

Greauxing Resilience at Home

City of Boulder, Colorado: Affordable Housing, Manufactured Housing, and Environmental Plans and Initiatives



GEORGETOWN CLIMATE CENTER

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ABOUT THIS REPORT

Louisiana is one of the hardest-hit areas in the United States as extreme weather events and regular flooding become more frequent and intense.¹ These challenges often fall “first and worst” on Black, Indigenous, and People of Color or “BIPOC” and low-income communities.² This is especially true in the U.S. Gulf Coast region and the state of Louisiana.

Over time, these challenges are being exacerbated by population increases and transitions as climate and non-climate drivers (e.g., people moving out of urban centers into more rural areas) influence where people choose — or are able — to live.

In southeast Louisiana, resilient, affordable housing initiatives are critical to ensuring equitable adaptation that takes into consideration the myriad overlapping challenges facing all Louisianans, but especially those living in communities that have long borne a disproportionate burden of risk.

Over a two-year period between fall 2020 and spring 2022, **Capital Region Planning Commission** and **Georgetown Climate Center** partnered with dozens of people from government, private, and nonprofit sectors and community stakeholders in Region Seven of the **Louisiana Watershed Initiative**.³ The result of that partnership effort is **Greauxing Resilience at Home: A Regional Vision**⁴ (Regional Vision), a resource to inform Region Seven’s ongoing work to increase community resilience by promoting affordable housing and nature-based solutions.

Regional and local governments in Region Seven can use the Regional Vision to identify potential legal, planning, and policy tools and projects to increase the affordability and availability of housing and the use of nature-based solutions. In addition, the Regional Vision offers insights for policymakers across Louisiana, throughout the Gulf Coast region, and nationally.

This report is composed of 24 individual case studies developed by Georgetown Climate Center to support the Regional Vision. These case studies describe best and emerging practices, tools, and examples from Louisiana and other U.S. jurisdictions to make progress on these complex and challenging issues. These case studies are intended to provide transferable lessons and ideas for regional and local governments addressing housing and mitigating flood risk as integrated parts of comprehensive community resilience strategies. Collectively, these case studies present a suite, although not an exhaustive list of tools and approaches that can be used to facilitate any of these efforts.

1 STATE OF LA., LOUISIANA CLIMATE ACTION PLAN: CLIMATE INITIATIVES TASK FORCE RECOMMENDATIONS TO THE GOVERNOR 15–16 (Feb. 2022), available at <https://gov.louisiana.gov/assets/docs/CCI-Task-force/CAP/ClimateActionPlanFinal.pdf>.

2 See *id.* at 15–17.

3 The Louisiana Watershed Initiative is an effort to create a paradigm shift in floodplain management towards a strategy that approaches flood risk reduction from a nature-based solutions and land-use-based approach. A part of this approach includes identifying eight separate regional watershed management areas to assist in achieving cross-jurisdictional activities.

Region Seven is one of these eight watershed regions. Region Seven encompasses the upper part of the toe of Louisiana’s boot. It spans eastward from the Mississippi River near Baton Rouge across the Northshore (i.e., north of Lakes Pontchartrain and Maurepas) to Mississippi and along the Mississippi River to the Bonnet Carré Spillway. The region includes 13 parishes and 45 incorporated municipalities.

4 To reflect their connection to Louisiana’s cultural heritage, the project team and members of Region Seven that participated in this process chose to use the word “Greaux,” a French-inspired phonetic spelling of the word “Grow,” to brand this product.

Where possible, all the case studies share a consistent organizational format to allow easier cross-comparison of tools, processes, and takeaways:

- The **Background** section introduces the regional and local context (e.g., location, demographics) for each case study, including the following facing each jurisdiction: extreme weather risks, housing and environmental challenges, and development pressures.
- The **Housing** section focuses on the legal, planning, and policy tools and projects that have been designed and implemented to support the growth and preservation of housing affordability and availability.
- The **Environment** section highlights how vulnerable habitats like floodplains and other open spaces are being restored, conserved, and protected as a part of comprehensive resilience strategies to provide important ecosystem and community benefits like reducing flood risk and creating community assets, such as parks and trails.
- The **Community Engagement** section summarizes how governments have provided different types of public engagement opportunities and how affected residents have contributed to these planning and decisionmaking processes.
- The **Funding** section identifies how the programs, plans, and projects discussed have been funded by federal, state, and local government and private and nongovernmental sources.
- The **Next Steps** section captures the anticipated future actions that featured case study jurisdictions may take in implementing these tools and strategies.
- The **Considerations and Lessons Learned** section concludes with the primary takeaways from each example that other regional and local policymakers and communities may consider when developing or implementing their own housing and resilience strategies using these legal, planning, and policy tools.

