



Root Policy Research

7713 E. 8th Place, Denver, CO 80230

www.rootpolicy.com

970.880.1415

Aurora Mobile Home Task Force Findings and Recommendations



PREPARED BY

Root Policy Research

On behalf of the Aurora Mobile Home Task Force

REPORT

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TABLE OF CONTENTS

Introduction

Background	1
Aurora MHTF Purpose.....	1
Aurora MHTF Agreements.....	1

Task Force Members.....2

Housing Needs in Aurora

Demographics	3
Market Conditions	4
City-Wide Needs.....	5
Consultant Recommendations from the 2018 Housing Market Study	6

Mobile Homes in Aurora

Mobile Home Market	7
Zoning.....	8
State-Wide Trends	9
State Regulation.....	10
Resident Perspectives	10

Aurora MHTF Process

Phase I: Information and Education.....	13
Phase II: Identify Issues and Solutions.....	14
Phase III: Best Practices and Recommendations.....	15
Phase IV: Prioritization of Recommendations and Implementation Options	16
Phase V: Presentation of Recommendations and Completion of Report.....	16

MHTF Key Findings and Recommendations

Things You Should Know About Mobile Homes	17
Critical Needs	18
Aurora MHTF Recommendations	19

INTRODUCTION

BACKGROUND

On April 9, 2018, the Aurora City Council unanimously approved a 10-month moratorium on the acceptance and approval of development applications for redevelopment on sites that are currently occupied by existing mobile home parks. In addition, the Council approved the creation of an 8-member task force, to run concurrently with the moratorium, to study the lack of affordable housing in Aurora and to make recommendations of possible solutions to the displacement of mobile home park residents due to closures, rezoning, and redevelopment.

This report contains a summary of the efforts of the Aurora Mobile Home Task Force (MHTF) as well as the Task Force's findings and recommendations. The report is organized around the following sections:

- I. Introduction
- II. Task Force Members
- III. Housing Needs in Aurora
- IV. Task Force Meetings and Process
- V. Key Findings and Recommendations

Note: Throughout this report the terms “mobile home” and “manufactured home” are used interchangeably. Technically “mobile home” refers to homes built before 1976 and “manufactured housing” applies for units built after 1976. However, the terms are commonly used interchangeably and we have followed that practice here.

AURORA MHTF PURPOSE

The Aurora MHTF members agreed upon the following statements of purpose:

- Get more manufactured home community members involved in the conversation regarding affordable housing issues and potential solutions.
- Generate solutions for the shutdown of mobile home communities along Colfax.
- Make recommendations on how to move and/or rehome displaced mobile home owners.
- Assess a variety of affordable housing options, including the option of finding land to move trailers to.
- Communicate effectively with City Council members about the recommendations of the Task Force.

AURORA MHTF AGREEMENTS

The Aurora MHTF members adopted the following agreements to guide their collaborative efforts:

- There are many ways to listen to perspectives of others.
- Invite everyone to listen like your life depends on it.
- When there is lack of consensus amongst the group, indicate majority consensus and minority consensus so that the City Council can see all perspectives.
- Create a framework for discussion so everyone knows legalities.

TASK FORCE MEMBERS

The Aurora Mobile Home Task Force met 15 times between April of 2018 and February of 2019. These meetings were facilitated by Wendy Talley of Talley & Associates. Spanish language interpretation was provided at each meeting. The following community members serve on the Aurora Mobile Home Task Force:

Brian Arnold- Mr. Arnold is the program Director of Ready to work Aurora, a transitional and work force housing organization. As a representative of a nonprofit affordable housing advocacy group, his goal is to ensure that homeless residents are well represented

Petra Bennett- Ms. Bennett has lived in mobile home parks for over 20 years and provides a resident's perspective on the issues that are being addressed by the task force.

Andrea Chiriboga Flor- Ms. Chiriboga-Flor is the Senior Housing Organizer for 9to5 Colorado, a grassroots member-based organization dedicated to fighting for women's rights on a local and state level. She has taken on housing as her main area of work as the housing crisis has progressed throughout Colorado. Most of her work is centered around rights for mobile home owners, community control of land, and tenant rights.

Nancy Flores- Ms. Flores is a resident of a mobile home park in Aurora and serves on the homeowners' association of the park that she resides in. She is interested in learning more about how the City works on these issues, what her rights are as a mobile home resident, and what else can be done for residents facing a lack of affordability in housing so that others don't have to face the same issues she faced.

Luz Galicia- Ms. Galicia is a resident of a mobile home park in Aurora and serves on the Neighbors United group of the park that she resides in. She believes that, by working together, the Task Force can make things better for working families.

Craig Maraschky- Mr. Maraschky has been the Executive Director of the Aurora Housing Authority for 11 years. The Housing Authority provides rental assistance and affordable housing to approximately 3,000 families in the City and has an operating budget of \$50 million.

Mark Marshall- Mr. Marshall is the Real Estate Director at Urban Land Conservancy (ULC) and brings over 30 years of experience in the real estate/building/development industry. Through his professional background and his current role at Urban Land Conservancy, Mr. Marshall brings a unique perspective to the conversation as well extensive experience in advocating for and creating affordable housing.

Victoria Medisch- Ms. Medisch is a resident of a mobile home park in Aurora. She believes that it should be a human right to have a roof over one's head.

*It should be noted that **John Dikeou** represented mobile home park owners on the Task Force but only attended two Task Force meetings and is, therefore, not listed as a full member. **Marisela Hernandez** was appointed to the Task Force but did not attend any meetings.*

HOUSING NEEDS IN AURORA

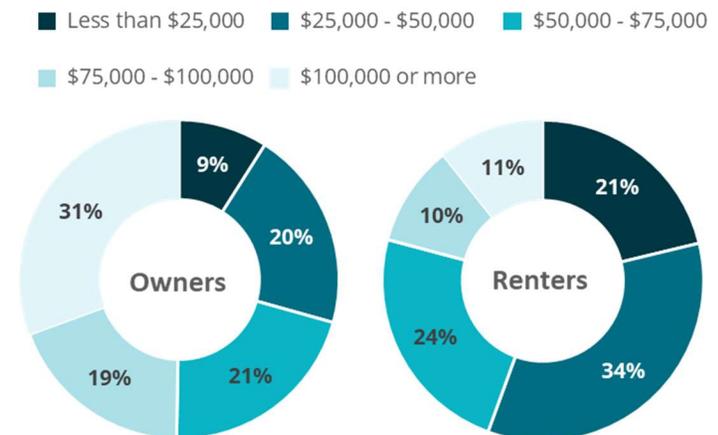
The City of Aurora completed a Housing Market Analysis in 2018. The study results—including top needs and recommendations to address those needs were presented to City Council in 2018. Key findings from that study, along with additional detail on mobile homes in Aurora, are summarized here to provide context for the MHTF’s recommendations.

