

Zone Map Amendment (Rezoning) - Legislative Rezoning Proposal

| PROPERTY OWNER INFORMATION | | REPRESENTATIVE* | |
|---|---|---|----------------------------------|
| Property Owner Name | Multiple - list attached | Representative Name | Council Districts 2, 3, 7, and 9 |
| Address | | Address | 1437 Bannock Street, Room 451 |
| City, State, Zip | | City, State, Zip | Denver, CO 80202 |
| Telephone | | Telephone | (720) 337-2000 |
| Email | | Email | dencc@denvergov.org |
| SUBJECT PROPERTY INFORMATION | | | |
| Location (address and/or boundary description): | 960-990 S. Jason Street, 4501 W. Kentucky Avenue, 5220 N. Steele Street & 5201 N. Adams Street, 2825 W. Evans Avenue & 2040 S. Federal Boulevard, and 4765 N. York Street | | |
| Assessor's Parcel Numbers: | Multiple - attached | | |
| Area in Acres or Square Feet: | 17.76 acres | | |
| Current Zone Districts: | I-A UO-2, E-TU-C & E-TU-C UO-1, UO-2, I-A UO-2, S-MX-3 & S-MX-3 UO-1, UO-2, and E-TU-B | | |
| PROPOSAL | | | |
| Proposed Zone Districts: | Manufactured Home Community (MHC) | | |
| REVIEW CRITERIA | | | |
| General Review Criteria: The proposal must comply with all of the general review criteria DZC Sec. 12.4.10.13 | <input checked="" type="checkbox"/> | Consistency with Adopted Plans: The proposed official map amendment is consistent with the City's adopted plans, <i>Please provide an attachment describing relevant adopted plans and how proposed map amendment is consistent with those plan recommendations; or, describe how the map amendment is necessary to provide for an unanticipated community need.</i> | |
| | <input checked="" type="checkbox"/> | Uniformity of District Regulations and Restrictions: The proposed official map amendment results in regulations and restrictions that are uniform for each kind of building throughout each district having the same classification and bearing the same symbol or designation on the official map, but the regulations in one district may differ from those in other districts. | |
| | <input checked="" type="checkbox"/> | Public Health, Safety and General Welfare: The proposed official map amendment furthers the public health, safety, and general welfare of the City. | |

Proposed Rezoning

The proposed rezoning is for Denver’s five existing mobile home parks: Aspen Terrace, Capital City/Montevista, Longview Mobile Home Park, Shady Acres, and York Mobile Home Park. The mobile home parks were established decades ago and are all considered nonconforming uses within their current Denver Zoning Code (DZC) zone districts. These communities are an example of naturally occurring affordable housing and their current zone districts could enable redevelopment to other land uses and involuntary displacement.

This map amendment proposal is accompanied by a [proposed text amendment](#) to create a new Manufactured Home Community (MHC) Zone District to apply to these existing communities. The map amendment request is to rezone these properties from their current zone districts to MHC, as shown below.

| Community Name | Location | Current Zone District | Proposed Zone District |
|---------------------------|--|------------------------------|-------------------------------|
| Aspen Terrace | 960-990 S. Jason Street | I-A UO-2 | MHC |
| Capital City/Montevista | 4501 W. Kentucky Avenue | E-TU-C & E-TU-C UO-1, UO-2 | MHC |
| Longview Mobile Home Park | 520 N. Steele Street & 5201 N. Adams Street | I-A UO-2 | MHC |
| Shady Acres | 2825 W. Evans Avenue & 2040 S. Federal Boulevard | S-MX-3 & S-MX-3 UO-1, UO-2 | MHC |
| York Mobile Home Park | 4765 N. York Street | E-TU-B | MHC |

Review Criteria

Pursuant to Section 12.4.10.7 of the Denver Zoning Code, the review criteria for this legislative rezoning request are as follows:

A. Consistency with Adopted Plans

The proposed official map amendment is consistent with the City’s adopted plans, or the proposed rezoning is necessary to provide land for a community need that was not anticipated at the time of the adoption of the City’s plan.

The proposed official map amendment is consistent with the City’s adopted plans, as detailed below. The following adopted plans apply to this application:

- Denver Comprehensive Plan 2040
- Blueprint Denver
- Athmar Park Neighborhood Perimeter Plan
- Elyria & Swansea Neighborhoods Plan
- Westwood Neighborhood Plan

1. Denver Comprehensive Plan 2040

The proposed rezoning is consistent with several of the adopted Denver Comprehensive Plan 2040 strategies, including:

Vision Element: Equitable, Affordable and Inclusive

Goal 3, Strategy B: *Use land use regulations to enable and encourage the private development of affordable, missing middle and mixed-income housing, especially where close to transit* (pg. 28).

