td>
<td>Wireless telecommunications equipment</td>
<td></td>
</tr>
</tbody>
</table>
### Affordable Housing Options

<table>
<thead>
<tr>
<th>Residential Uses</th>
<th>Commercial / Institutional Uses</th>
<th>Miscellaneous Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufactured housing communities</td>
<td>Child care centers</td>
<td>Urban agriculture</td>
</tr>
<tr>
<td>Shelters for victims of domestic violence</td>
<td>Adult day/respite care centers</td>
<td>Neighborhood parks</td>
</tr>
<tr>
<td>Group homes</td>
<td>Places of worship or assembly</td>
<td>Parks, recreation and other open lands</td>
</tr>
<tr>
<td>Extra occupancy rental houses</td>
<td>Minor public facilities</td>
<td></td>
</tr>
<tr>
<td>Short term primary rentals</td>
<td>Wireless telecommunications equipment</td>
<td></td>
</tr>
<tr>
<td><strong>Single family detached dwellings</strong> *</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Single-family attached dwellings</strong> *</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Two-family dwellings</strong> *</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Multifamily dwellings</strong> *</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Bold** = additional land uses compared to Option A

* Requirement for designated affordable units when (re)development results in the loss of manufactured housing
Considerations & Tradeoffs

**Option A**
- Specific preservation of manufactured housing
- Larger impact on private property rights
- Very limited change or redevelopment potential

**Option B**
- More potential for site changes, if affordable housing is included
- Conversion to affordable housing may still lead to displacement; loss of unique type of housing
- Redevelopment potential could help improve infrastructure
## Rezoning Evaluation Criteria

<table>
<thead>
<tr>
<th>CRITERIA</th>
<th>NOTES:</th>
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<tbody>
<tr>
<td><strong>Size</strong> (acres/# units)</td>
<td>Larger = rezoning candidate</td>
</tr>
<tr>
<td><strong>Presence of Natural Hazards</strong></td>
<td>Present = not a candidate</td>
</tr>
<tr>
<td><strong>% Owner Occupied Units</strong></td>
<td>Higher = rezoning candidate</td>
</tr>
<tr>
<td><strong>Comp. / Policy Plan Guidance</strong></td>
<td>Aligns = rezoning candidate</td>
</tr>
<tr>
<td><strong>Zoning History</strong></td>
<td>Prior MH zone = rezoning candidate</td>
</tr>
<tr>
<td><strong>Infrastructure Conditions</strong></td>
<td>Poor = not a candidate</td>
</tr>
<tr>
<td><strong>Stakeholder Input</strong></td>
<td></td>
</tr>
</tbody>
</table>
Targeted Outreach Continues:
- Boards & Commissions, Residents, Owners/Managers
  - Outreach with some owners has been difficult
  - Reorienting outreach approach due to COVID-19

Updated Timeline & Process
- Separate the Land Use Code (LUC) and rezoning processes
  - Bring LUC amendments forward first this spring
  - Bring forward rezonings based on COVID-19 precautions
    (quasi-judicial hearings)
## Recent Improvements 2019

<table>
<thead>
<tr>
<th>Improvement / Project</th>
<th>Progress</th>
<th>Project Completion Timeline</th>
</tr>
</thead>
</table>
| Mobile Home Park ("MHP") Neighborhood Handbook | • Public Outreach to MHP residents, owners, managers, and community partners for content  
• Research of related handbooks completed | • July 2020 |
| MHP Mini-Grant Program | • Implementation process completed  
• Application draft completed  
• Outreach events ongoing & scheduled with 7 MHP’s | • Completed  
• Round 2 disbursement August 2020 |
| Neighborhood Liaisons | • Community partners identified as existing liaisons for 3 MHP’s  
• Created landing webpage & Microsoft Team for MHP issues and resources | • December 2021 for all MHP’s in city limits and GMA  
• On hold |
# Summary of Residents' Rights Strategies

<table>
<thead>
<tr>
<th>Completed</th>
<th>In Progress/Underway</th>
<th>Mid Term (7-12 months)</th>
<th>Long Term / Resources Req.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Website</td>
<td>Liaisons (highest need parks)</td>
<td>Accessory structures privileges</td>
<td>Negotiated investments</td>
</tr>
<tr>
<td>Mini-Grants Round 1</td>
<td>Handbook</td>
<td>Privacy Rights</td>
<td>Single Metering (water)</td>
</tr>
<tr>
<td>Maintenance Responsibilities</td>
<td>LHIP &amp; Emergency Grants</td>
<td></td>
<td>Liaisons (all parks)</td>
</tr>
<tr>
<td>Utility Billing Transparency</td>
<td>Partner/Contractor Projects CARE; LCCC</td>
<td></td>
<td>Sale notice &amp; purchase opportunity</td>
</tr>
<tr>
<td>Trees Maintenance</td>
<td>Local Complaint System</td>
<td></td>
<td>Enforcement of Existing Municipal Code (Section 18)</td>
</tr>
<tr>
<td>Limitation of required upgrades</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Mobile Home Community Licensing Program:
- Proactive approach to identifying livability issues
- Removes pressure on residents to report livability issues
- Provides transparent standards for MHC owners and managers
- Existing programs in other states could be a model for MHC licensing in Fort Collins
- Some program cost recovery from license fees
Mobile Home Community Licensing Program:

- Development of the licensing requirements and piloting would require additional resources.
- Licensing fees or inspection fees could potentially be passed to residents through MHC lot rent or community fees.
- Setting reasonable licensing or inspection fees requires additional market research.
- Educational outreach would be necessary for MHC owners, managers and residents prior to implementation.
Direction Sought

New Manufactured Housing Zone District

1) Does Council prefer a zone district designed exclusively for manufactured housing preservation (Option A), or a broader zone district that also permits affordable housing options (Option B)?

2) Does Council have guidance on staff’s proposed criteria for the evaluation of sites to rezone?

Livability / Residents’ Rights Strategies

3) TBD – Add from neighborhood services