



TO: Land Use, Transportation and Infrastructure Committee
FROM: Justin Montgomery, AICP, Senior City Planner
DATE: October 10, 2024
RE: 1. Denver Zoning Code (as amended through July 5, 2023) Text Amendment to create the Manufactured Home Community zone district.
2. Official Zoning Map Amendment Proposal #2024i-00089

Staff Report and Recommendation

1. Text Amendment

Based on the review criteria for text amendments set forth in the Denver Zoning Code (DZC), Section 12.4.11 (Text Amendment), CPD staff recommends that the Land Use, Transportation, and Infrastructure (LUTI) Committee move the Manufactured Home Communities Text Amendment to forward for consideration by the full City Council.

2. Map Amendment

Based on the review criteria for an official map amendment stated in the DZC, Section 12.4.10 (Map Amendment), CPD staff recommends that the LUTI Committee move map amendment #2024i-00089 forward for consideration by the full City Council.

Request for Rezoning

Addresses: 960-990 S. Jason Avenue (Aspen Terrace), 5220 N Steele Street & 5201 N. Adams Street (Longview Mobile Home Park), 4501 W Kentucky Avenue (Montevista), 2825 W Evans Avenue (Shady Acres), 4765 N York Street (York Mobile Home Park)

Neighborhoods/Council Districts: Athmar Park/District 7, College View-South Platte/District 2, Elyria Swansea/District 9, and Westwood/District 3

RNOs: Inter Neighborhood Cooperation (INC), Strong Denver, Athmar Park Neighborhood Association, Hecho en Westwood, Westwood Community Action Team, Westwood Unidos, College View Neighborhood Association, Ruby Hill Neighbors, United Community Action Network, Elyria Swansea Neighborhood Association, Denver North Business Association, Opportunity Corridor Coalition of United Residents, & East Denver Unity Neighbors

Area of Property: 17.76 acres (total)
Current Zoning: 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

Proposed Zoning: Manufactured Home Community (MHC), created by the subject text amendment

Property Owner(s): Multiple, see legislative proposal attachment
Proposal Sponsors: City Councilmembers Jamie Torres, Flor Alvidrez, Kevin Flynn, and Darrell Watson

Background

Denver is home to five mobile home parks with approximately 304 housing units. This housing is not income-restricted, but it is an important source of affordable housing. The five communities were developed decades ago, before modern zoning regulations. For many years, the Denver Zoning Code has considered them a nonconforming use that is not allowed in any zone district. Older mobile homes that had become unsafe and unlivable couldn't be replaced with newer units, until March 2023, when City Council adopted an amendment to the zoning code to allow such replacements. Even with this change, the nonconforming use designation for mobile home parks poses regulatory barriers and could result in their redevelopment.

Community Name	Location	Current Zone District	Proposed Zone District
Aspen Terrace	960-990 S. Jason Street	I-A UO-2	MHC
Longview Trailer Park	520 N. Steele Street & 5201 N. Adams Street	I-A UO-2	MHC
Montevista	4501 W. Kentucky Avenue	E-TU-C & E-TU-C UO-1, 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

A council led moratorium on CPD approving a Site Development Plan changing the use of any of the five mobile home parks expires 12/31/24.

Summary and Purpose

1. Text Amendment

The Manufactured Home Communities project, sponsored by City Councilmembers Jamie Torres (District 3), Flor Alvidrez (District 7), Kevin Flynn (District 2), and Darrell Watson (District 9), proposes updates to the Denver Zoning Code (DZC) to encourage the continued use and improvement of Denver's existing mobile home parks. The proposed text amendment introduces a new zone district, Manufactured Home Community (MHC), which is the proposed zoning for the subject map amendment. The intention of the text amendment is to alleviate redevelopment pressure and explicitly allow a manufactured home community use in the zoning code.

A Planning Board review draft of the proposed text amendment is available on the [project's webpage](#) and is included as an attachment to this staff report.

2. Map Amendment

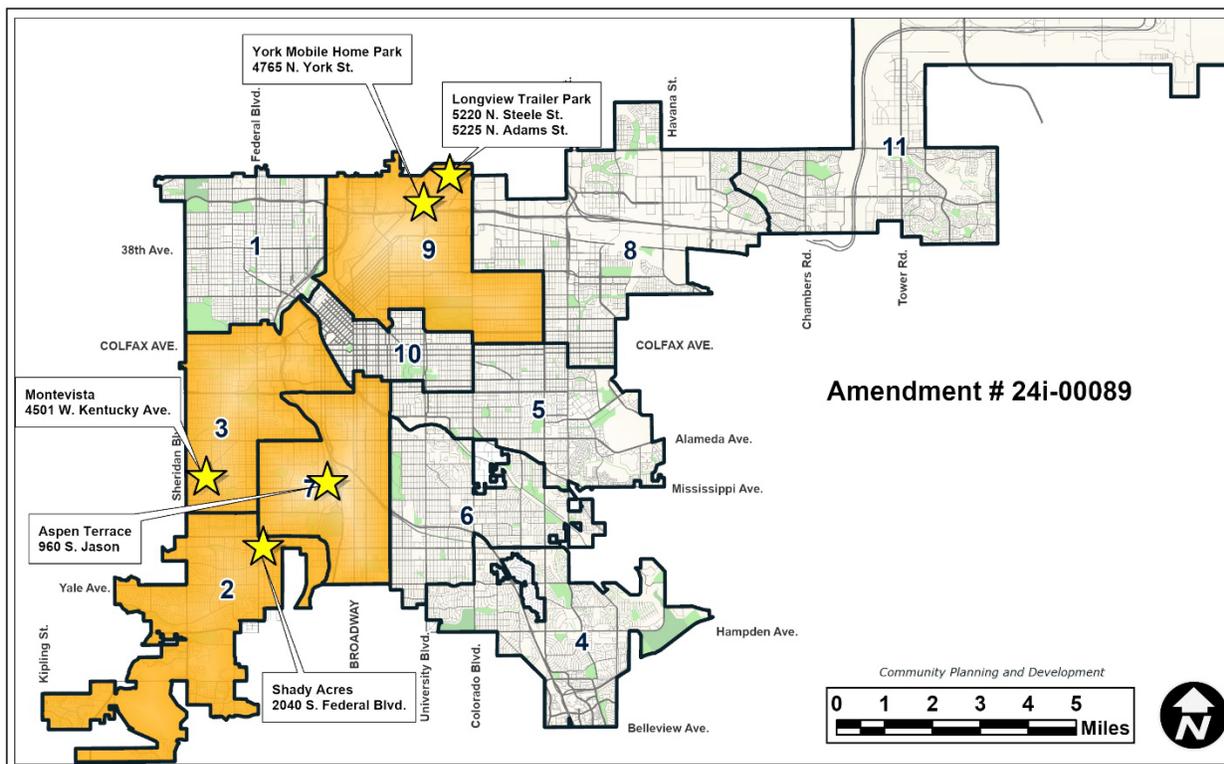
City Councilmembers Jamie Torres (District 3), Flor Alvidrez (District 7), Kevin Flynn (District 2), and Darrell Watson (District 9) are also sponsoring a map amendment to apply the MHC zone district to