DEMOGRAPHICS

- Aurora has experienced strong population growth over the last few decades, with population increasing 2.2 percent annually between 2000 and 2016.
- Two-thirds of all Aurora households are families and half of those have children. Single parents constitute one-third of all families with children.
- Aurora is the most diverse city in the Denver metro area, if not the Intermountain West. The city houses a significant share of the state’s refugee population, with a sizable number of Ethiopian, Eritrean, and Nepalese residents.
- In 2016, 56 percent of Aurora’s population belonged to a minority group—29 percent were Hispanic residents and 15 percent were Black or African American. The proportion of Aurora’s population that identified as minority has also increased from 2000 to 2016 (from 43% to 56%).
- The City’s racial and ethnic diversity, coupled with the City’s diversity in housing prices, is likely to be a key asset in economic development, as employers and workers increasingly require and demand global awareness and broad skill sets.
- According to the 2016 American Community Survey, Aurora has a relatively low median income (\$59,467)

compared to the state (\$65,685) and the Denver metro overall (\$71,926). However, over the last 16 years, the income distribution of Aurora households has shifted toward higher income ranges, indicating higher income households moved to the City or existing households are earning more.

Figure 1.
Income by Tenure, Aurora, 2016



Source: 2016 American Community Survey and Root Policy Research.

HOUSING NEEDS IN AURORA

MARKET CONDITIONS

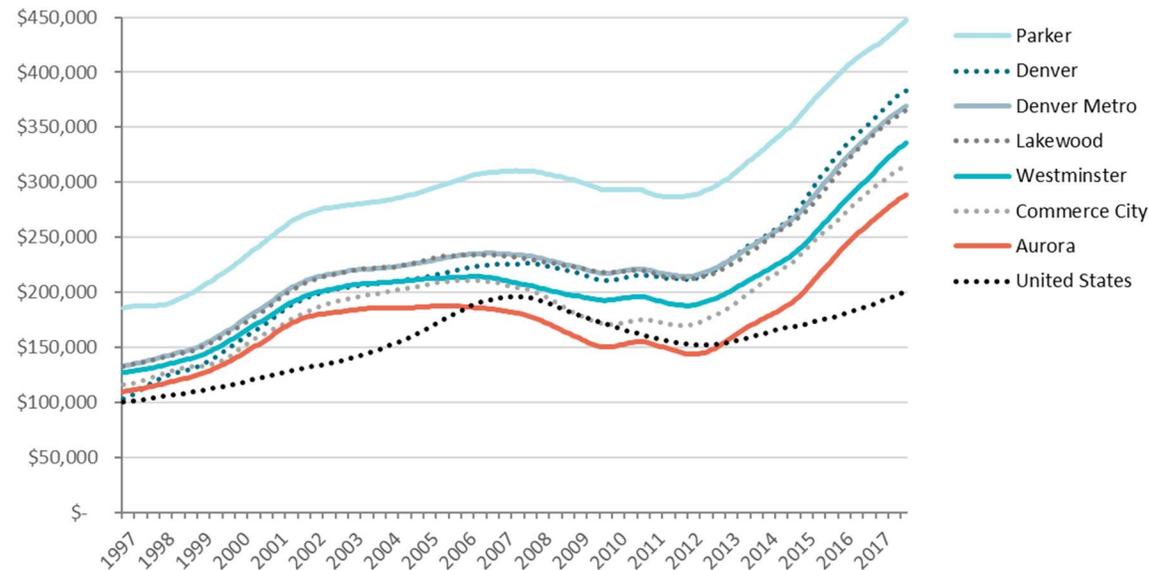
- Aurora stands out as offering a unique variety of homes in multiple settings—city, suburban, and rural.
- Aurora’s diverse housing stock is in part due to the city’s success in attracting residential development by imposing fewer constraints than other communities, particularly for single family homes. Multifamily development tends to be more volatile—high vacancy rates in 2009 slowed multifamily permitting, which has not recovered since the recession.
- Unlike other suburban cities in the metro Denver area, Aurora has a fairly balanced proportion of owners (57%) and renters (43%) due to the increasing proportion of renter households. Although the rental population in Aurora is growing, development trends

do not show that the housing stock is keeping up with the demand for rentals.

- Current development trends that favor single family homes and larger apartment complexes could reduce the future share of renters occupying attached units. This may adversely affect low income families, who also need moderately sized affordable rentals in neighborhood settings.
- Although Aurora has experienced similar homeowner price trends compared to peer communities, Aurora remains to be one of the most affordable cities in the metro area, particularly for attached housing units. Yet, if a resident tried to purchase a home in Aurora today, prices are just as competitive as peer communities.

Figure 2.
Median Home Sale Price, Aurora and Peer Communities, 1997 to 2017

Source:
Zillow median sale price and
Root Policy Research



HOUSING NEEDS IN AURORA

- Alternative housing products—attached homes, small lot homes, and mobile homes—can be more affordable than more traditional housing types, but may be older, have additional monthly costs (such as lot fees for mobile homes), or are less frequently available for purchase.
- Over the last 15 years, Aurora experienced a decline in low income renters making less than \$35,000 annually, either because they moved out of the City or moved up in income categories. During this same period, there was also a loss of naturally occurring affordable housing, which affects renters who are still below the poverty line but may not qualify for subsidized units.

The private rental market in Aurora largely serves renters earning between \$35,000 and \$75,000 per year and the market fails to adequately serve renters earning less than \$35,000 per year—even when accounting for the impact of subsidized housing programs.

Figure 3.
Median Rent, Aurora and Peer Communities, 2016



Source: 2016 American Community Survey and Root Policy Research.