A few additional notes about the case studies:

- **The case studies selected prioritize relatable and scalable models from places similar to Louisiana:** Wherever possible, Georgetown Climate Center aimed to acknowledge and lift up the work of jurisdictions and nongovernmental actors in Region Seven and neighboring watershed regions to inspire peer-to-peer sharing and actions from as close to home as possible. These resources are drawn from 12 states, with an emphasis on regions and local areas in the Gulf and Mid-Atlantic: Colorado, Florida, Georgia, Illinois, Iowa, Louisiana, New York, North Carolina, Oregon, South Carolina, Texas, and Virginia. Examples and lessons drawn from these regions are easiest to apply to a Louisianan context because they feature similar geography or analogous impacts from flooding and other climate effects.
- **There are no perfect, “one-size-fits-all” solutions:** While the case studies and resource entries informing the Region Vision are instructive for Region Seven and beyond, none of them are “perfect” examples of how to solve these complex and challenging issues. Georgetown Climate Center found no single case study or resource that provides a point-for-point or model for what Region Seven is trying to accomplish. No other jurisdiction identified is currently trying to integrate housing, flooding, equity, resilience, and population changes together in a single plan, ordinance, or policy. However, some jurisdictions are moving in that direction, or are making progress on discrete elements of what will eventually become a more holistic strategy. Therefore, this report and the Regional Vision draw analogous connections and recommendations that can be combined to facilitate more comprehensive planning and land-use efforts.

The case studies in this report were informed by interviews with practitioners and community leaders in charge of designing and overseeing this work. No statements or opinions, however, should be attributed to any individual or organization included in the *Acknowledgements* section of this report.

It is also important to note that the examples described in each case study are ongoing and the content included in this report is current as of spring 2022. For future updates about these and other case studies and the Regional Vision, please visit [Greaxing Resilience at Home: A Regional Vision](#) and Georgetown Climate Center’s [Adaptation Clearinghouse](#).

City of Boulder, Colorado

Affordable Housing, Manufactured Housing, and Environmental Plans and Initiatives

EXECUTIVE SUMMARY

The City of Boulder, Colorado is experiencing the joint pressures of rapid regional population growth and climate change — challenges which are not unique to this city alone. Boulder has addressed these challenges in the Boulder Valley Comprehensive Plan, a plan jointly adopted by the City and County of Boulder to direct decisions on land use, natural and built environments, and climate. The Boulder Valley Comprehensive Plan is a strong example of a planning document that places an emphasis on housing and the environment. More specifically, this plan is notable for the following reasons:

Developing affordable housing goals and plans for multiple income levels including low-income, moderate-income, and middle-income households to ensure housing security for Boulder's residents.

Developing specific and actionable master plans, such as the Boulder Manufactured Housing Strategy and Action Plan, to address the nuances of the policies highlighted in the Boulder Valley Comprehensive Plan.

Developing policies to identify and preserve the rural-urban divide between the City of Boulder and surrounding areas by creating opportunities for sustainable population growth without threatening the rural character and valuable ecosystems of the Boulder Valley.

The Boulder Valley Comprehensive Plan and associated master plans and strategies can serve as examples for other local and regional policymakers seeking to tackle the compounding challenges of population growth, affordable housing, and resilience.

BACKGROUND

The city of Boulder, Colorado is located in Boulder County, northwest of Denver and at the foothills of the Rocky Mountains. In 2019, the estimated population of Boulder was over 105,000 people, 80 percent of which were white, while Hispanics or Latinos made up roughly 10 percent

of the population.¹ In 2019, the median household income was \$69,520, and over 20 percent of the population was living in poverty.² Between 2015 and 2019, the median gross rent totaled \$1,554.³

OVERVIEW OF THE BOULDER VALLEY COMPREHENSIVE PLAN, THE MANUFACTURED HOUSING STRATEGY AND ACTION PLAN, AND OTHER RELEVANT PLANS

In 1977, the City of Boulder and Boulder County jointly adopted the first Boulder Valley Comprehensive Plan “to protect the natural environment of the Boulder Valley while fostering a livable, vibrant and sustainable community,” addressing urban development and the preservation of the rural character of the valley.⁴ The core values of this plan include sustainability, diversity, compact and infill development, open space preservation, economic activity, all-mode transportation, and housing diversity.⁵ In the plan, the city and county make specific commitments to support community housing needs in terms of affordable and manufactured housing, while employing sustainability as a unifying framework to meet environmental, social, and economic goals.⁶ Unless otherwise specified, the City of Boulder will be referenced as the primary actor in this report, however acknowledging the role that Boulder County plays in the Boulder Valley Comprehensive Plan.