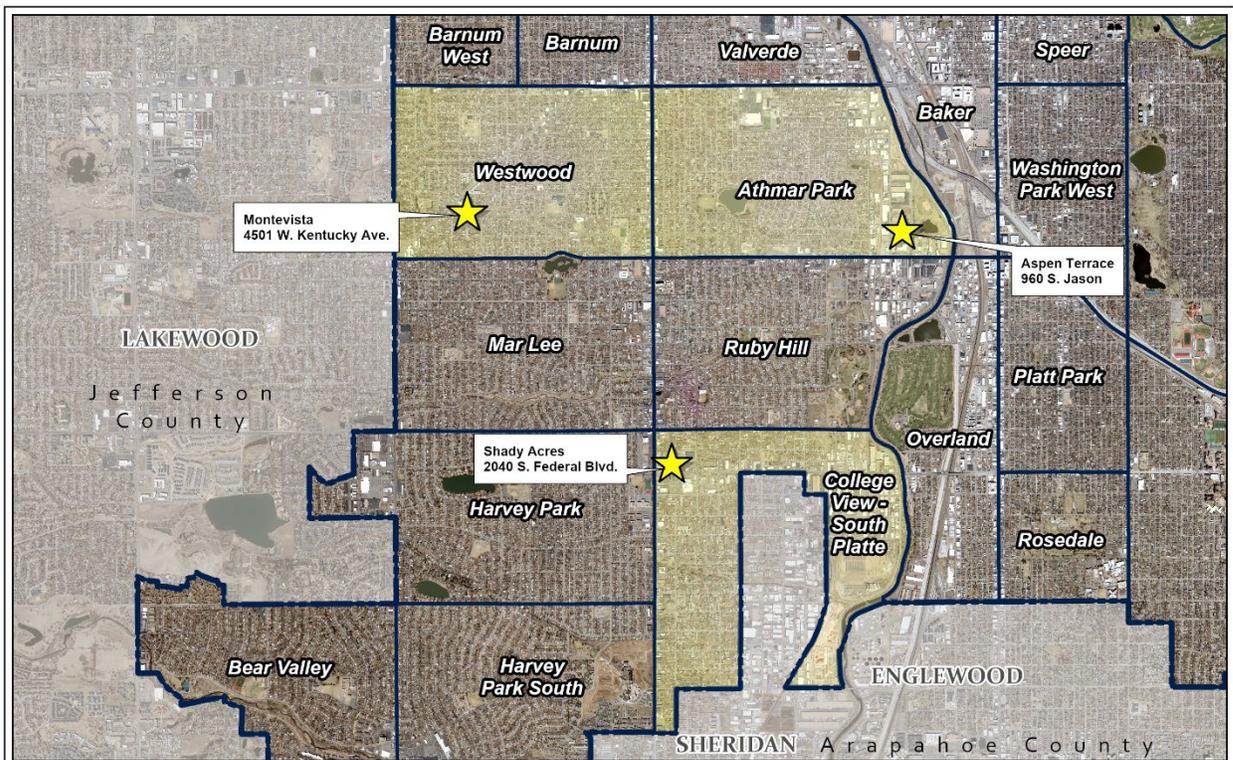
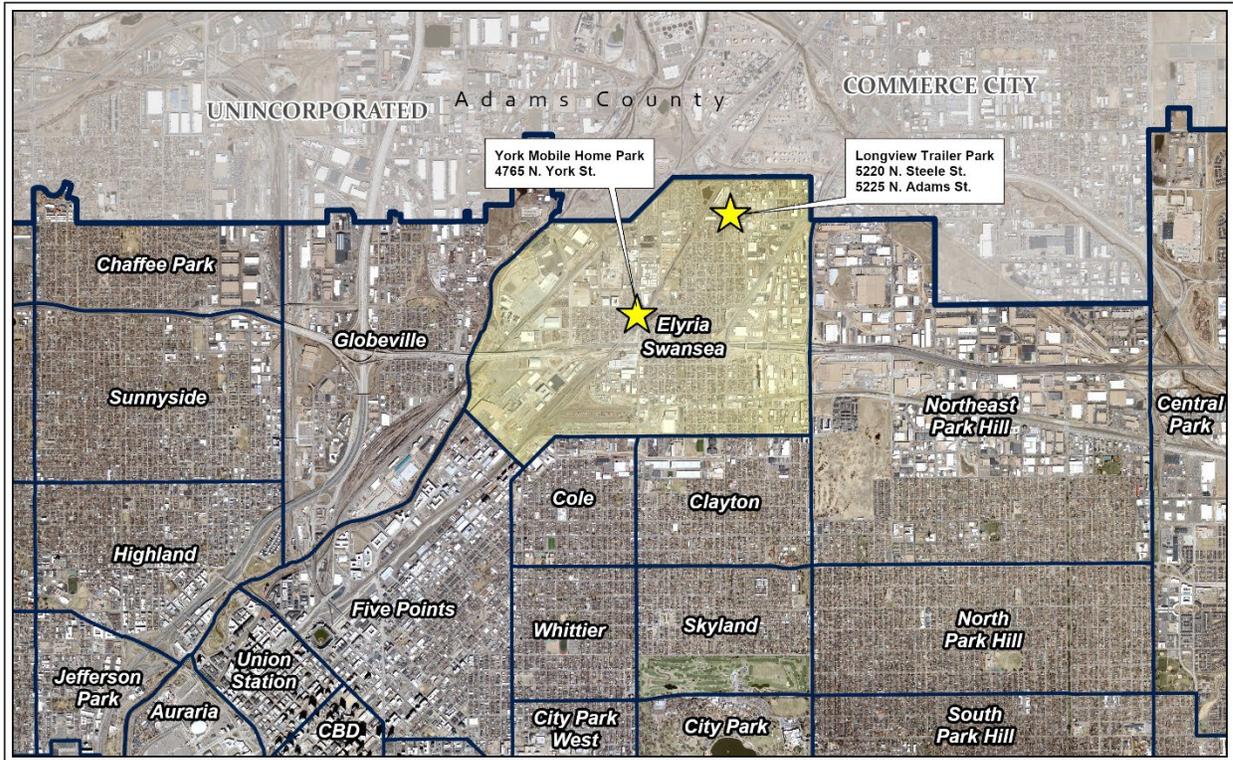
the five existing mobile home parks in the city. Mobile Home Parks are currently a non-conforming use in all zone districts.

According to DZC Section 12.4.10.2, "Except as otherwise provided in Section 9.4.2.1 and Section 12.3.3.9, no land may be rezoned into any zone district not established in this Code." According to DZC Section 12.3.3.9.C., "Notwithstanding Section 12.4.10.2, Zone Districts Not Available for Rezoning, creation of a new zone district by text amendment according to Section 12.4.11, Text Amendment, may, with the Manager's approval, be filed and reviewed concurrent with a map amendment according to Section 12.4.10, Official Map Amendment (Rezoning). In no case, however, shall a map amendment rezoning land into a new zone district be approved until the text amendment creating the new zone district is approved." CPD approved filing and reviewing this text amendment and map amendment proposal concurrently. Because the MHC zone district has not yet been established, the map amendment proposal shall not be approved until after City Council approves the text amendment to create the MHC zone district.

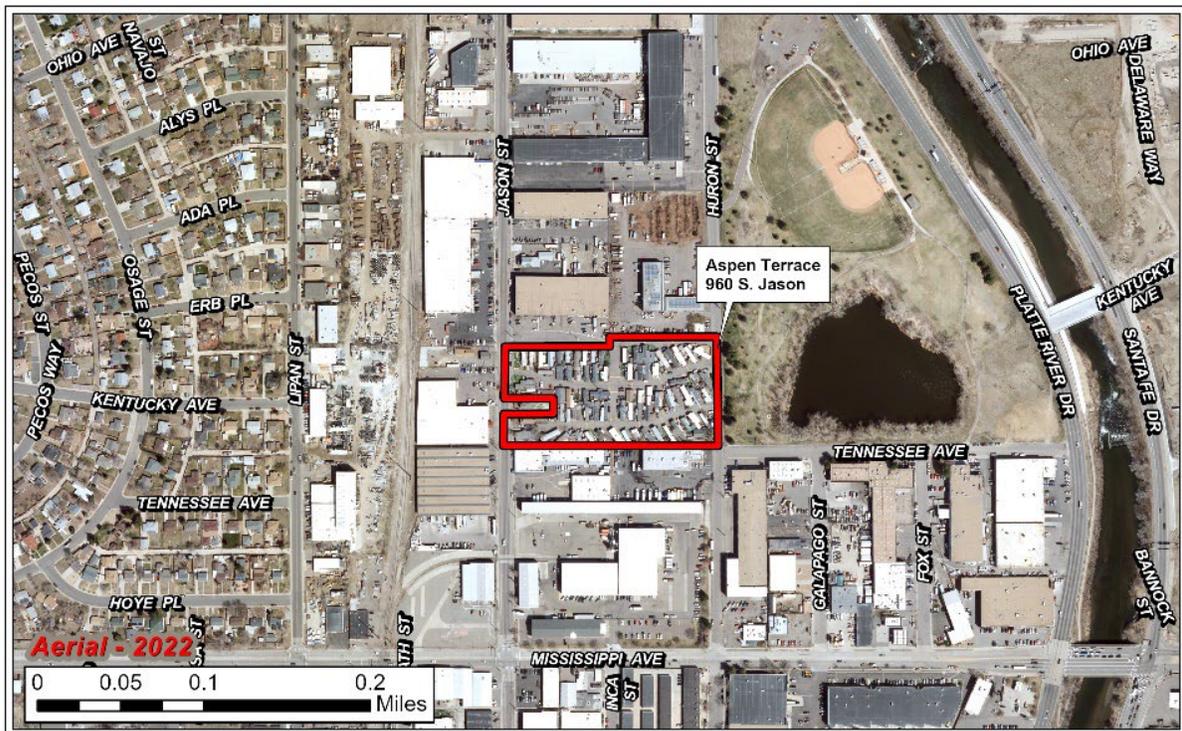
Further details of the zoning proposal can be found in the proposed zoning section of the staff report (below) and the attached draft text amendment.