Goal 4: *Preserve existing affordable housing* (pg. 29).

Goal 5, Strategy B: *Stabilize residents and businesses at risk of displacement through programs and policies that help them to stay in their existing community* (pg. 29).

Goal 8: *Increase housing options for Denver's most vulnerable populations* (pg. 30).

The proposed map amendment to the Manufactured Home Community (MHC) zone district achieves the goals above by amending the zoning regulations associated with these vulnerable communities. The MHC zone district encourages dwelling unit replacement and discourages redevelopment of these communities for other land uses. The communities will no longer be nonconforming uses and will have a clear path to permitting for replacement units, accessory structures, and home occupations. Making them a conforming use also facilitates the opportunity for residents to purchase their community if the current landowner decides to put it up for sale.

2. Blueprint Denver

Blueprint Denver was adopted in 2019 as a supplement to Comprehensive Plan 2040 and establishes an integrated framework for the city's land use and transportation decisions. The proposed rezoning is consistent with several of the plan policies and strategies, as well as the equity concepts.

Blueprint Denver Plan Policies and Strategies

Blueprint Denver contains numerous recommendations related to pedestrian-oriented design, promotion of housing, and arrangement of uses in mixed-use areas. The proposed rezoning is consistent with the following policies and strategies:

Land Use and Build Form: General Policy 5, Strategy B

Where the potential for involuntary displacement is identified, evaluate and implement methods to mitigate displacement... (pg. 74)

Land Use and Build Form: General Policy 11

Implement plan recommendations through city-led legislative rezonings and text amendments. (pg. 79)

Land Use and Build Form: Housing Policy 1, Strategy A

Update the zoning code to modernize permitted use categories related to group living and expand the allowance of flexible and affordable housing types. (pg. 82)

F. Blueprint Denver Equity Concepts

Blueprint Denver has three equity concepts: improving access to opportunity, reducing vulnerability to displacement, and expanding housing and jobs diversity. Blueprint Denver states that *text amendments and large legislative rezonings should be guided by the equity concepts* (pg. 79). Staff uses GIS with parcel-level, Census-tract, and neighborhood-wide data to measure these equity concepts. The information highlights what key issues or needs are present and points to potential options for improvements or mitigation.

Access to Opportunity

An area's access to opportunity is measured by averaging scores from several categories: Social Determinants of Health (percent of population who are high school graduates and percent of families below the poverty line), Built Environment (access to fresh food and open space), Access to Healthcare, Child Obesity, Life Expectancy, Access to Transit, and Access to Centers and Corridors. The scores range from 1 to 5, with 1 being the least access to opportunity. The average scores for the subject properties are: Aspen Terrace 3.4, Capital City/Montevista 3.1, Longview 2.4, Shady Acres 3.2, and York 2.9. The rezoning ensures that the residents of existing manufactured home communities continue to have access to existing opportunities, which vary for each community, but include access to fresh food, open space, transit, and centers and corridors.

Vulnerability to Displacement

An area's vulnerability to displacement is measured by totaling the scores of Educational Attainment, Rental Occupancy, and Median Household Income. The scores are either 0 (not vulnerable) or 1 (vulnerable), so a 3 is the highest score and most vulnerable to displacement. This was the main equity. The scores for the subject properties are: Aspen Terrace 2, Capital City/Montevista 3, Longview 3, Shady Acres 3, and York 3. This is the main equity concept that the proposed rezoning is trying to address because the proposed MHC zone district limits the primary land use to only a manufactured home community. This will make redeveloping a community for different land uses less likely and subject to further review and analysis (starting with rezoning to a different zone district).

Housing Diversity

An area's housing diversity is measured by totaling the scores of Missing Middle Housing, Diversity of Bedroom Count Per Unit, Ratio of Owners to Renters, Housing Costs, and Income Restricted Units. The scores are either 0 (not diverse) or 1 (diverse) for each of the metrics, so a 5 is the highest total score and has the most housing diversity. The scores for the subject properties are: Aspen Terrace 1, Capital City/Montevista 3, Longview 2, Shady Acres 4, and York 3.