CITY-WIDE NEEDS

The top city-wide housing needs identified in the 2018 Aurora Housing Market Study are:

1. Additional affordable rentals (or rental assistance), specifically for residents earning less than \$20,000—Aurora currently has a shortage of 6,520 units priced below \$500 per month.
2. More rentals for residents earning between \$20,000 and \$35,000. Between 2000 and 2016, there was a large loss of naturally occurring affordable housing, which affects renters who are still below the poverty line but may not qualify for subsidized units.
3. Rental units increasingly lost from the inventory and contributing to displacement caused by investors selling rental units. Aurora has a much higher proportion of renters who have had to move because their landlord sold their home than in Denver or the Boulder areas.
4. Starter homes and family homes priced near or below \$250,000. Increasing the variety of product types in Aurora (smaller single family homes and single family attached products) may help meet this need.

HOUSING NEEDS IN AURORA

CONSULTANT RECOMMENDATIONS FROM THE 2018 HOUSING MARKET STUDY

The 2018 Housing Market Study suggests the following recommendations to address housing needs throughout Aurora. Note that Recommendation 6 specifically applies to mobile home regulations.

- 1. Expand downpayment assistance.** Provide more downpayment assistance for both new homebuyers and low to moderate income families. Higher amount if analysis shows would move more people into ownership.
- 2. Create a land bank with existing or acquired land for redevelopment.**
 - Consider a land banking program that makes use of vacant land and underutilized properties along aging corridors (e.g., East Colfax), prioritizing those likely to redevelop and lose affordability as a result of private and public sector investment
 - Identify 3-7 land parcels that are owned or could be acquired by the City for housing development by December 2018
 - Create priorities for acquisition, e.g., bridge/transitional housing for those experiencing eviction by reforming existing motels; housing for persons with disabilities; parcels that facilitate mixed income housing near jobs and transit
- 3. Create a program (potentially working with a CDFI) to subsidize construction of ADUs rented as affordable housing,** including to family members who are under-housed/at risk of homelessness.
- 4. Small landlord incentive program.** Consider a small landlord incentive program that provides rehabilitation, weatherization, and/or home improvements to landlords in exchange for keeping rents affordable for a set time period.
- 5. Work with area churches to facilitate creation of tiny home communities in existing parking lots and land.** Prioritize creating alternative housing solutions (co-op housing) that add to the inventory of housing for persons with disabilities and people at risk of homelessness. These should include tiny home villages with wrap around services, such as the Community First Village in the Austin region (unincorporated county). Some may be targeted to residents with criminal backgrounds using best practices from successful re-entry models.
- 6. Examine current regulations.** Examine regulations, such as those existing in Bend, OR, to require redeveloped mobile home parks to have an affordable housing set aside.

MOBILE HOMES IN AURORA

The following discussion relies heavily on the mobile home analysis included in the 2018 Aurora Housing Market Study along with additional resources reviewed by the MHTF and resident perspectives provided by the MHTF.

MOBILE HOME MARKET

Mobile homes are a form of naturally occurring affordable housing that allow lower income residents to become homeowners. Although this creates more housing opportunity for these households, mobile home parks can also be an environment of uncertainty. Most mobile home owners do not own their land and have to pay a monthly rent for the lot, subjecting tenants to the volatility of the housing market that could make monthly payments unaffordable.

Increasing home and land values in the metro Denver has also given mobile home park owners a large incentive to sell, putting additional pressure on tenants who would need to relocate their home. Many homeowners become displaced because they either cannot find somewhere to move their mobile home, or their home is too old to be relocated. Mobile home owners have increasingly limited options.

The number of mobile homes in Aurora has fluctuated over the last decade but has declined overall from 2,400 units in 2005 to 1,700 units in 2016. Fewer mobile home units combined with an increasing number of overall housing units in Aurora has reduced the share of mobile homes. Only 1.3 percent of the total housing stock in Aurora are mobile home units.

In 2016, the median value for mobile homes in Aurora was \$28,300—virtually the same as pre-recession years. Despite the recovery in mobile home values, the median value decreased by more than 100 percent after the housing market crashed in 2009, when the median mobile home value was just \$12,000. While this type of housing product may allow some households to become homeowners, mobile homes do not provide the same type of stability or equity as other for-sale homes.

Regardless of the uncertainty or lack of stability, there is still a high demand for this type of affordable homeownership in Aurora. At the time the Housing Market Study was drafted, there were four mobile homes listed for sale in Aurora for a median list price of \$53,150. Three of the four were brand new homes located in the Hillcrest Village community, starting at \$50,000. The fourth for-sale mobile home was built in 1966 and is listed at \$39,900—a 25 to 40 percent discount from new units. Although these prices appear affordable compared to a single-family home or attached home, the mortgage payment may only be a small portion of a household's monthly housing costs.

Lot rents for mobile home parks are often higher than mortgage payments, which can increase monthly costs substantially. The average lot fee for mobile home parks in Aurora is around \$600 per month. For a mobile home priced at \$53,150, the monthly payments would be around \$320¹. Without adding the fee for the lot, a household would need an income of only \$12,700 to afford this mortgage. Monthly costs increase to \$920—almost a 200 percent increase—when the average lot rent is incorporated into the mortgage payment.

¹ Monthly mortgage payments assume 10 percent down payment, February 2018 interest rate of 4.33%, \$75 in monthly utilities, and \$35 in annual property taxes.

MOBILE HOMES IN AURORA

To afford to purchase this mobile home and pay lot rent, a household would need to earn over \$36,700 annually. About two-thirds of Aurora residents would be able to afford the median price of a mobile home.

Alternatively, one of the new mobile homes for sale can be rented for \$1,349 a month. To afford this rent, a household would need to earn over \$50,000 annually. The median gross rent in Aurora is \$1,262, indicating that renting a mobile home is not an affordable alternative for households.