Existing Context





Aspen Terrace



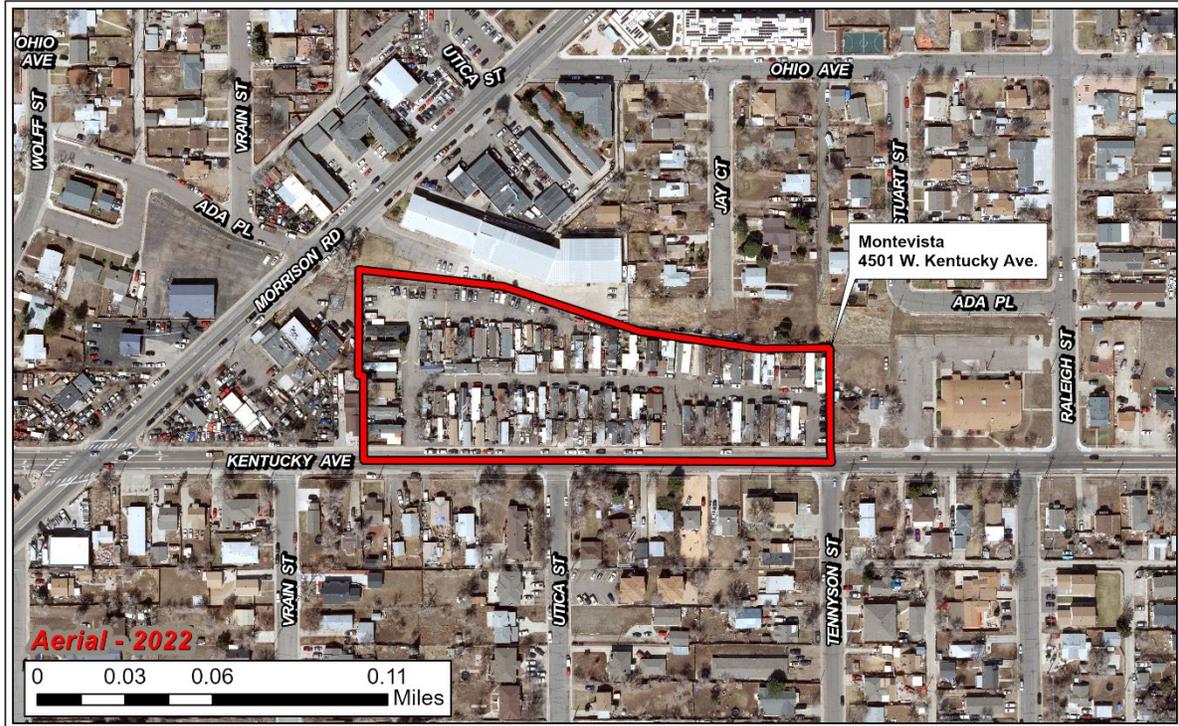
Located in Athmar Park, this community has 72 dwelling units. There are industrial land uses to the north, south, and west, and Vanderbilt Park is across Huron Street to the east. The subject property is within the West Central Manufacturing Preservation Area. Access is provided from S. Jason Street (collector), S. Huron Street (local), and W. Tennessee Avenue (local). RTD bus route 11 is along S. Jason Street, adjacent to the west, and bus routes 11 & 14 are along W. Mississippi Avenue, less than ¼ mile to the south. Surrounding properties are zoned I-A UO-2 with industrial uses and OS-A containing Vanderbilt Park & Lake.

Longview Trailer Park



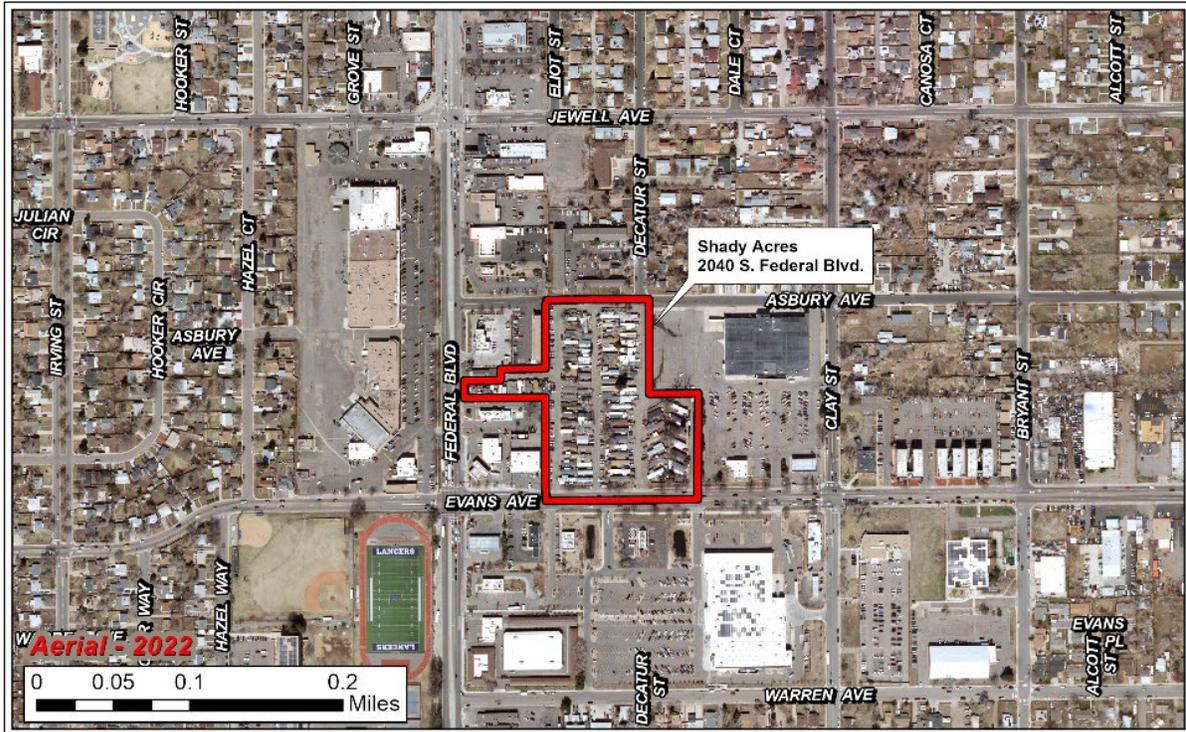
Located in Elyria Swansea, this community has 54 dwelling units. There are industrial land uses to the north, east, and west, single-unit residential uses to the southwest, and Lorraine Granado Community Park across 52nd Avenue to the south. This property is within the National Western Center East Manufacturing Preservation Area. Access is provided from N. Adams Street (local), N. Steele Street (local), and E. 52nd Avenue (local). RTD bus route 48 is along E. 52nd Avenue, adjacent to the south. Surrounding properties are zoned I-A UO-2 with industrial uses, E-SU-D with residential uses, and OS-A containing Lorraine Granado Park.

Montevista



Located in Westwood, this community has 80 dwelling units. This community recently changed their name from Capital City to Montevista. There is a variety of land uses surrounding the subject community with retail and single-unit residential uses to the north, auto repair/outdoor storage to the west, single-unit residential across Kentucky Avenue to the south, and a food bank to the east. Access is provided from W. Kentucky Avenue (collector) and W. Morrison Road (collector). RTD bus route 11 is along S. Kentucky Avenue, adjacent to the south, and bus route 4 is along W. Morrison Road. Surrounding properties are zoned E-MX-3 and E-TU-C with a mixture of industrial, commercial, and residential uses.

Shady Acres



Located in College View-South Platte, this community has 90 dwelling units. There are commercial uses surrounding the subject community with a King Soopers grocery store to the east. Access is provided from W. Evans Avenue (arterial), S. Federal Boulevard (arterial), and W. Asbury Avenue (local). RTD bus route 21 is along W. Evans Avenue, adjacent to the south, and bus routes 29, 30, 31, & 36 are along S. Federal Boulevard, adjacent to the west. Surrounding properties are zoned S-MX-3, S-MU-3, S-RH-2.5, S-SU-F1, and B-3 with a mixture of commercial and residential uses.