Based on the Boulder Valley Comprehensive Plan Policy 7.08: *Preservation and Development of Manufactured Housing*, the City of Boulder established the Manufactured Housing Strategy and 2019–2021 Action Plan.⁷ This policy encourages the city to preserve and expand Manufactured Housing Communities in Boulder and resident ownership of those communities, and tackle health and safety issues, while minimizing resident displacement.⁸

¹ QuickFacts: Boulder City, Colorado, U.S. CENSUS BUREAU, <https://www.census.gov/quickfacts/bouldercitycolorado> (last visited Jan. 4, 2022).

² *Id.*

³ *Id.*

⁴ CITY OF BOULDER & BOULDER COUNTY, BOULDER VALLEY COMPREHENSIVE PLAN: 2020 MID-TERM UPDATE 4 (2021), available at <https://bouldercolorado.gov/media/3350/download?inline>.

⁵ *Id.* at 2.

⁶ *Id.* at 10, 82

⁷ *Manufactured Housing Strategy*, CITY OF BOULDER, COLO., <https://bouldercolorado.gov/projects/manufactured-housing-strategy> (last visited Jan. 4, 2022). Note, in Boulder’s comprehensive plan, this policy is listed at 7.09.

⁸ CITY OF BOULDER, COLO., MANUFACTURED HOUSING STRATEGY & 2019–2021 ACTION PLAN 1 (2019), available at <https://bouldercolorado.gov/sites/default/files/2021-05/manufacturedhousingstrategyandactionplan.pdf>.

Additionally, Boulder City Council adopted the city's first Racial Equity Plan in 2021. This plan was developed as a "living road map that will guide the City of Boulder government through the process of prioritizing goals, specifying details, and assigning resources to achieve meaningful change."⁹ This plan is especially notable as it references the Boulder Valley Comprehensive Plan, striving to integrate the two plans to foster inclusive and diverse communities, housing, transportation, and public space policies that serve underserved communities, and general sustainability.¹⁰

Beyond equity, Boulder is also integrating resilience into its local actions. In 2016, the city released the City of Boulder Resilience Strategy. This strategy provides an overview of current and future initiatives and strategies to cultivate resilience in the face of a changing climate, economy, and society.¹¹ Among its recommendations, the strategy presents Boulder's City Resilience Framework.¹²

The Resilience Strategy is mentioned and cross-referenced in both the Boulder Valley Comprehensive Plan and the Racial Equity Plan. For instance, the Boulder Valley Comprehensive Plan highlights the need to use the Resilience Framework to support a broad spectrum of human needs, as well as support overarching sustainability goals.¹³

The content below goes into more depth about some of the affordable housing, manufactured housing, and environmental priorities in the comprehensive plan and related initiatives.

HOUSING

Planning

In Boulder, housing is considered baseline affordable when housing costs are less than 30 percent of a household's total income — both for home rentals and ownership.¹⁴ Affordable housing in Boulder is further broken down into three income categories; low-, moderate-, and middle-incomes relative to the Area Median Income (AMI) (\$102,300 in 2019).¹⁵

⁹ *Racial Equity*, CITY OF BOULDER, COLO., <https://bouldercolorado.gov/services/racial-equity> (last visited Jan. 4, 2022).

¹⁰ CITY OF BOULDER, COLO., RACIAL EQUITY PLAN 8 (2021), *available at* <https://bouldercolorado.gov/media/4167/download?inline>.

¹¹ CITY OF BOULDER, COLO., CITY OF BOULDER RESILIENCE STRATEGY 2 (2016).

¹² *Id.* at 24.

¹³ CITY OF BOULDER & BOULDER COUNTY, COLO., BOULDER VALLEY COMPREHENSIVE PLAN: 2020 MID-TERM UPDATE 9, 88 (2021), *available at* <https://bouldercolorado.gov/media/3350/download?inline>.

¹⁴ *Affordable Housing in Boulder*, CITY OF BOULDER, COLO., <https://bouldercolorado.gov/guide/affordable-housing-boulder> (last visited Jan. 4, 2022).