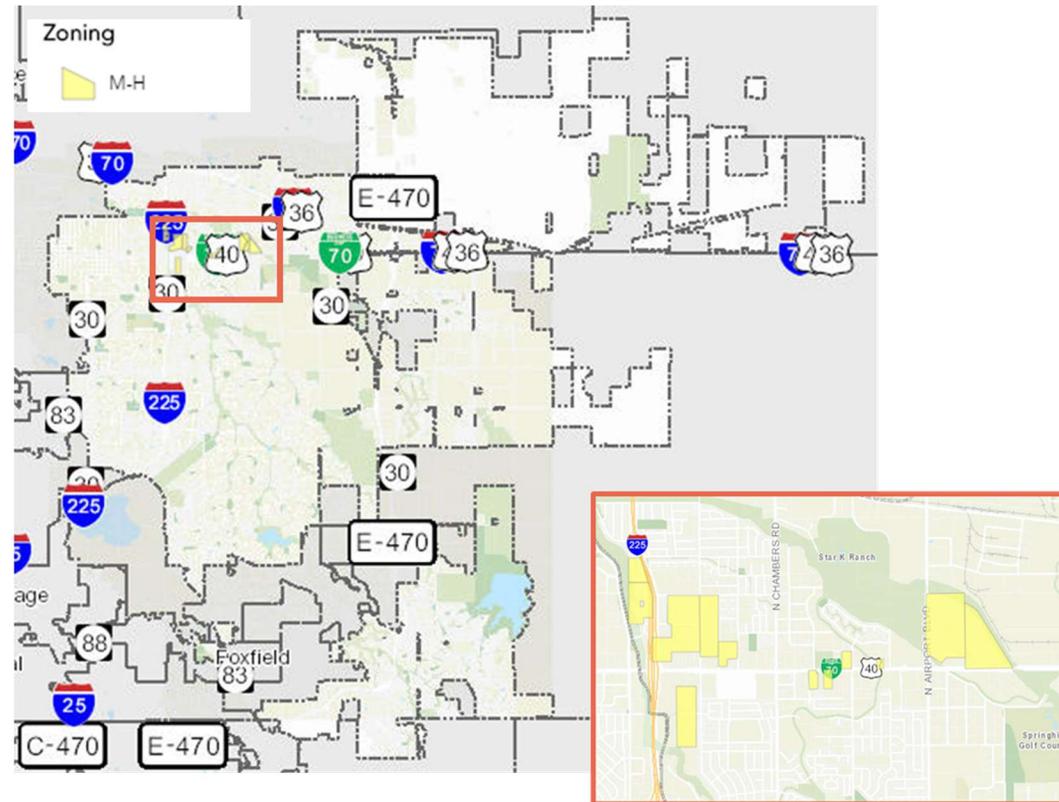
Although mobile homes have long been part of the market-rate affordable housing options, current prices and lot rents show that this type of housing is disappearing as a viable option for many low-income residents in Aurora.

ZONING

Mobile homes are permitted by right in just two zoning districts (M-H and P-MH). Note that manufactured housing is permitted in other residential zoning districts but only if on a permanent foundation.

Figure 4.
Existing M-H Zoning
in Aurora

Source:
Aurora Zoning maps at
auroraco.maps.arcgis.com



MOBILE HOMES IN AURORA

STATE-WIDE TRENDS

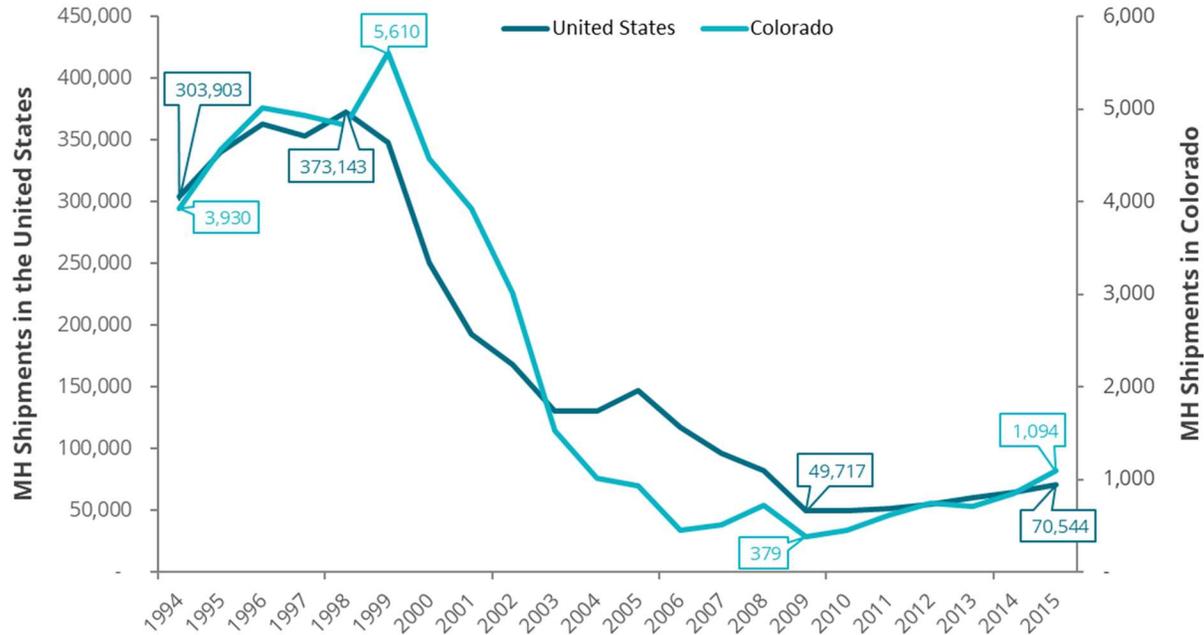
The redevelopment of mobile home parks—and subsequent displacement of residents—has become an issue of increasing importance over the last few years as land values and home prices throughout the front range present higher incentives for park owners to consider alternative uses. Estimates from 9to5 Colorado suggest that 40 percent of manufactured housing units could be lost from the affordable inventory due to redevelopment and outdated zoning/land use codes. A capstone report conducted in conjunction with the

Department of Local Affairs Division of Housing also notes the decline in manufactured homes across Colorado and highlights the concerns related to losing this resource in the context of declining affordability throughout the housing market.²

The following figure, adapted from that report, shows the national and statewide trends in manufactured housing deliveries.

Figure 5.
Annual Shipments of
Manufactured
Homes, 1994-2016

Source:
"Manufactured Home Parks in Colorado" and Root Policy Research.