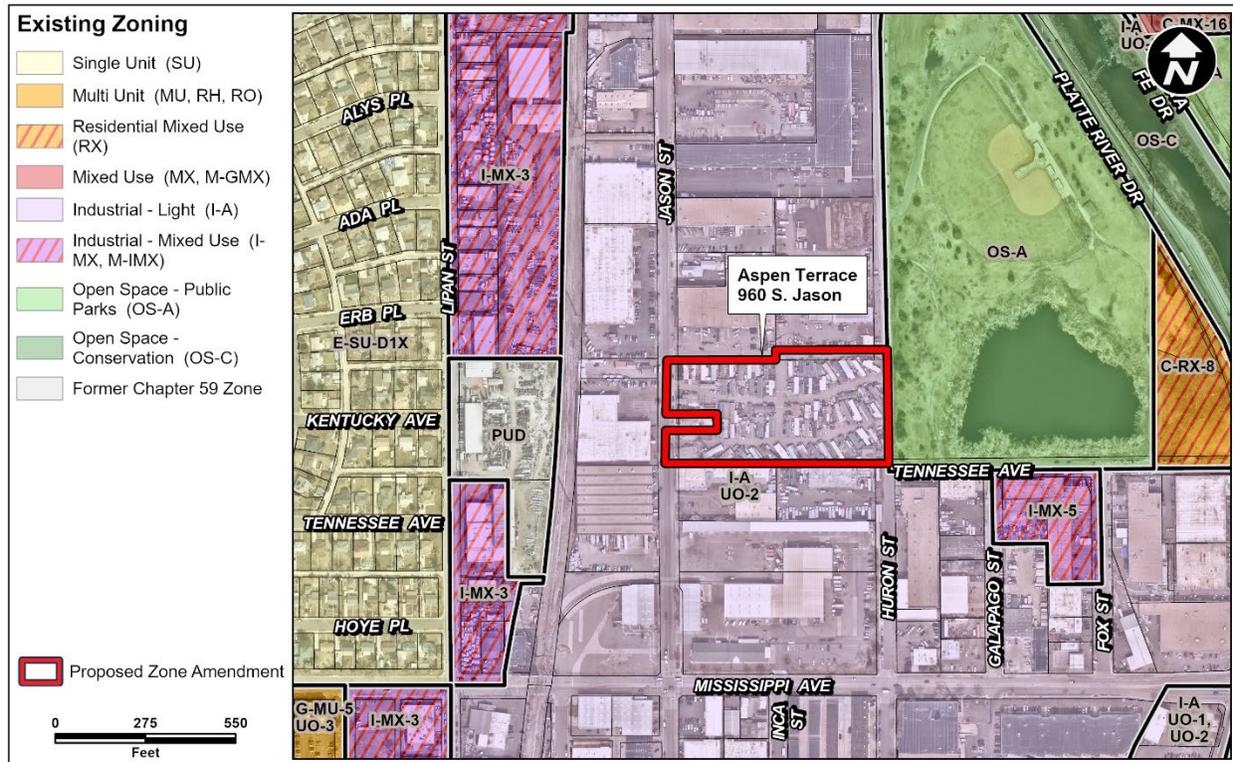
York Mobile Home Park



Located in Elyria Swansea, this community has eight dwelling units. There are industrial land uses to the north and east, two-unit residential to the west, and a vacant building to the south. Access is provided from E. 48th Avenue (local). RTD bus route 48 is along E. 48th Avenue, and bus routes 44 & 48 are along E. 47th Avenue which is one block southeast of the site. Surrounding properties are zoned E-TU-B with residential uses and I-B UO-2 with industrial uses.

1. Existing Zoning

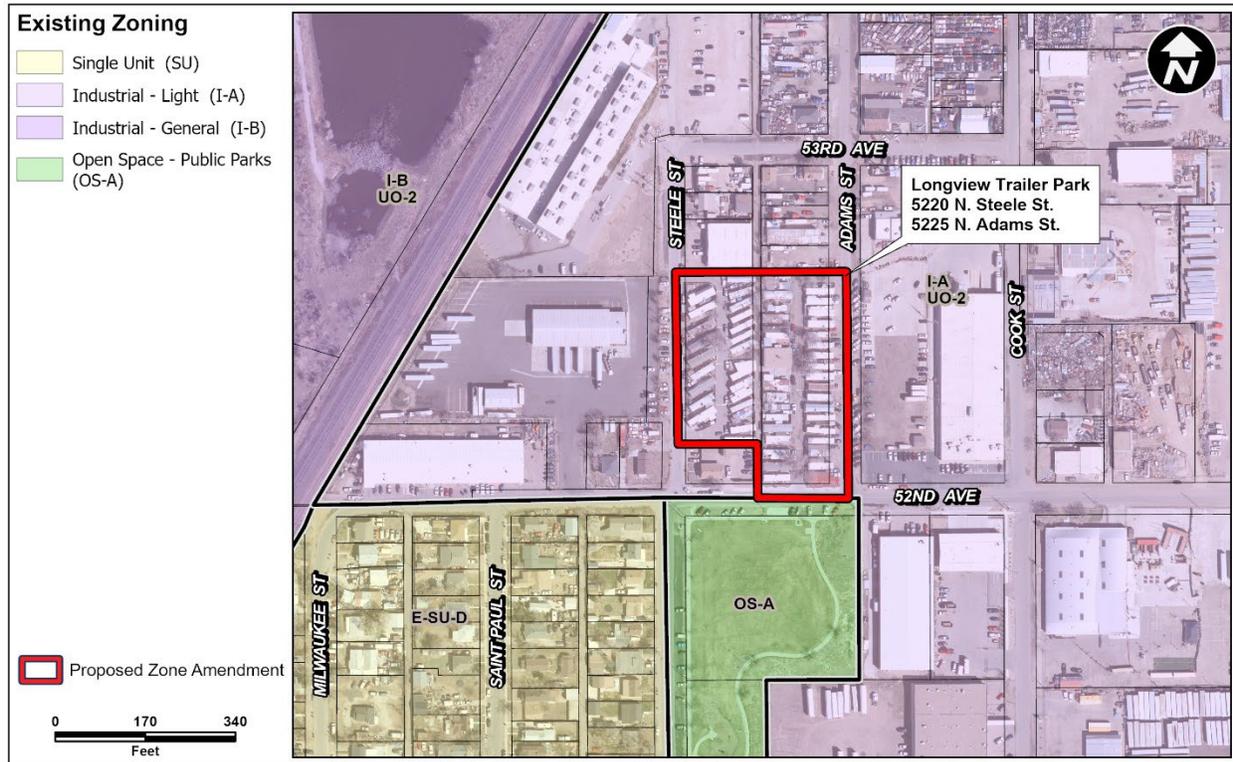
Aspen Terrace



Aspen Terrace is zoned I-A UO-2. I-A is a light industrial zone district in the Industrial Context. It allows office, business, and light industrial uses. Residential uses are only permitted where an existing residential structure existed prior to July 1, 2004. The General and Industrial building forms are allowed in the I-A zone district and building mass is regulated by a maximum Floor Area Ratio of 2.0. No maximum building height is specified for the zone district except for when a site is within 175 feet of a Protected District, in which case the maximum permitted building height is 75 feet. There are no build-to requirements, transparency requirements, or street level activation standards in the I-A zone district. Surface parking is permitted between the building and primary and side streets. See DZC Division 9.1 for more information.

Use Overlay 2 is the Billboard Use Overlay Zone District and permits billboard signs with certain limitations (DZC Section 9.4.4.7). Billboards, or Outdoor General Advertising Devices, in Use Overlay 2 are regulated via DZC Section 10.10.21. Billboards are limited to 45 feet in height and subject to spacing requirements ranging from 125-500 feet relative to residential districts/dwellings, public parks, and historic structures, and other billboard signs. No Outdoor General Advertising Device shall be located less than 125 feet from a residential district or a single or multiple unit dwelling (DZC §10.10.21.7).

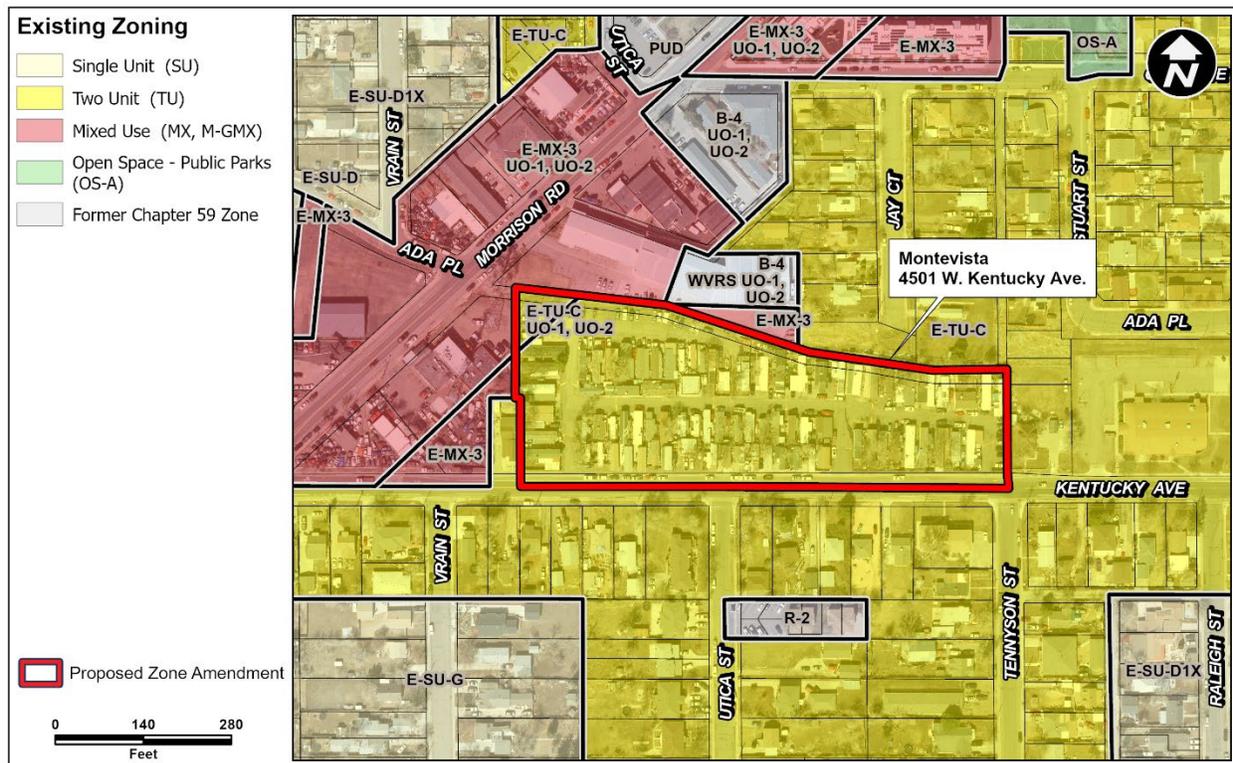
Longview Trailer Park



Longview Trailer Park is zoned I-A UO-2. I-A is a light industrial zone district in the Industrial Context. It allows office, business, and light industrial uses. Residential uses are only permitted where an existing residential structure existed prior to July 1, 2004. The General and Industrial building forms are allowed in the I-A zone district and building mass is regulated by a maximum Floor Area Ratio of 2.0. No maximum building height is specified for the zone district except for when a site is within 175 feet of a Protected District, in which case the maximum permitted building height is 75 feet. There are no build-to requirements, transparency requirements, or street level activation standards in the I-A zone district. Surface parking is permitted between the building and primary and side streets. See DZC Division 9.1 for more information.