¹⁵ *Id.*

Income Bracket	Percentage Area Median Income	Income Range for Three-Person Household
Low Income	0–60% AMI	\$0– \$61,380
Moderate Income	61–79% AMI	\$62,000–\$81,000
Middle Income	80–120% AMI	\$82,000–\$123,000

As of 2020, there were 3,767 affordable housing units, constituting 8.4 percent of the city’s total housing stock.¹⁶

The Boulder Valley Comprehensive Plan cites community housing trends, such as rising property values, an aging population, diminished diversity of housing types and price ranges, and anticipated student growth at the University of Colorado.¹⁷ To address these trends, the city outlines priority housing policies for the city and the county in the plan under the themes of Supporting Community Housing Needs; Preserving and Enhancing Housing Choices; and Integrating Growth and Community Housing Goals.¹⁸

As recommended in the Boulder Valley Comprehensive Plan, the city revised its local affordable housing regulations in 2020 to increase the total proportion of permanently affordable housing units among low- to middle-income households from 10 to 15 percent.^{19,20} Of that 15 percent, 1,000 units will be for middle-income households.²¹ This goal aligns with the City of Boulder’s Middle Income Housing Strategy for 2016–2030. The primary goal of this strategy is to build or preserve 3,500 middle-income homes by 2030; 2,500 of which will be market-rate middle-income, and 1,000 of which will be deed restricted, permanently affordable.²² This strategy and commitment demonstrates the city’s aim to ensure adequate housing diversity and supply for residents of all income brackets.

¹⁶ *Id.*

¹⁷ CITY OF BOULDER & BOULDER COUNTY, COLO., BOULDER VALLEY COMPREHENSIVE PLAN: 2020 MID-TERM UPDATE (2021), available at <https://bouldercolorado.gov/media/3350/download?inline>.

¹⁸ *Id.* at 81.

¹⁹ *Affordable Housing in Boulder*, CITY OF BOULDER, COLO., <https://bouldercolorado.gov/guide/affordable-housing-boulder> (last visited Jan. 4, 2022).

²⁰ *Id.*

²¹ *Id.*

²² CITY OF BOULDER, COLO., MIDDLE INCOME HOUSING STRATEGY 3 (2016), available at <https://bouldercolorado.gov/media/5758/download?inline>.

The city has also created an interactive Affordable Housing Dashboard to track the city’s progress towards reaching the goal of 15 percent affordable housing, as well as additional metrics on affordable housing type, location, and resident demographics.²³ The creation of this tool signals Boulder’s commitment to internal coordination and external transparency as the city works towards its affordable housing goals.

Regional Planning and Coordination

Boulder is a member of the Boulder County Regional Housing Partnership, a cross-jurisdictional working group formed in 2016 to address housing affordability and development needs in Boulder County.²⁴ Through this effort, the partners developed a regional strategy that helped to establish the organization Home Wanted, and included goals of securing a total of 18,000 affordable housing units — 12 percent of total housing units — within the county by 2035.²⁵ Home Wanted is a collaboration of nine jurisdictions in Boulder County, Colorado and aims to use community expertise to co-create strategies and policies and secure adequate funding for safe, affordable housing for low- and middle- income residents.²⁶

Manufactured Housing Communities

Manufactured Housing Communities (MHC) — often referred to as “Mobile Home Parks” or “Trailer Parks” — are communities of five or more factory-built housing units that are constructed according to the federal manufactured home construction safety standards.²⁷ Manufactured homes are one of the largest unsubsidized forms of affordable housing in America.²⁸

Within the city of Boulder, there are five MHC, which encompass over 1,300 households.²⁹ The majority of manufactured homes in Boulder are owner-occupied and have an annual household income of less than \$40,000.³⁰ MHC also have a higher proportion of residents with children under the age of 18 or residents over the age of 60, those who collect Social Security income, and/or are

²³ *Affordable Housing in the City of Boulder*, CITY OF BOULDER, COLO., <https://bouldercolorado.gov/boulder-measures/affordable-housing-boulder> (last visited Jan. 4, 2022).

²⁴ *About Home Wanted*, HOME WANTED, <https://homewanted.org/about/> (last visited Jan. 4, 2022).

²⁵ *Regional Housing Plan*, HOME WANTED, <https://homewanted.org/issue/plan-goals/> (last visited Jan. 4, 2022).

²⁶ *About Home Wanted*, HOME WANTED, <https://homewanted.org/about/> (last visited Jan. 4, 2022).

²⁷ CITY OF BOULDER, COLO., MANUFACTURED HOUSING COMMUNITIES HANDBOOK FOR BOULDER HOMEOWNERS (2018).

²⁸ Lesli Gooch, *Manufactured housing: Elevating housing innovation and expanding attainable homeownership*, THE NAT’L HOUS. CONFERENCE (Oct. 4, 2020), <https://nhc.org/manufactured-housing-elevating-housing-innovation-and-expanding-attainable-homeownership/>.