² Holly G. Hamilton with the Department of Local Affairs, State of Colorado Division of Housing. Manufactured Home Parks in Colorado: Park Inventory Condition, Placement and Regulatory Analysis: One Perspective of Capacity

Building. URPL 6900 Capstone Project, University of Colorado College of Architecture and Planning. May 12 2016.

MOBILE HOMES IN AURORA

STATE REGULATION

In October 2018, the Colorado Department of Regulatory Agencies (DORA) conducted a Sunrise Review of Manufactured Housing Community Owners and Managers. The report found that “clearly harm is occurring in manufactured housing communities” after reviewing reports of retaliation, threats of eviction, discrimination/harassment, illegal water billing fees, trespassing/invasion of privacy, failure to repair and maintain property, rent and fee increases, non-consensual towing, and water quality issues.

The report also found much of the harm described stems from lack of enforcement of existing laws, exploitation of a relatively loose regulatory structure, and the inevitable tension between homeowners and landowners.

Manufactured housing communities are regulated by a patchwork of federal, state and local laws but there is no single agency dedicated to enforcement. The only recourse for homeowners who believe they are a victim of a Mobile Home Act violation is to pursue civil court action—an expensive and long undertaking.

RESIDENT PERSPECTIVES

As part of the Mobile Home Task Force process, residents shared their perspectives on living in and being displaced from mobile home parks in Aurora. Select stories and quotes—adapted from emails and videos—are included here to capture the spirit of the challenges facing mobile home residents across the city.

Manuel; an Aurora Mobile Home Park Resident

We have lived here for five or six years. Before it was normal. Now it's kind of crazy for us. Where are we going to go, you know? It's kind of stressful right now. They've increased our rent six times already since we moved here. For the last couple years, they increased I think four times- every six months- or something like that. They don't have no reasons, they just increase the rent. We don't even have maintenance. It's crazy. Where is the money? There's a lot of issues. When we got the house right here, we paid for the house. We were supposed to be here for a long time. I have a son at the school. My business is close to here, my work is close to here; that's the reason why we live here. So we talked to the lady, to the owner, and she said it's a long term renting. So after a couple of years, the situation it changed. They changed the rules, they changed everything. So now we don't know what is going to happen. It is a nice community because after the association, everything is nice. We know each other and have set rules. We give them money to have better things for the community. This is our house. The land- it's not us, so we have to move this place. So it's around five or six thousand dollars to move this place to somewhere else. We checked around all the parks in this area and there is no renting, no space. We don't know where we're going to go. I have a job and a little business but it's not enough. The owner of this land is going to have to figure out what we are going to do together. They live It is not just for her benefit. It's about families. I have relatives right here. They live close to here. Their mobile home is not that new. It's all they have. They're going to lose everything. It's a big concern for everybody in this park. What are we going to do? What about the families, the kids? I just want to ask for help because we feel alone right now. We don't have too much information about the rules, about the city, about the land, about our rights in this community and so we need that kind of help. That's all I ask.

MOBILE HOMES IN AURORA

**Luz Galicia,
Aurora Mobile Home
Park Resident**

“People think that you can just move mobile homes. That’s not true, it costs a lot of money. We are a safe community, we protect one another, we don’t even have to worry about locking our doors because we all look out for each other and for each other’s children. There is no crime here, we feel safe, a lot of us have family living in other homes in the same neighborhood. We know that if we had to leave, we would not have this protection anymore. We are many houses but we are all one family, it’s important for us to be together, we don’t want to be separated.”

“My house is not a house, it is my home. When your home, your family, your community is at risk of being ripped apart, there is no choice but to fight.... I’d be lost. I raised my kids here. This is home. This is all I have. Yes, it’s just a trailer to you or to them, but it’s home. I wish for a resolution.”

**Petra Bennett,
Aurora Mobile Home
Park Resident**

**9to5,
Draft Mobile Home
Toolkit**

“When parks close, the financial impact is incredibly significant for homeowners. In addition, low income families are more likely to depend on their community in the form of social capital. It is common to see multi-generational families living in the same park, creating a strong network of support that depends heavily on this close proximity. In effect, when parks close, many times residents are pushed further into poverty since vacancies in parks are scarce so the likelihood of several households all being able to move together is very small.”

“It’s calm and there’s always some kids playing outside. There’s no danger here. The kids play outside safe with their friends. The most frightening part about it if we get relocated and we try to look for somewhere else, we might be placed somewhere where it’s not safe outside.

**David Garcia,
Aurora Mobile Home
Park Child Resident**

MOBILE HOMES IN AURORA

Petra Bennett, Denver Meadows Resident

I moved into my home in October 2000 (or 2001). As a single mother of 3 boys with limited income and bad credit I did not qualify for any apartment in Aurora so I was very happy that I qualified to purchase the Mobile Home and was accepted into Denver Meadows. Our new home was at the front of the MHP and had no fences grass or plants. There were 3 large trees up front and one tree out back. Over the years of living at DMMHP I planted grass, fruit trees and bushes, flowers and build fences. I used hundreds of landscaping rocks and pavers to create a peaceful area that allowed you to feel as if you are in a rural area in the middle of a busy city. My home and lot was my piece of heaven and my sanctuary I took a lot of pride in my yard and home. I remodeled the inside of my home. Put in new subfloors, lament floor in the kitchen new carpet in my boy's rooms and wall treatments in most rooms of my home. Over the 17+ years of living in the park I invested thousands of dollars in my house and yard because in my heart it was mine. I know it may sound odd, but living in one place for 17+ years, you kind of take ownership of a property that belongs to someone else. The park owners and managers never spoke negatively of my yard (except when we started to fight against them over the rezoning and closure) and seemed pleased that I invested countless hours and money to make a once, stark place, a beautiful oasis. When the park manager used to cut grape vines of my fence and started to cut down trees (they started doing that in the past 3 years to bully me into leaving the park), I took it as they violated my property and often I spend days crying about this violation of my plants and yard. So many of my neighbors used to stop by my yard and complimented me on the beauty and calmness of it my pond in the back and front provided me peace and happiness for many years and losing my home caused me great pain for a long time.