Use Overlay 2 is the Billboard Use Overlay Zone District and permits billboard signs with certain limitations (DZC Section 9.4.4.7). Billboards, or Outdoor General Advertising Devices, in Use Overlay 2 are regulated via DZC Section 10.10.21. Billboards are limited to 45 feet in height and subject to spacing requirements ranging from 125-500 feet relative to residential districts/dwellings, public parks, and historic structures, and other billboard signs. No outdoor general advertising device shall be located less than 125 feet from a residential district or a single or multiple unit dwelling (DZC §10.10.21.7).

Montevista

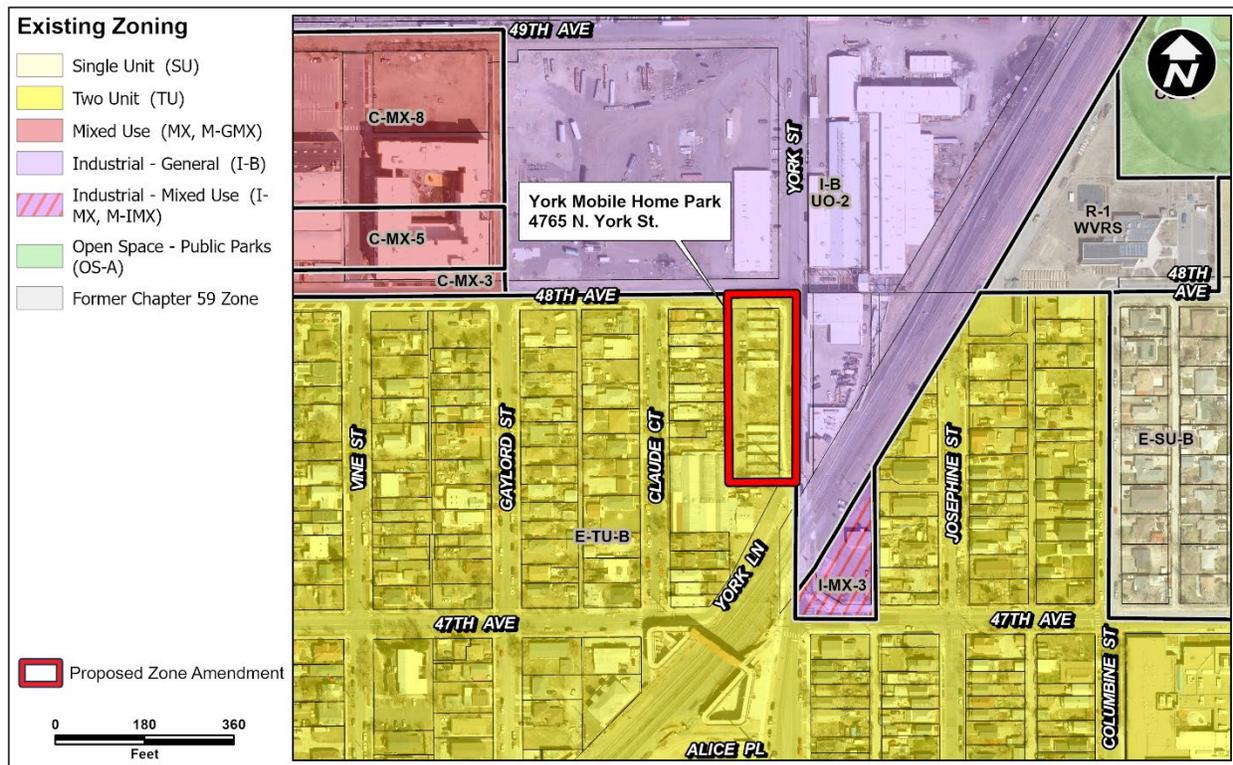


Montevista is zoned E-TU-C (Urban Edge-Two Unit-C) with the small northwest corner of the property zoned E-TU-C UO-1, UO-2. E-TU-C is a zone district that allows up to two units on a minimum zone lot of 5,500 square feet in the Urban House, Duplex, and Tandem House primary building forms. Zone lots with a width of 50 feet would allow for a 2.5 story building with a height of up to 35'. Additionally, the Urban House and Duplex forms allow for a maximum of 1 story or 17 to 19 feet in the rear 35% of the yard. The Tandem House form allows up to 24 feet in the rear 35%. The intent of the district is to promote and protect residential neighborhoods within the character of the Urban Edge neighborhood context. For additional details of the current zone district, please see Article 4 of the Denver Zoning Code

Use Overlay 1 is the Adult Use Overlay Zone District and permits adult business uses with certain limitations (DZC Section 9.4.4.6).

Use Overlay 2 is the Billboard Use Overlay Zone District and permits billboard signs with certain limitations (DZC Section 9.4.4.7). Billboards, or Outdoor General Advertising Devices, in Use Overlay 2 are regulated via DZC Section 10.10.21. Billboards are limited to 45 feet in height and subject to spacing requirements ranging from 125-500 feet relative to residential districts/dwellings, public parks, and historic structures, and other billboard signs. No Outdoor General Advertising Device shall be located less than 125 feet from a residential district or a single or multiple unit dwelling (DZC §10.10.21.7).

York Mobile Home Park



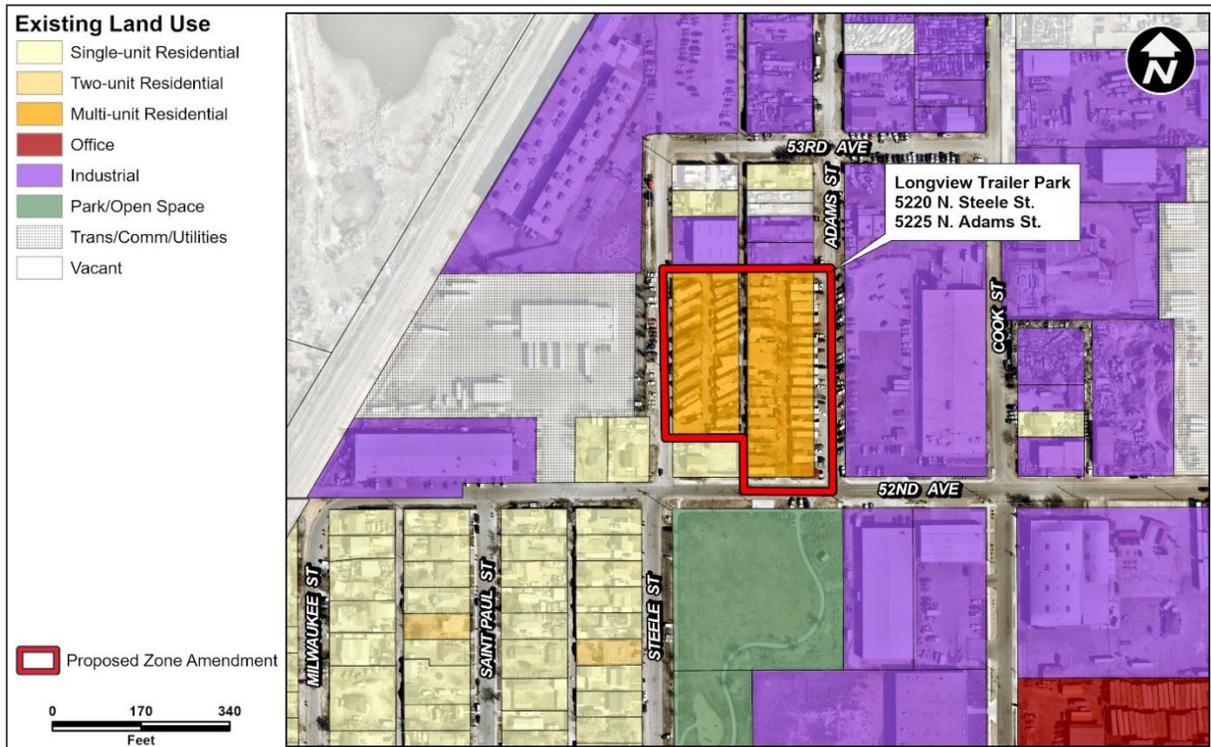
York Mobile Home Park is zoned E-TU-B (Urban Edge-Two Unit-B). E-TU-B is a zone district that allows up to two units on a minimum zone lot of 4,500 square feet in the Urban House, Duplex, and Tandem House primary building forms. Zone lots with a width of 35 feet allow for a 2.5 story building with a height of up to 30 feet and wider lots could allow for additional height up to 35 feet. Additionally, the Urban House and Duplex forms allow for a maximum of 1 story or 17 to 19 feet in the rear 35% of the yard. The Tandem House form allows up to 24 feet in the rear 35%. The intent of the district is to promote and protect residential neighborhoods within the character of the Urban Edge neighborhood context. For additional details of the current zone district, please see Article 4 of the Denver Zoning Code.