²⁹ *Manufactured Housing Strategy*, CITY OF BOULDER, COLO., <https://bouldercolorado.gov/projects/manufactured-housing-strategy> (last visited Jan. 4, 2022).

³⁰ CITY OF BOULDER, COLO., MANUFACTURED HOUSING STRATEGY AND 2019–2021 ACTION PLAN 6 (2019), available at <https://bouldercolorado.gov/sites/default/files/2021-05/manufacturedhousingstrategyandactionplan.pdf>.

Latinx, as compared to Boulder at large.³¹ As overall housing prices and property values increase in Boulder, the affordable nature of these communities for low- to moderate-income residents may be jeopardized by rising pad rent costs.

MHC are especially vulnerable to natural disasters and the impacts of climate change. Many MHC were developed in response to rapid population growth and housing shortages. This, combined with historic discrimination and zoning inequities, has led many MHC to be disproportionately located in “less desirable” areas that are more vulnerable to disasters events, such as flooding, hurricanes, and tornadoes.³² In the Boulder area, flooding and other disasters have impacted MHC considerably. In 2013, for example, a flooding event destroyed over 270 manufactured homes in Colorado.³³

In 2019, the City of Boulder adopted the Manufactured Housing Strategy and 2019–2021 Action Plan, which include four guiding principles for decisionmaking — Accountability, Affordability, Community, and Viability³⁴ — and a prioritized list of actions that align with Policy 7.08 in the Boulder Valley Comprehensive Plan:

Encouraging preservation of existing MHC.

Encouraging development of new MHC.

Increasing opportunities for Resident Owned Communities (ROC).

Reducing or eliminating health and safety issues.

Rehousing displaced households.

This is an example of strong city planning tailored to the needs of MHC.

The 2019–2021 Action Plan details action items within the categories of infrastructure, pad rent stabilization, local enforcement, energy efficiency, and land use.³⁵ Proposed infrastructure actions include the creation of local water and sewer performance standards, a survey of code constraints limiting infrastructure replacement, utility bill notice requirements, and requirements for MHC owners to develop infrastructure plans and to pay for lodging costs during prolonged service disruption.³⁶

³¹ *Id.*

³² Crystal Launder, *Preserving Manufactured Home Communities*, AMERICAN PLANNING ASS’N PLANNING ADVISORY SERV. (Oct./Nov. 2020), available at https://mhccv.org/wp-content/uploads/2020/10/pas-memo-2020-09-10rev_a.pdf.

³³ *Id.* at 3.

³⁴ CITY OF BOULDER, COLO., MANUFACTURED HOUSING STRATEGY AND 2019–2021 ACTION PLAN 2 (2019), available at <https://bouldercolorado.gov/sites/default/files/2021-05/manufacturedhousingstrategyandactionplan.pdf>.

³⁵ *Id.* at 22–24.

³⁶ *Id.* at 22.

Pad rent stabilization actions include exploring legal pathways for enforcing this pad rent stabilization and potential voluntary pad rent agreement. The plan acknowledges that because of the state’s statute banning rent control,³⁷ Mapleton is the only community that is legally able to enforce rent stabilization as they are owned by Thistle Communities, an affordable housing nonprofit and Community Housing Development Organization.³⁸

Local enforcement actions encourage the development and distribution of a “Resident Navigation Guide” and other resources, while also analyzing staffing needs to effectively serve MHC-related workloads and new MHC ordinances.³⁹ Energy efficiency actions explore partnerships to create zero energy modular homes, to expand the Ponderosa solar garden pilot to other MHC, and to explore Energy Impact Offset Fund investments to benefit manufactured home owners.⁴⁰ The city suggests a land use analysis could identify any feasible locations for new MHC.⁴¹

This housing strategy and action plan are important to address the unique challenges faced by MHC. As the time period for the plan ends in 2021, the city intends to evaluate its results and effectiveness. The city will consider future action items identified in the Action Plan, which include forming partnerships to replace utility systems, developing pad rent stabilization ordinances, applying racial equity tools and principles to planning efforts, and updating the city’s Mobile Home overlay zone.⁴²

Preserving Affordable Housing Options: City-Owned Manufactured Housing Communities

While rare, Boulder purchased two MHC as a way to address failing infrastructure and safety issues. In these instances, the city did not intend to become the permanent owner of the MHC, but instead used city resources to preserve and improve the parks before eventually selling or transferring the parks to new, long-term owners, specifically affordable housing nonprofits or housing authorities.