Jobs Diversity

An area's jobs diversity is measured by two key factors related to the availability and variety of employment options: (1) Jobs density: the number of jobs in different parts of the city (jobs per acre) and (2) Jobs diversity: The mix of jobs in different parts of the city. There are some interesting takeaways from this data for the subject properties. There are less than 100 jobs in the census block group for Capital City/Montevista which means that the job mix data is not reliable. The other areas all see more of an emphasis on manufacturing jobs. The subject rezoning helps to increase the job diversity for the subject properties by allowing several home occupations within the MHC zone district.

3. Department of Housing Stability (HOST) Five-Year Strategic Plan

Housing Opportunity Goal 2: Preserve Existing Affordable Homes:

By 2026, HOST and its partners will: Preserve at least 950 apartments and for-sale homes (pg. 33).

The proposed rezoning preserves existing affordable homes by reducing the risk of redevelopment for other land uses and making the replacement of manufactured homes exempt from costly site improvements and design standards.

4. Small Area Plans

Four of the five subject properties are within the boundaries of an adopted small area plan, with Shady Acres being the only community without a small area plan. Current Neighborhood Planning Initiative (NPI) efforts for the Southwest and Far Southwest areas are underway and will include Shady Acres, and the other two communities in southwest Denver – Aspen Terrace and Capital City/Montevista. None of the existing small area plans, listed below, acknowledge mobile home parks specifically but each contains goals and policies that support the proposed rezoning.

Athmar Park Neighborhood Perimeter Plan

The Aspen Terrace community is within the boundaries of this plan. An overall plan goal and recommendation is to: *Promote neighborhood stability, support preservation of the neighborhood character, and create a sense of place (pg. 14).* The proposed rezoning seeks to provide stability for the manufactured home communities and supports the preservation of the neighborhood character.

Elyria & Swansea Neighborhoods Plan

The Longview Mobile Home Park and York Mobile Home Park are within the boundaries of this plan. Policy B.3 Increase Housing Choices: *Encourage investment in new housing to expand the total number of residences and to provide for a diversity of housing types to bring more people of all ages and income levels into the neighborhood (pg. 29).* The proposed rezoning adds to the diversity of housing types available for all ages and income levels and helps provide regulatory stability to encourage more investment in these communities.

Westwood Neighborhood Plan

The Capital City/Montevista community is within the boundaries of this plan. Recommendation B.3.A. Encourage Diversity states, *Investments in housing should strive to include a diverse range of housing types creating a seamless integration of low income, workforce and market rate housing options throughout the neighborhood. Ensure a full range of housing choices, including sizes and prices, accommodating various family structures (pg. 44).* The proposed rezoning will solidify manufactured homes as a housing option for the Capital City/Montevista community.

B. Uniformity of District Regulations and Restrictions

The proposed official map amendment results in regulations and restrictions that are uniform for each kind of building throughout each district having the same classification and bearing the same symbol or designation on the official map, but the regulations in one district may differ from those in other districts.

The proposed rezonings to MHC will result in the uniform application of zone district building form, use, and design regulations. The MHC zone district was created specifically for the subject properties.

C. Public Health, Safety and General Welfare

The proposed official map amendment furthers the public health, safety and general welfare of the City.

The proposed rezoning furthers the public health, safety and general welfare of the City because it stabilizes five vulnerable communities within the city that have existed in the same location for decades; maintains an important source of affordable housing; encourages the replacement of older homes with newer homes; and enables the purchase of these communities by their residents.

York Mobile Home Park
4765 N. York St.