2. Existing Land Use Map

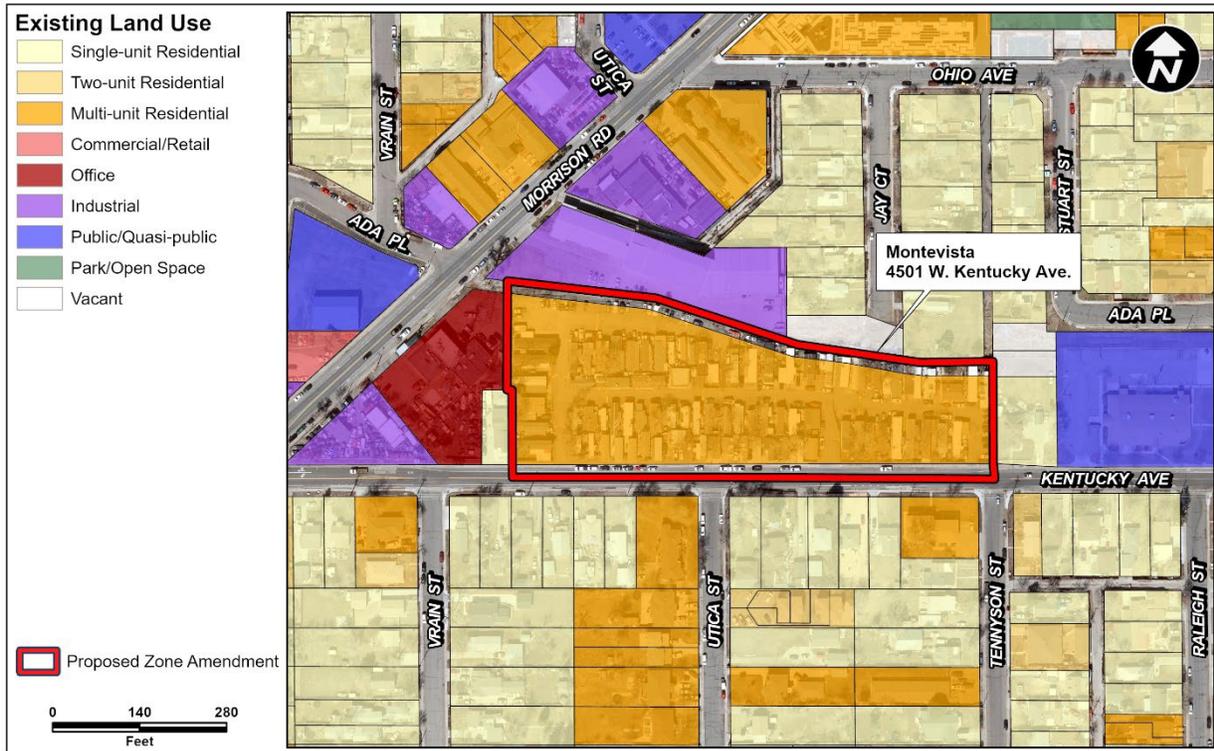
Aspen Terrace



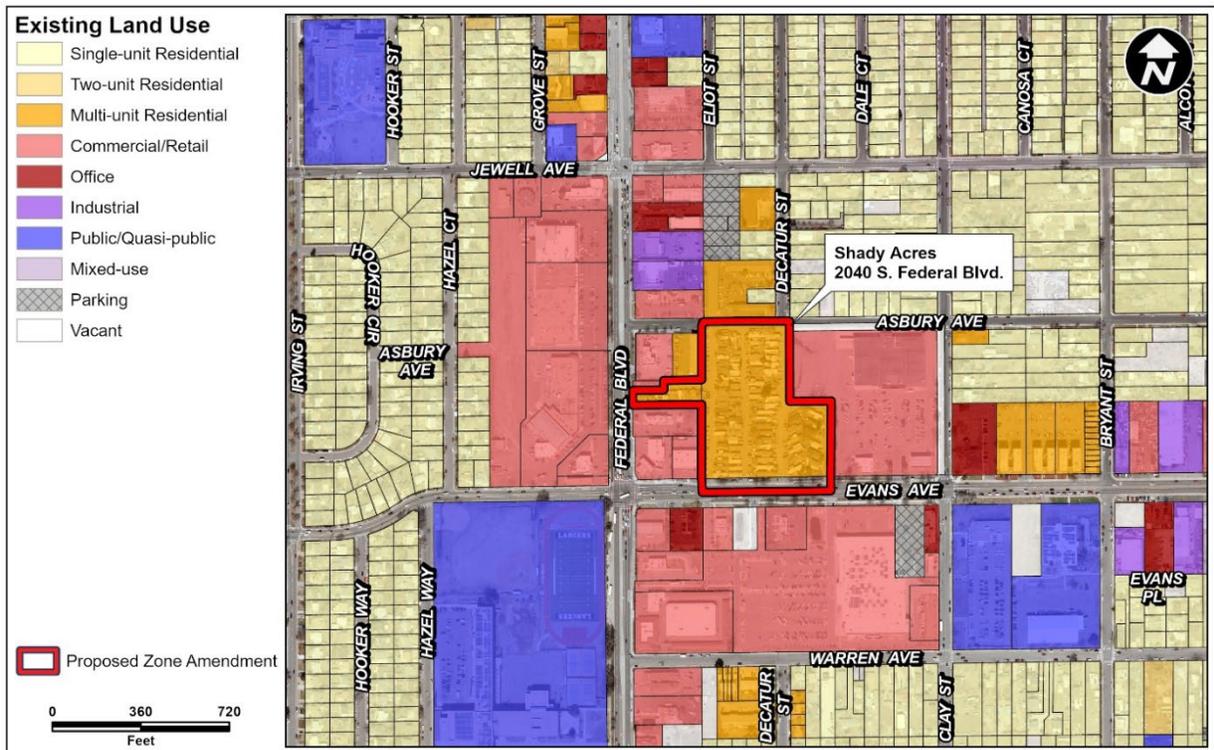
Longview Trailer Park



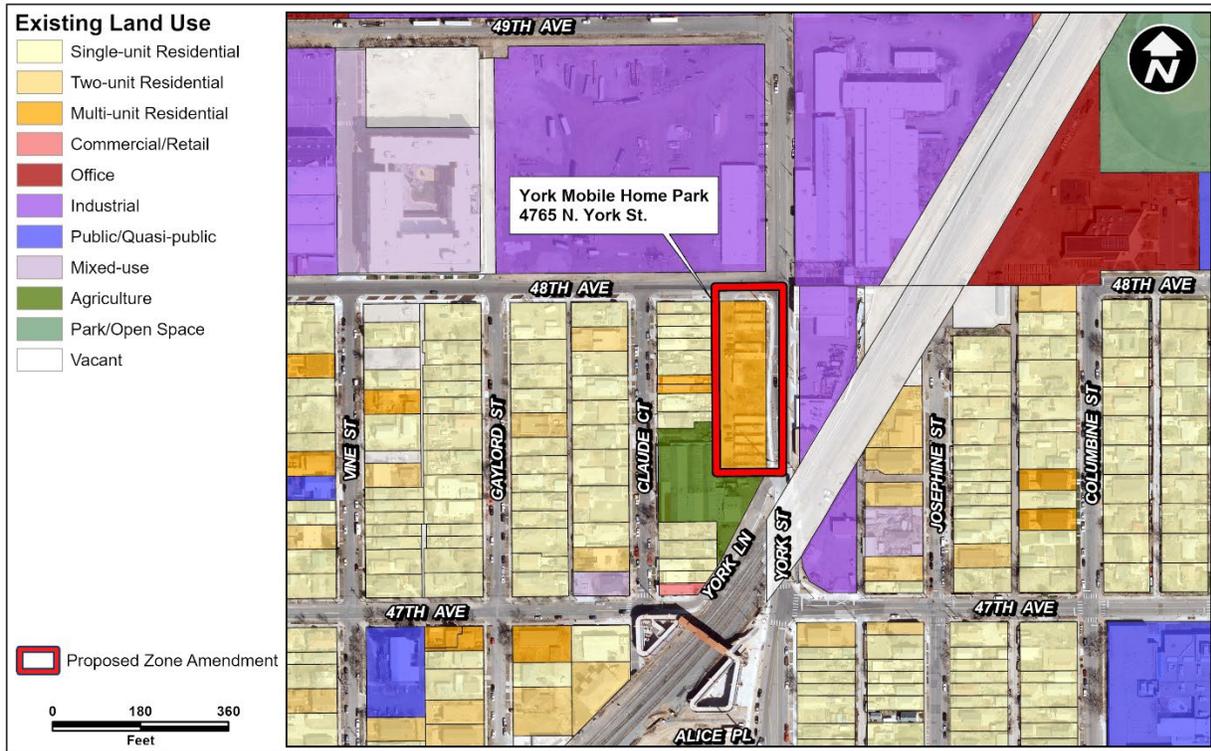
Montevista



Shady Acres



York Mobile Home Park



3. Existing Building Form and Scale

Aspen Terrace



View from the southeast corner of the community facing west. (source Google Maps)