Ponderosa Community

Following damage to the Ponderosa Mobile Home Park sewer and water infrastructure from a 2013 flood, Boulder purchased the park in 2017, using funds from the U.S. Department of Housing and Urban Development’s Community Development Block Grant program for Disaster Recovery. In doing so, the city signed Resolution No. 1217 to

³⁷ COLO. REV. STAT. § 38-12-301 (2021).

³⁸ CITY OF BOULDER, COLO., MANUFACTURED HOUSING STRATEGY AND 2019–2021 ACTION PLAN 12 (2019), available at <https://boulder.colorado.gov/sites/default/files/2021-05/manufacturedhousingstrategyandactionplan.pdf>.

³⁹ *Id.* at 22–23.

⁴⁰ *Id.* at 23.

⁴¹ *Id.*

⁴² *Id.* at 25.

protect resident health and safety, “enable permanent affordability, promote sustainability and resiliency, and ensure minimal resident displacement.”⁴³ This resolution launched the Ponderosa Community Stabilization Project with the goals of having the land eventually owned by a nonprofit housing provider, offering residents the option to move from existing mobile homes to new, permanently affordable, fixed-foundation, energy-efficient homes, and creating park amenities, such as gardens, play areas, green spaces, and a community house with a resilience center.⁴⁴

Infrastructure improvements include replacing sewer, water, electric and gas infrastructure, paving roads, increasing the number of fire hydrants, introducing storm sewers and stormwater detention ponds, increasing green spaces and the tree canopy, and moving the main community access out of conveyance and high hazard flood zones. Infrastructure construction began in 2020.⁴⁵

Since 2015, the city has been undertaking extensive community engagement efforts to support these projects, working with community residents, the park owner, city staff, and council members to develop the Goals and Drivers for the Ponderosa Community Stabilization Project.⁴⁶

Mapleton Mobile Home Park

In 1996, Boulder purchased the Mapleton Mobile Home Park with funding from the Stormwater and Flood Control Utility Fund.⁴⁷ The goal of this park purchase was to improve infrastructure and safety for the community without jeopardizing the future of the park. Specifically, the city aimed to facilitate planned flood improvements to Goose Creek, resident ownership of the park, and permanent affordability for 120 out of the total 135 home sites.⁴⁸

In 2004, Mapleton was sold to Thistle Communities, a nonprofit housing organization, which leases the land to the resident nonprofit Mapleton Home Association (MHA). The MHA governs the park community and contracts property management to a third-party company. Since the initial purchase of Mapleton, infrastructure replacement and flood prevention have been ongoing.⁴⁹

⁴³ City of Boulder, Colo., Resolution 1217: A Resolution for the Purpose of Ensuring the Long-Term Sustainability, Resilience and Permanent Affordability of the Ponderosa Mobile Home Park (Oct. 17, 2017).

⁴⁴ *Ponderosa Community Stabilization Project*, CITY OF BOULDER, COLO., <https://bouldercolorado.gov/projects/ponderosa-community-stabilization-project> (last visited Jan. 4, 2022).

⁴⁵ *Id.*

⁴⁶ CITY OF BOULDER, COLO., MANUFACTURED HOUSING STRATEGY AND 2019–2021 ACTION PLAN 16 (2019), available at <https://bouldercolorado.gov/sites/default/files/2021-05/manufacturedhousingstrategyandactionplan.pdf>.

⁴⁷ *Id.* at 14.

⁴⁸ *Id.*

⁴⁹ *Id.*

Anti-Displacement

Additionally, the 2015 update to the Boulder Valley Comprehensive Plan seeks to address climate-related challenges and incorporates policies that foster community resilience. For example, newer policies are proposed to “improve community capacity and self-reliance, address preparedness, response, and recovery to disruptions such as floods, fires, or economic downturns, and improve community connectivity and communication about such disruptions,” while also reducing Boulder’s contributions to climate change.⁵⁰

The comprehensive plan highlights the need to minimize resident displacement in Policy 7.16 by evaluating existing policies and regulations and continuing to offer relocation assistance to displaced, low-income households.⁵¹ As the effects of climate change worsen, coupled with rising housing prices, it is likely that more residents will face displacement pressures, and preparation for these scenarios is necessary to mitigate the incidence of displacement while creating the opportunity for relocation when necessary.