**Guadalupe Mancera,
Aurora Mobile Home Park Resident**

“It is very difficult for the community and my family being in a situation where we are at risk of not having anywhere to live. “

“The cost to move our home] is in between fifteen thousand to twenty thousand, depending on the distance that it will travel to. I have looked but there is no space, let's say in a fifteen or twenty mile radius.

**Marco Adrian de la Torre,
Aurora Mobile Home Park Resident**

Nancy Flores, Denver Meadows Resident

I am the mother of four sons and a resident of the Denver Meadows community. I moved in exactly one month before the first rezoning hearing. When I bought the property, I paid cash and the woman omitted to tell me that she was thinking of selling the property. For this reason, I feel defrauded and I feel that I was denied my right to decide if I wanted to buy a home here knowing that they were going to sell. Because of this I am here fighting for my home. I am part of a magnificent, beautiful community. I give thanks to God for bringing me here so that I could join a community this wonderful that has hardworking neighbors and whole families and the truth is it's a beautiful community.

AURORA MHTF PROCESS

In the context of the above market realities, the Aurora Mobile Home Task Force began their work to understand the key issues facing homeowners and landowners in mobile home parks with the goal of providing recommendations to Aurora City Council on how to address those issues. Their work was organized into the following five phases.

PHASE I: INFORMATION & EDUCATION

This phase included presentations from city staff and consultants about Aurora demographics, the Aurora Comprehensive Plan, zoning code, economic development activities, housing services including Aurora Housing Authority programs, housing market trends and a background on affordable housing issues. The Task Force also heard from manufactured housing trade organizations and developers. Materials and presentations informing this phase included the following:

BBC RESEARCH & CONSULTING PRESENTATION “CITY OF AURORA STATE OF HOUSING” (AUGUST 2018).	<p>This presentation was prepared by Mollie Fitzpatrick, a Managing Director of BBC Research and Consulting in Denver that has prepared a variety of housing and fair housing analyses and studies for the City of Aurora. It outlines the state of housing in Aurora, including analysis of the housing market, types of housing available, resident (owner/renter) demographics, and affordability.</p> <p><i>Note: BBC Research & Consulting’s Housing and Community Development Team is now Root Policy Research</i></p>
CITY OF AURORA ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (JULY 2016).	<p>As a recipient of federal U.S. Department of Housing and Urban Development (HUD) funds, including Community Development Block Grant (CDBG), Home Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) funding, the City of Aurora is required to analyze the impediments to fair housing choice and then take steps to overcome the impediments it identifies. The AI contains an assessment of the housing status by protected class and private and public sector policies, procedures and practices that may act as Barriers to equal housing access.</p>
CITY OF AURORA UNIFIED DEVELOPMENT ORDINANCE, ZONING AND DEVELOPMENT STANDARDS FOR MOBILE/ MANUFACTURED HOMES DRAFT (OCTOBER 2018).	<p>As a recipient of federal U.S. Department of Housing and Urban Development (HUD) funds, including Community Development Block Grant (CDBG), Home Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) funding, the City of Aurora is required to analyze the impediments to fair housing choice and then take steps to overcome the impediments it identifies. The AI contains an assessment of the housing status by protected class and private and public sector policies, procedures and practices that may act as Barriers to equal housing access.</p>
MANUFACTURED HOUSING INSTITUTE AND ROCKY MOUNTAIN HOME ASSOCIATION PRESENTATION “MANUFACTURED HOUSING 101” (AUGUST 2018).	<p>This presentation was prepared by Rick Robinson, Senior Vice President of the Manufactured Housing Institute, and Tawny Peyton, Executive Director of the Rocky Mountain Home Association. The presentation materials include national, state, and City-level manufactured home statistics, a history of manufactured homes, the HUD code and snow loads, an update on terminology and models available, and some potential options for Aurora to consider in regard to affordable housing.</p>

AURORA MHTF PROCESS

PHASE II: IDENTIFY ISSUES & SOLUTIONS

Findings from Phase I as well as presentations of affordable housing survey results and urban renewal/redevelopment activities helped the Task Force identify key issues related to mobile homes and catalyzed the discussion around potential solutions. Materials and presentations informing this phase included the following:

CITY OF AURORA PUBLIC POLICY POLLING SURVEY RESULTS (AUGUST 2018).	The Public Policy Polling Survey Results captures the responses of 401 registered voters in Aurora to nine questions regarding affordable housing in Aurora.
AURORA URBAN RENEWAL AUTHORITY (AURA) MEMORANDUM “REQUEST FOR ADDITIONAL INFORMATION REGARDING AURA POLICIES” (SEPTEMBER 2018).	After City of Aurora staff members made a brief presentation regarding economic development programs at the August 13 Aurora Mobile Home Task Force meeting, Task Force members requested copies of the various policies that were discussed. This memorandum includes copies of these policies, including anti-displacement efforts as well as a resolution of the Board of Commissioners of the Aurora Urban Renewal Authority adopting a relocation assistance and land acquisition policy.
CITY OF BOULDER STUDY SESSION MEMORANDUM ON MOBILE AND MANUFACTURED HOMES (SEPTEMBER 2015).	The study session provides an overview of how mobile and manufactured homes currently help to meet the community’s housing needs and to get feedback from council on any actions the City should explore to preserve, protect, and potentially expand manufactured homes as a housing option in Boulder. It includes interest of the community, park residents, and park owners; the legal and regulatory landscape; key issues and potential responses; and next steps.
DENVER MEADOWS MOBILE HOME PARK STATISTICS FROM ADAMS COUNTY ASSESSOR’S OFFICE (NOVEMBER 2018).	This file contains the Denver Meadows mobile home park statistics that can be accessed from the Adams County Assessor’s Office. These statistics include the parcel number, owner, site address, designation and single or double wide, the year built, the appraised value, the assessed tax amount, and the property taxes for each site in the park.
HILLCREST VILLAGE MOBILE HOME PARK STATISTICS FROM ADAMS COUNTY ASSESSOR’S OFFICE (NOVEMBER 2018).	This file contains the Hillcrest Village mobile home park statistics that can be accessed from the Adams County Assessor’s Office. These statistics include the parcel number, owner, site address, designation and single or double wide, the year built, the appraised value, the assessed tax amount, and the property taxes for each site in the park.