View from the Jason Street to the west of the community facing southeast. (source Google Maps)

Longview Trailer Park



View from the 52nd Avenue to the south of the community facing north. (source Google Maps)



View from Adams Street to the northeast of the community facing south/southwest. (source Google Maps)

Montevista



View from the Kentucky Avenue to the south of the community facing north. (source Google Maps)



View from the Kentucky Avenue to the southwest of the community facing north. (source Google Maps)

Shady Acres



View from the Evans Avenue to the south of the community facing north. (source Google Maps)



View from the northwest of the community facing southeast. (source Google Maps)

York Mobile Home Park



View from 48th Avenue to the north of the community facing southeast. (source Google Maps)



View from York Street to the southeast of the community facing northwest. (source Google Maps)

Proposed Zoning (Text Amendment)

The proposed text amendment is mainly to portions of DZC Articles 2, 9, 10, 11, 12, & 13. The intent of the text amendment is to alleviate redevelopment pressure and make the land use conforming to current zoning regulations. The Manufactured Home Community (MHC) zone district is being proposed for Article 9: Special Contexts and Districts. Issues that this text amendment is addressing include:

- The zoning of the existing mobile home parks allows more intense development, which creates an incentive for investors to buy and redevelop existing mobile home parks.
- Mobile home parks are naturally occurring affordable housing and residents are at risk of involuntary displacement.
- The non-conforming use has been a barrier to financing for those residents looking to buy their park – encouraged per recent State legislative changes.

This text amendment will also modernize the terminology associated with this land use by deleting reference to “mobile home park” and introducing “manufactured home community” as the preferred nomenclature. Mobile homes are pre-1976 manufactured homes with the newest models nearly 50 years old. The replacement of manufactured homes at these locations is being made more feasible by exempting the zone district and/or replacement of a manufactured home dwelling unit from general design standards within Article 10 that could be difficult to meet, due to current site conditions.

Summary of City Agency Referral Comments

As part of the DZC review process, the rezoning application is referred to potentially affected city agencies and departments for comment. A summary of agency referral responses follows:

Community Planning and Development: Approved – No Comments

Assessor: Approved – No Response

Asset Management: Approved – No Comments

Denver Public Schools: Approved – No Response

Department of Public Health and Environment: Approved – No Comments

Denver Parks and Recreation: Approved – No Comments

Department of Transportation and Infrastructure: Approved – No Response

Department of Transportation and Infrastructure - City Surveyor: Approved - See Comments Below
Revised descriptions sent back to Project Manager. Descriptions revised to match vesting instrument language.

Development Services – Project Coordination: Approved – No Comments

Development Services - Fire Protection: Approved - See Comments Below

Increase in dwelling units should require a review from FIRE to assure ability to make access for emergency firefighting/medical needs.

Development Services – Transportation: Approved – No Response

Development Services- Wastewater: Approved – No Response

Outreach and Public Process

Community outreach for the Manufactured Home Communities project included an informational flyer and community meetings. Here is a complete list of meetings and outreach points:

Public Meetings

- Longview Mobile Home Park Meeting – June 27, 2024
- Shady Acres Open House – August 20, 2024
- Montevista Community Meeting – August 29, 2024

Planning Board and Mayor’s Office

- Planning Board Info Item – February 7, 2024
- Mayor’s Policy and Legislative Review Committee – May 3, 2024

Text Amendment Adoption Process Timeline

- Text Amendment Initiated – October 13, 2023
- Text Amendment Internal Agency Referral #1 – May 13, 2024
- Text Amendment Internal Agency Referral #2 – July 1, 2024
- Text Amendment Courtesy Public Review Draft – July 31, 2024
- Planning Board Hearing Public Notification – September 17, 2024
- Planning Board Public Hearing – October 2, 2024, **Recommended approval, unanimously**
- LUTI Committee – October 15, 2024
- Mayor Council – October 23, 2024*
- City Council First Reading – October 28, 2024*
- City Council Public Hearing – November 25, 2024*

* Anticipated dates are confirmed during the legislative review process and subject to change.

Review Criteria and CPD Staff Evaluation

The criteria for review of this text amendment and rezoning are found in DZC, Section 12.4.11.4 and Section 12.4.10.7, respectively. These criteria are summarized as follows:

1. Consistency with Adopted Plans
2. Public Health, Safety and General Welfare
3. Uniformity of District Regulations and Restrictions

Note: Because the City Attorney’s Office has determined this to be a legislative map amendment proposal, the additional criteria for non-legislative map amendments in DZC Section 12.4.10.8 do not apply.

1. Consistency With Adopted Plans

The proposed text and map amendment is consistent with the following adopted plans, strategies and policies:

- *Denver Comprehensive Plan 2040* (2019)
- *Blueprint Denver* (2019)
- Athmar Park Neighborhood Perimeter Plan (2000)
- Elyria & Swansea Neighborhoods Plan (2015)
- Westwood Neighborhood Plan (2016)

Denver Comprehensive Plan 2040

The proposed amendments are consistent with many *Denver Comprehensive Plan 2040* strategies, which are organized by vision element.

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 text amendment and 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.

Blueprint Denver (2019)

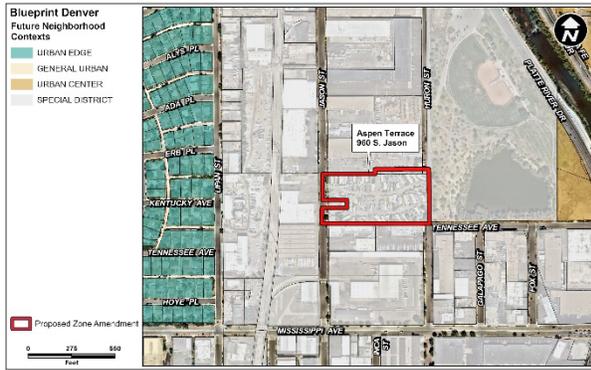
Blueprint Guidance Language:

- A. Future Neighborhood Contexts
- B. Future Place Types
- C. Street Types
- D. Growth Area Strategy
- E. Plan Policies and Strategies
- F. Equity Concepts

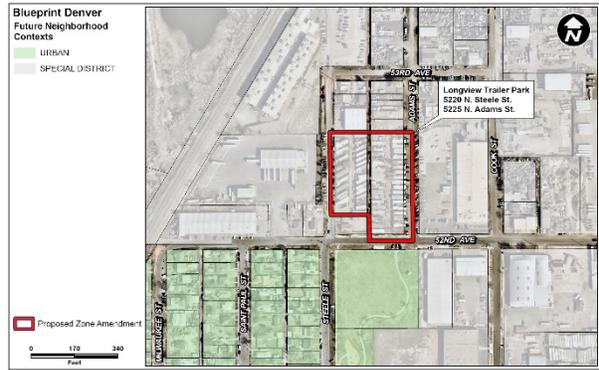
A. Blueprint Denver Future Neighborhood Contexts

In *Blueprint Denver*, future neighborhood contexts are used to help understand differences between land use, built form, and mobility. The subject proposal is unique because the existing

communities are scattered throughout the city and located within different future neighborhood contexts (Local Center, Special District, Suburban, and Urban). The MHC zone district is being proposed for inclusion within Article 9 of the Denver Zoning Code, Special Contexts and Districts, and intended to only apply to these existing locations. The MHC district is appropriate for any of the future neighborhood contexts.