The comprehensive plan also addresses economic displacement of businesses and customers in Section 5 on the Economy, highlighting strategies to reduce this type of displacement as the community is revitalized.⁵² These strategies include “area planning with community input, infrastructure improvements, shared parking strategies, transit options and hubs and changes to zoning or development standards and incentives (e.g., financial incentives, development potential or urban renewal authority).”⁵³

ENVIRONMENT

Section 3 of the Boulder Valley Comprehensive Plan is dedicated to the natural environment, including both urban and rural areas. This section includes policies that fall into four broad environmental goals set by the city and county:

Protecting Native Ecosystems and Biodiversity;

Enhancing Urban Environmental Quality;

Protecting Geologic Resources and Reducing Risks from Natural Hazards; and

Sustaining and Improving Water and Air Quality.

⁵⁰ *Id.* at 13.

⁵¹ CITY OF BOULDER & BOULDER COUNTY, COLO., BOULDER VALLEY COMPREHENSIVE PLAN: 2020 MID-TERM UPDATE 86 (2021), available at <https://bouldercolorado.gov/media/3350/download?inline>.

⁵² *Id.* at 68.

⁵³ *Id.* at 69.

Select notable policies include provisions for enhancing and maintaining ecosystem connections and buffers; maintaining and restoring natural ecological processes that reduce threats, such as wildfires and flooding; and having a no-net loss of wetlands and riparian areas.⁵⁴

In the plan, Policy 3.10 details the following climate-specific mitigation, adaptation, and resilience strategies for the natural environment:

1. Analyze the effects of climate change on local ecosystems and identify strategies to support ecological functions of natural systems under a changing climate;
2. Identify and monitor ecosystems most vulnerable to climate;
3. Protect large reserves of open space land to support the long-term viability of native plants and animals;
4. Restore degraded environments and manage natural ecosystems to enhance their resilience in the presence of climate change;
5. Address the wildland-urban interface environments to improve management natural resources and to reduce the potential for catastrophic wildfire; and
6. Include specific management guidance and direction regarding climate change mitigation, adaptation, and resilience in the preparation of city and county master plans.⁵⁵

Adopted in 2011, the City of Boulder Greenways Master Plan is another related planning document designed to preserve and increase the resilience of the natural environment. This stewardship plan for Boulder Creek and its tributaries creates management objectives for riparian areas, seeks to implement green infrastructure and flood mitigation projects, and coordinates the policies of other related city plans — including the Boulder Valley Comprehensive Plan — to ensure strategic and effective action.

Urban Environments and Green Spaces

The Boulder Valley Comprehensive Plan highlights policies to promote and enhance urban environmental quality.⁵⁶ These policies include developing community-wide programs and standards to reduce the environmental impact of new development and redevelopment projects in urban areas. Additionally, policies to manage and promote the expansion of urban forests in Boulder are highlighted, as urban tree canopy is an important piece to reduce the effects of climate change through carbon sequestration and extreme heat. The plan also lists water conservation measures through implementing water quality protection, public education, monitoring, and

⁵⁴ *Id.* at 55–57.

⁵⁵ *Id.* at 57.

⁵⁶ *Id.* at 58.

efficient water usage strategies and programs, highlighting Boulder's commitments to minimizing water waste.

Chapter 7 of the Boulder Valley Comprehensive Plan discusses overarching policies and standards for public services provided in urban areas.⁵⁷ Within this chapter, the plan provides specific guidance for developed urban parks including directives on funding, staffing, and infrastructure, as well as specific criteria for park location and facilities, as detailed below.⁵⁸

1. Provide neighborhood parks of a minimum of five acres in size within one half mile of the population to be served.
2. Provide community parks of a minimum of 50 acres in size within three-and-one-half miles of the population to be served.
3. Provide playground facilities for toddlers, preschoolers, and school-age children up through age 12 within one-quarter to one-half mile of residents
4. Provide other park and recreational facilities accessible to the public and in quantities sufficient to address public demand. Ensure availability of parks and recreation services to all economic segments of the community.
5. Schedule existing developed facilities for redevelopment as conditions and use dictate.⁵⁹

These commitments are an important component to incorporating green spaces equitably in urban areas in Boulder.

Land Use and Rural Preservation

The Boulder Valley Comprehensive Plan Land Use Map depicts desired land use patterns in Boulder Valley and sets forth a basic framework and guide for future land use, transportation, and zoning decisions.⁶⁰ Land use is divided into residential, industrial, business, open space, and other categories. Residential categories range from very low to very high density, while also including a designated category for manufactured housing.

Rural lands and open space preservation are important components of the Boulder Valley Comprehensive Plan's land use strategy. In an effort to preserve the rural character of the areas surrounding the city of Boulder, the plan states that a clear boundary will be maintained between urban and rural areas, when possible. Rural lands are designated for preservation based on

⁵⁷ *Id.* at 142.