AURORA MHTF PROCESS

PHASE III: BEST PRACTICES & RECOMMENDATIONS

The Aurora Mobile Home Task Force members reviewed a variety of local and general/national materials and best practices to gain expertise and to inform their process. They also invited local experts to present an overview of policy mechanisms to support manufactured housing. Materials and presentations informing this phase included the following:

9TO5 COLORADO'S PLATFORM FOR RIGHTS OF MOBILE HOMEOWNERS	9to5 Colorado is the state branch of a national organization that is dedicated to putting working women's issues on the public agenda. This platform was written to address the perceived lack of protections offered to mobile home residents by the Colorado Mobile Home Park Act. The platform outlines issues commonly encountered by mobile home residents and provides a solution for each issue.
KOMAL VAIDYA PRESENTATION "POLICY MECHANISMS TO SUPPORT MANUFACTURED HOUSING COMMUNITY RESIDENTS AT RISK OF DISPLACEMENT" (OCTOBER 2018).	This presentation and the associated document were prepared by Komal Vaidya, a community lawyer and law professor who has advocated on behalf of the mobile home park residents in Aurora. The materials include both recommendations that promote resident ownership as well as other recommendations that support manufactured housing residents (e.g., zoning changes, relocation, etc.).
CITY OF BOULDER MANUFACTURED HOUSING COMMUNITIES HANDBOOK FOR BOULDER HOMEOWNERS (MARCH 2018).	This handbook is intended for people who own their homes and who rent the land under them and reside in Boulder's manufactured housing communities/mobile home parks. The purpose of the handbook is to educate homeowners about their rights and responsibilities; explain the rights and responsibilities of community owners; ensure purchasers of manufactured homes are aware of possible issues before they sign a rental agreement; and to establish a comprehensive resource list for homeowners who need help resolving issues related to manufactured home living.
CITY OF BOULDER STRATEGIES FOR PROMOTING MOBILE HOME PARK INFRASTRUCTURE MAINTENANCE AND UPGRADES (AUGUST 2016).	The study was commissioned by Grounded Solutions Network, a national nonprofit organization that helps promote affordable housing solutions, and the City of Boulder. The purpose of the study is to identify some of the approaches taken by state or local jurisdictions or organizations throughout the nation to address infrastructure problems in mobile home parks, and to ensure the basic health and safety of residents and the longevity of the parks. The study identifies various approaches taken to address infrastructure problems at mobile home parks, their perceived benefits and lessons learned along the way; and identifies opportunities that jurisdictions could explore to regulate, incentivize, or otherwise enhance mobile home park infrastructure conditions.

AURORA MHTF PROCESS

CITY OF FORT COLLINS MOBILE HOME REDEVELOPMENT SERVICES PLAN (MARCH 2013).	This document defines a strategic policy direction for the City of Fort Collins to address resident, especially mobile home park resident, displacement due to redevelopment in the City. The report includes an overview of current City policies, an inventory and analysis of affordable housing stock, stabilization techniques, recommendations, and implementation actions.
TOWN OF DAVIE, FLORIDA AFFORDABLE HOUSING AND MOBILE HOME COMMUNITIES NEEDS ASSESSMENT, BEST PRACTICES, AND RECOMMENDATIONS.	This report outlines the efforts that of mobile home task force that was convened in in Davie, FL in 2007 in response to The Town of Davie Council’s declaration of an “affordable housing crisis”. The report includes a housing needs assessment, a best practices review, and recommendations.

PHASE IV: PRIORITIZATION OF RECOMMENDATIONS & IMPLEMENTATION OPTIONS

The Task Force focused on the development and prioritization of recommendations in December 2018 and January 2019. The Task Force took a consensus-oriented approach to developing and prioritizing the recommendations discussed in the next section of this report.

PHASE V: PRESENTATION OF RECOMMENDATIONS & COMPLETION OF REPORT

In fulfillment of its charge from City Council, the Task Force developed this report³ of findings and presented recommendations to the City of Aurora Housing Committee on January 23, 2019 and to the Aurora City Council on February 4, 2019.

³ Root Policy Research was contracted by the City of Aurora in December 2018 to assist the Aurora MHTF with report preparation.

MHTF KEY FINDINGS & RECOMMENDATIONS

This section discusses the key findings and recommendations of the mobile home Task force. It begins with a “things you should know” excerpt from 9to5’s draft mobile home toolkit.

Things You Should Know About Mobile Homes:

- ✓ Over 17.5 million Americans or about 6% of the total U.S. population live in manufactured housing.
- ✓ 41% of manufactured housing is affordable, compared to 23% of all housing types.
- ✓ Manufactured housing is the nation's largest source of unsubsidized affordable housing.
- ✓ However, the costs of displacement often mean financial precarity and destruction of social capital for those who live in mobile home communities:
- ✓ The cost of relocating a manufactured home can run between \$6,000-\$20,000, an amount equal to five to seven years’ worth of equity for many homeowners.
- ✓ From the 98,000 or so units across Colorado, almost 40,000 units are in threat of being lost to the market because of redevelopment and/or loss of zoning approval.
- ✓ 9to5 found that many manufactured home communities do not allow the installation of older units
- ✓ Mobile homes are especially important for immigrant and refugee populations, as well as seniors on fixed incomes. 40% of manufactured home owners are Latino in the Denver Metro Area.
- ✓ Most of these families’ wealth is invested in their home, so their home is likely their greatest asset
- ✓ It is common for existing mobile home parks to be marked of as “future development sites” instead of the vital housing sources they are.
- ✓ New parks are rarely built due to local ordinances that discourage the preservation or creation of parks. This means that this type of housing stock is incredibly competitive
- ✓ There are only 14 states that guarantee relocation assistance when mobile home parks close, and Colorado is not one of them.
- ✓ Even though 80% of manufactured home residents own their homes, they have a very insecure housing situation. Because residents are renting the land in which the home sits on they have little to no say when the owner(s) want to close or sell the park
- ✓ The term “mobile” is a complete misnomer; 99% of the time, these are not moved voluntarily once they are placed.
- ✓ Companies tend to charge based on distance and will often not be willing to move homes who are older meaning built usually before 1976, ultimately it will be up to a company if they want to do the move.
- ✓ The other challenge is that there are often no places at all to move a mobile home to within the metropolitan area as many parks may not have spaces open or allow older homes.