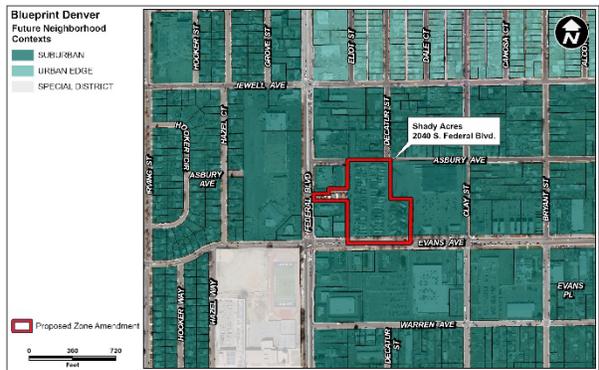
Aspen Terrace: Future Neighborhood Context is Special District



Longview Trailer Park: Future Neighborhood Context is Special District



Montevista: Future Neighborhood Context is Urban Edge



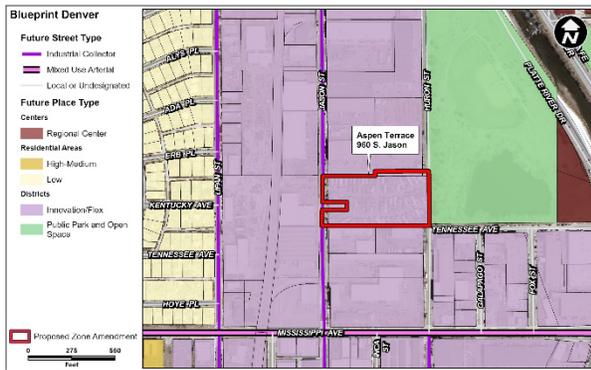
Shady Acres: Future Neighborhood Context is Suburban



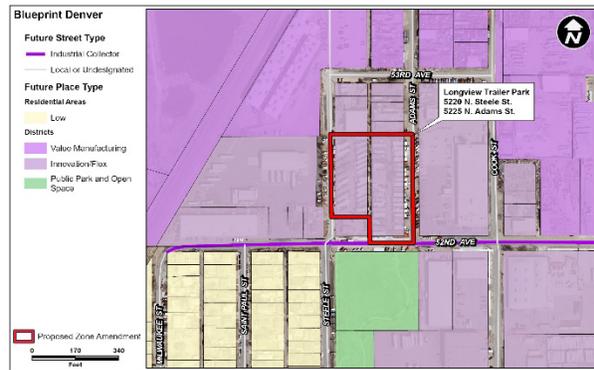
York Mobile Home Park: Future Neighborhood Context is Urban

B. Blueprint Denver Future Place Type

In Blueprint Denver, future place type descriptions help to determine the appropriateness of a proposed zone district. Similar to the neighborhood contexts, the existing manufactured home communities have several future place types associated with them (Community Corridor, Community Center, Local Center, and Innovation/Flex). The MHC zone district is being proposed for inclusion within Article 9 of the Denver Zoning Code, Special Contexts and Districts, written to only apply to these existing locations, and customized to existing communities. The Southwest and Far Southwest area plans, currently in progress, are considering the opportunity to update the future place types of the Aspen Terrace and Shady Acres communities to a residential future place type to make it more difficult to rezone the communities to something other than MHC in the future.



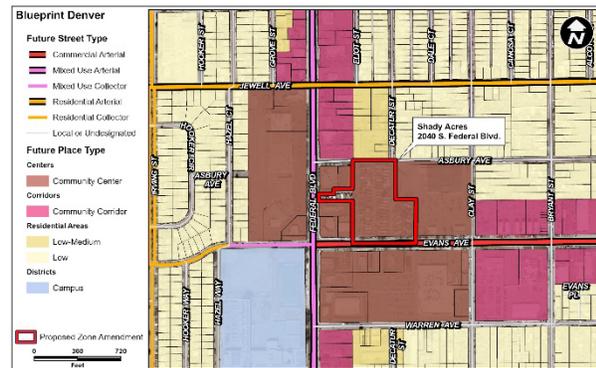
Aspen Terrace: Future Place Type is Innovation/Flex



Longview Trailer Park: Future Place Type is Innovation/Flex



Montevista: Future Place Type is Community Corridor



Shady Acres: Future Place Type is Community Center



York Mobile Home Park: Future Place Type is Local Center

C. Blueprint Denver Future Street Types

In Blueprint Denver, future street types work in concert with future places to evaluate the appropriateness of the intensity of the adjacent development (pg. 67). The three volume classifications of Local, Collector, and Arterial, are further refined by six types of surrounding context. The future street types adjacent to each of the subject properties are as follows:

Aspen Terrace: S. Huron St. (Local), S. Jason St. (Industrial Collector), W. Tennessee Ave. (Local)

Longview Trailer Park: E. 52nd Ave. (Industrial Collector), N. Steele St. & N. Adams St. (Local)

Montevista: W. Kentucky Ave. (Residential Collector), W. Morrison Rd. (Mixed Use Collector)

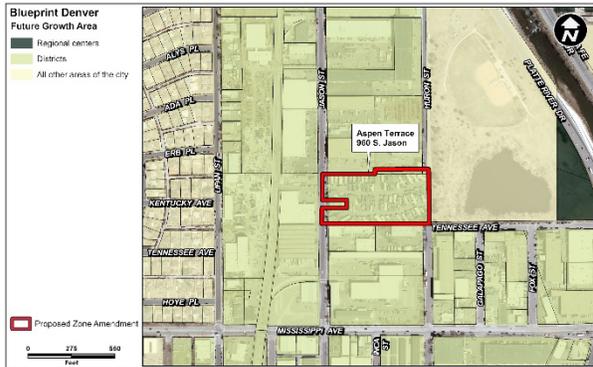
Shady Acres: S. Federal Blvd. (Mixed Use Arterial), W. Evans Ave. (Commercial Arterial), W. Asbury Ave. (Local)

York Mobile Home Park: N. York St. (Mixed Use Arterial), E. 48th Ave. (Local)

The proposed rezoning is intended to help the existing communities, which have existed for decades in their locations, stay in place, and the future street types are less relevant for the purpose of this project. However, four of the communities are adjacent to Local streets while one is adjacent to a Residential Collector, which are appropriate street types to serve these residential communities.

D. Blueprint Denver Growth Strategy

Blueprint Denver's growth strategy map is a version of the future places map, showing the aspiration for distributing future growth in Denver (pg. 51). The subject properties are located in different future growth areas: Community Centers & Corridors (Capital City & Shady Acres), Districts (Aspen Terrace & Longview), and All other areas of the city (York). These growth areas anticipate 5% to 25% of new households in the city by 2040. The proposed text and map amendments will help encourage preservation of the existing manufactured home communities, consistent with the intent of these growth areas to maintain housing.



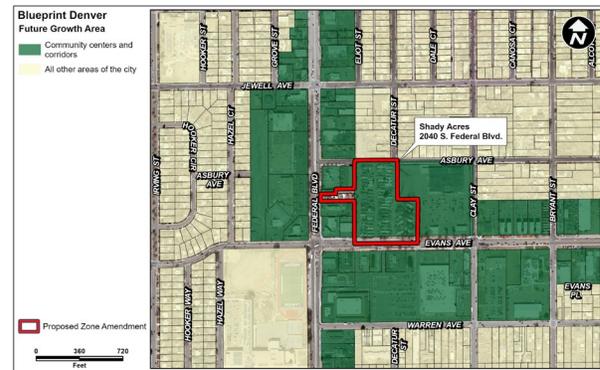
Aspen Terrace: Future Growth Area is Districts



Longview Trailer Park: Future Growth Area is Districts



Montevista: Future Growth Area is Community centers and corridors



Shady Acres: Future Growth Area is Community centers and corridors



York Mobile Home Park: Future Growth Area is All other areas of the city

E. Blueprint Denver Plan Policies and Strategies

Blueprint Denver contains numerous recommendations related to mitigating involuntary displacement, proactively implementing plan goals, and encouraging affordable housing. The proposed rezoning is consistent with the following policies and strategies:

Land Use and Built 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 Built Form: General Policy 11

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

Land Use and Built 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)

Land Use and Built Form: Housing Policy 3, Strategy A

Implement zoning tools to incentivize the preservation of smaller, more affordable housing options. (p. 83)

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, Montevista 3.1, Longview 2.4, Shady Acres 3.2, and York 2.9. The text and map amendments ensure 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. The scores for the subject properties are: Aspen Terrace 2, Montevista 3, Longview 3, Shady Acres 3, and York 3. This is the main equity concept that the proposed text and map amendments are 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, Montevista 3, Longview 2, Shady Acres 4, and York 3. The proposed text and map amendments will ensure that the existing manufactured home communities continue to contribute to the housing diversity of the surrounding areas.

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 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 text and map amendments help to maintain or increase the job diversity for the subject properties by allowing several home occupations within the MHC zone district.

Staff finds that these text and map amendments are guided by the key equity concepts. These amendments will improve access to opportunity by making manufactured home communities a conforming land use. They will reduce vulnerability to displacement by having a Manufactured Home Community as the only allowed primary use for the MHC zone district. These amendments will make the replacement of manufactured homes and overall site improvements a more feasible option, which maintains housing diversity. The MHC zone district will also formally allow home occupations.

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 to other land uses and making the replacement of manufactured homes exempt from costly site improvements and design standards.

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 text and map amendments seek to provide stability for the manufactured home communities and supports the preservation of the neighborhood character.

Elyria & Swansea Neighborhoods Plan

The Longview Trailer 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 text and map amendments add to the diversity of housing types available for all ages and income levels and help 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 text and map amendments will solidify manufactured homes as a housing option for the Montevista community.

2. Public Health, Safety and Welfare

The text and map amendments further 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. This proposed text amendment removes an inequitable regulatory barrier by creating a new zone district, allowing the existing manufactured home communities to be a conforming use within the DZC.

3. Uniformity of District Regulations and Restrictions

The text and map amendments will result in updated regulations that are uniform within each zone district. 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.

Attachments

1. LUTI review draft of the MHC text amendment