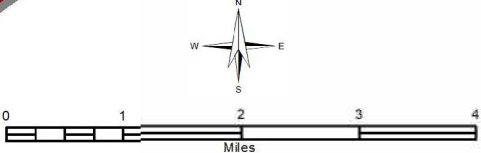
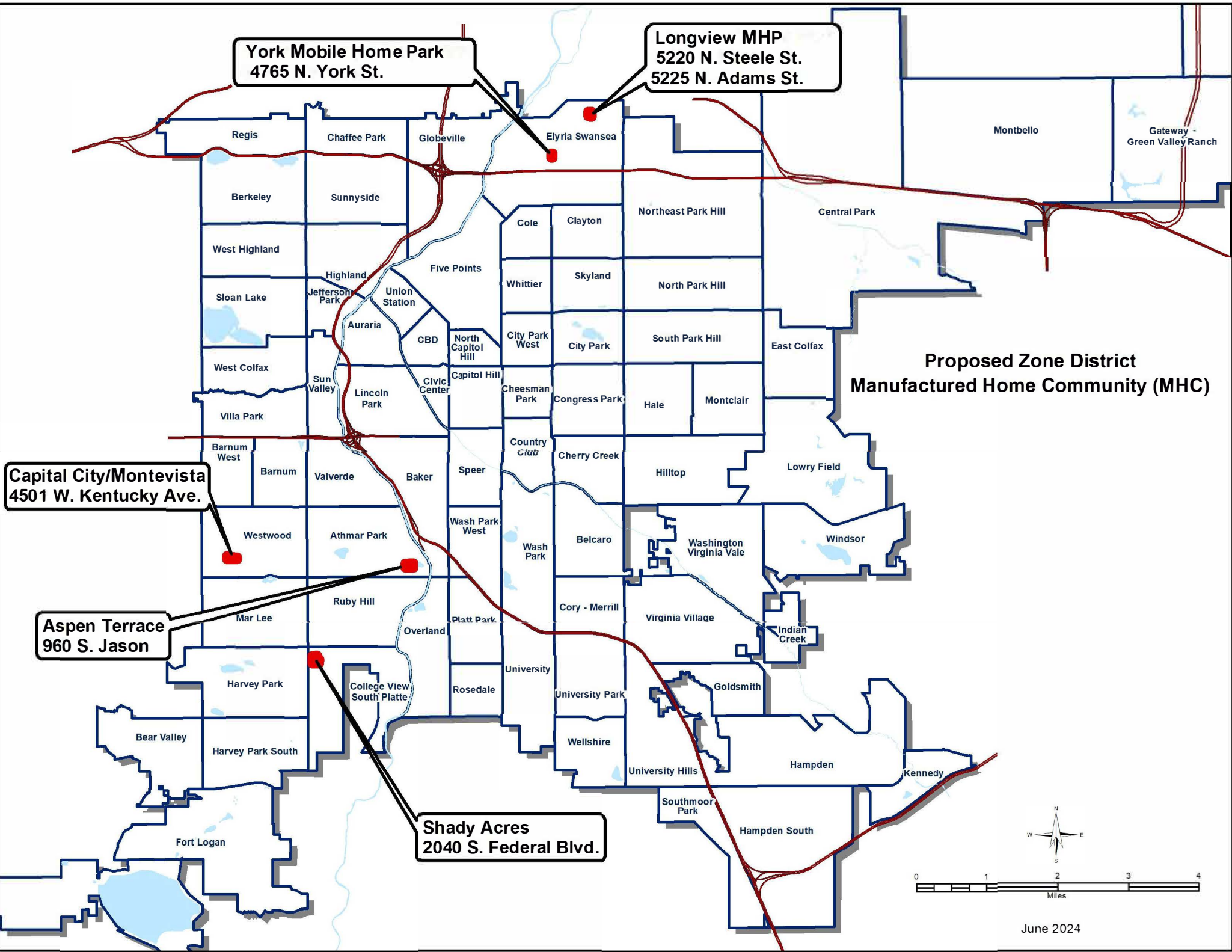
Longview MHP
5220 N. Steele St.
5225 N. Adams St.

Capital City/Montevista
4501 W. Kentucky Ave.

Aspen Terrace
960 S. Jason

Shady Acres
2040 S. Federal Blvd.

**Proposed Zone District
Manufactured Home Community (MHC)**



Property Owners

| | SCHEDNUM | OWNER_NAME | OWNER_ADDRESS | CITY | STATE | ZIP |
|---------------------------|-----------------|----------------------------------|-----------------------|---------------|--------------|------------|
| Aspen Terrace | 0516400318998 | ASPEN TERRACE MOBILE PARK LLC | PO BOX 1837 | ARVADA | CO | 80001-1837 |
| | 0516400157000 | ASPEN TERRACE MOBILE PARK LLC | | | | |
| | 0516400158000 | ASPEN TERRACE MOBILE PARK LLC | | | | |
| Capitol City | 0518300303000 | DESERT PROPERTIES LP | 372 S EAGLE RD | EAGLE | ID | 83616-5908 |
| Longview Mobile Home Park | 0213107021000 | PCP-LONGVIEW LLC | 548 MARKET ST # 50631 | SAN FRANCISCO | CA | 94104-5401 |
| | 0213107020000 | PCP-LONGVIEW LLC | | | | |
| Shady Acres | 0529100005000 | SHADY ACRES MOBILE HOME PARK LLC | PO BOX 370366 | DENVER | CO | 80237-0366 |
| York Mobile Home Park | 0223101020000 | BRUCE RANDOLPH PROPERTIES LLC | 8100 E FAIRMOUNT DR | DENVER | CO | 80230-6700 |