MHTF KEY FINDINGS & RECOMMENDATIONS

CRITICAL NEEDS

The Task Force identified the following concerns as the most critical needs to be addressed:

- **Affordability.** Mobile homes are an important part of the affordable housing continuum in Aurora. Rising housing costs Citywide emphasize the need to preserve affordability of existing housing stock—including mobile home parks—across the City. Some estimates indicate that 40 percent of the mobile homes statewide could disappear in the next 10 years if municipalities don't take action to protect parks.
- **Complexity.** There is a lack of awareness of the complexities and issues associated with mobile home parks among City staff, elected officials, and the general public. In addition, there is no state department that enforces the Mobile Home Park Act.
- **Rights and responsibilities.** There is a lack of awareness among mobile home park occupants of their rights and responsibilities related to mobile home ownership, taxation, code inspection, and other issues.
- **Vulnerability and displacement.** Mobile home park occupants face unique vulnerabilities because they own their home but not the land underneath. Barriers to moving mobile homes exacerbate the vulnerability of occupants—moving mobile homes to new sites is often cost prohibitive and/or a violation of code (for pre-1976 homes), or effectively impossible due to park rules (many won't accept homes built before 2000) or limited availability.

MHTF KEY FINDINGS & RECOMMENDATIONS

AURORA MHTF RECOMMENDATIONS

The Aurora Mobile Home Task Force identified the following recommendations for the Aurora City Council’s consideration. The recommendations are organized around five key goals.

Goal I: Educate elected officials, city staff, and mobile home residents and owners on mobile home park topics.

Goal I Recommendations:

1. Create a permanent mobile home task force.

Considerations and Issues:

- Lead educational efforts
- Track disparate impact
- Research solutions
- Present to City Council every quarter

2. Provide educational materials and opportunities for City officials, code enforcement staff, and mobile home park owners to raise awareness of mobile home park issues, rights, and responsibilities.

Considerations and Issues:

- Send City staff to attend the “I’M HOME Conference” by Prosperity Now
- Provide background information that addresses the realities of living in and owning a mobile home park.
- Identify mobile homes within the housing landscape as an affordable housing option and incorporate into the city’s long-term housing plan.
- Provide information on housing code compliance, lack of mortgage options and inability to move mobile homes built before 1976.

3. Provide educational materials and opportunities for mobile home residents and future residents to raise awareness of mobile home park issues, risks, rights, and responsibilities.

Considerations and Issues:

- Create a mobile home park guide for homeowners with information on the Colorado Mobile Home Park Act and basic “Know Your Rights” information.
- Provide information regarding code inspections and rights and responsibilities of mobile home park residents in the inspection process
- Provide information regarding tax liens and responsibility
 - o Recommend increasing tax sale timeline on mobile homes from one year to three years, like other residential properties.
 - o Need for certified tax notification of residents to avoid unsuspected liens and sale of mobile homes in a tax sale.
- Provide trainings on how to form neighborhood associations and homeowners’ associations (HOAs)

MHTF KEY FINDINGS & RECOMMENDATIONS

Goal II: Create City polices and define best practices that support and protect mobile home parks and mobile home residents within the City of Aurora.

Goal II Recommendations:

1. The City should create stronger protections for residents experiencing retaliation from landlords/mobile home park owners.
2. The City should require that there is mandatory mediation when a mobile home resident is facing eviction/displacement with an understanding that the eviction process and the consequences thereof are more severe for mobile home owners than traditional renters due to equity in the home itself.
3. The City should support state legislation that would promote housing affordability—including overturning the ban on rent control—and legislation to address mobile home issues, including the repayment of equity in the case of displacement.
4. The City should draft and encourage the use of model leases that lay out mobile home tenant/landlord responsibilities.
5. The City should mandate that mobile home residents and owners have access to posted, written rights.
6. Further define roles and responsibilities of mobile home park owners and residents (e.g., trees, landscaping, parking, utilities, other infrastructure, etc.).
7. Address the sale of mobile homes and stipulate that landowners cannot force homeowners to move to a different home if their home is old, for sale, etc. In cases where a move is necessary, landowners should compensate homeowners for lost equity.

Goal III: Support the preservation of existing mobile home parks and the acquisition of additional mobile home park land.

Goal III Recommendations:

1. Complete a thorough assessment of existing mobile home park owners.
2. Create funding source to support community land trust and/or resident cooperative ownership. This may include county, state and foundations as well.

Considerations and Issues:

- Who owns the parks?
- How much is rent?
- What are the intentions of park owners (e.g. plans to sell, close, etc.)?
- How many residents rent vs own?

MHTF KEY FINDINGS & RECOMMENDATIONS

3. Provide mobile home park residents with a collective purchase opportunity before it is offered to a broader market and require notification of all park residents when a park is listed for sale. Sale price should be based on independent assessment of value.
4. Incentivize mobile home park owners with infrastructure improvements to existing parks. (For example, the City of Fort Collins will help pay for infrastructure improvements if a park owner agrees to keep the park open for 10 years or more).

Goal IV: Revise land use regulations and zoning code to include more options for mobile home parks and protections for mobile home park residents.

Goal IV Recommendations:

1. The City should extend the moratorium another 10 months to provide more time for the Council to consider recommendations and to decide how best to move forward.
2. The City should mandate that all residents who are directly impacted by rezoning should be notified individually and provided with clear information about the implications of this rezoning at least three months prior to rezoning, in accordance with other zoning applications.
3. Prioritize the development of new mobile home parks with a community ownership model and zone vacant land to accommodate mobile home park development by right (Note there are no vacant parcels zoned for manufactured homes without a permanent foundation in Aurora currently).
4. Review the current rezoning process and consider options to discourage rezoning mobile home parks (see City of Boulder for model).

Goal V: Formalize relocation and displacement policies.

Goal V Recommendations:

1. Require land owners to develop a relocation plan and provide relocation assistance for displaced residents (For example, the City of Eugene, OR requires land owners to provide \$11,700 in relocation assistance for residents in a single-wide mobile home and \$17,000 for those in a double).
2. Develop a local preference policy that gives priority to displaced residents for new units/lots within the same neighborhood or ZIP code if applicable.