⁵⁸ *Id.*

⁵⁹ *Id.* at 150.

⁶⁰ CITY OF BOULDER, COLO., BOULDER VALLEY COMPREHENSIVE PLAN LAND USE DESIGNATION MAP (2021).

environmentally sensitive areas, hazard areas, agriculturally significant lands, vistas, significant historic resources, and established, existing rural residential areas.⁶¹

The city also identifies opportunities to conserve open spaces through mechanisms like having the city and county purchase priority lands, accepting voluntary donations of fee simple interests from property owners, and promoting the use of conservation easements.⁶² Open space plans and policies in the city apply to public lands acquired and managed as natural, agricultural, recreational, cultural, and habitat conservation areas.⁶³ Currently, 63 percent of the Boulder Valley is protected as open space by the city and county.⁶⁴

COMMUNITY ENGAGEMENT

Section 10 of the Boulder Valley Comprehensive Plan covers Local Governance and Community Engagement. In this section, policies are listed to increase and improve community and youth engagement, communication between the local government and residents, and to encourage volunteerism.⁶⁵

In addition, considerable community engagement and action has and continues to take place around the city's MHC strategy. Several prominent community organizations, such as the Colorado Coalition of Manufactured Homeowners (CoCoMHO), are particularly involved in the protection of manufactured housing residents. CoCoMHO was founded by MHC residents in 2017 to provide yearly forums, resources, and mechanisms for action for MHC residents in Colorado.⁶⁶

Further, in 2017, the city adopted a strategic framework for engagement, which was developed by a Public Participation Working Group.⁶⁷ The working group highlighted two overarching recommendations in its preliminary report: change the culture of public engagement and utilize a comprehensive decisionmaking process. The resulting framework covers the why, how, what, who, and results of successful engagement. This framework is intended to be used in all public processes between the city and the residents, ranging from information sharing, to consultation, to involvement, and to collaboration on projects.⁶⁸

⁶¹ CITY OF BOULDER & BOULDER COUNTY, COLO., BOULDER VALLEY COMPREHENSIVE PLAN: 2020 MID-TERM UPDATE 39 (2021), available at <https://bouldercolorado.gov/media/3350/download?inline>.

⁶² *Id.*

⁶³ *Id.*

⁶⁴ *Id.* at 54.

⁶⁵ *Id.* at 101.

⁶⁶ *About Us*, COLO. COAL. OF MANUFACTURED HOME OWNERS, <https://www.cocomho.org/about-us> (last visited Jan. 4, 2022).

⁶⁷ CITY OF BOULDER, COLO., ENGAGEMENT STRATEGIC FRAMEWORK: PROPOSAL TO BOULDER CITY COUNCIL (2017), available at <https://bouldercolorado.gov/sites/default/files/2021-05/boulder-engagement-strategic-framework.pdf>.

⁶⁸ *Id.* at 7.

CONSIDERATIONS AND LESSONS LEARNED

The Boulder Valley Comprehensive Plan is a strong example of a municipal comprehensive plan that incorporates affordable housing, MHC, and anti-displacement provisions, as well as environmental and land-use considerations across the urban-rural spectrum. This plan can serve as an example of how a local government can holistically approach all of these different sectors in a diverse jurisdiction with a range of housing and environmental needs.

Moreover, the Boulder Valley Comprehensive Plan is an interesting example of a city and county policy designed to acknowledge the rural-urban divide and preserve the rural character of the surrounding areas. In addition, protecting natural resources and open spaces is especially important in places like Boulder that are facing increasing threats from flooding, extreme heat, and disaster events.

Notably, the city acknowledges the need for residents to be able to afford to live in their homes across different income levels through its low-, moderate-, and middle-income designations. Other local governments could similarly think about examining the demographics and economic makeup of their communities to support the development of an affordable housing approach that aims to address housing affordability for all.

Within this broader context, the city has applied focused attention to its MHC as one, but not the only affordable housing option. With its Manufactured Housing Strategy and Action Plan, Boulder developed a specific approach to address some of the priority issues facing one type of affordable housing in its jurisdiction. Similarly, the city followed suit with its Middle-Income Housing Strategy. Local governments also facing housing challenges can think about applying a specialized approach like Boulder's under an overarching comprehensive planning and housing framework.

In addition, the city is taking steps to implement and track its progress under the Manufactured Housing Strategy and Action Plan. For example, the city helped to preserve MHC — a goal under the Manufactured Housing Strategy — by purchasing the Ponderosa and Mapleton communities. These actions show the need to align plans with local actions to ensure that they are more achievable.