

Boulder County, Colorado

Proposal

The United States Department of Housing and Urban Development

Preservation and Reinvestment for Community Enhancement

Notice of Funding Opportunity

or

HUD PRICE NOFO

**- DRAFT for Public Comment -**

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HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

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Department of Housing and Human Services  
Boulder County, Colorado

**Exhibit A. EXECUTIVE SUMMARY**

## EXECUTIVE SUMMARY

### Overview

Aligned with a long-standing commitment to preserve manufactured housing (MH), the Housing Department of Boulder County, Colorado is seeking nearly \$10 million under the HUD PRICE NOFO to fund:

- 1 five-year, full-time project manager position to oversee PRICE activities.
- 100 low-income MH owners to address up to \$20,000 of health and safety repairs, code violation corrections, and/or energy efficiency and accessibility improvements.
- Replace up to 20 damaged, red tagged or otherwise at-risk mobile homes with new, energy efficient, all-electric manufactured homes.
- In part, purchase of one (1) manufactured housing community (MHC).
- Infrastructure improvements in one (1) or more MHCs.

In the county, MHCs are pockets of diversity. With 9 in 10 grant recipients in the Healthy and Resilient Mobile Homes Program reporting annual household incomes below \$50,000, 9 in 10 identifying as nonwhite, and 9 in 10 as Hispanic or Latino, the county has demonstrated its capacity, in collaboration with application partner, City of Boulder, and resident leaders in MHC, to meaningfully engage and reach diverse MHC residents.

### Background

#### **About the Boulder County Housing Department and its Partner**

The Boulder County Housing Department is a high-capacity organization located in the northern Denver metro area in Colorado. The housing department's housing authority oversees over 1,000 Housing Choice Vouchers. The 908-unit housing portfolio will nearly double with the 400-unit, mixed-tenure project now under construction. Operating in a high cost, low vacancy, job rich area, the county and its partners offer an array of services, ranging from eviction prevention and rental assistance to homebuyer training. A member of the Boulder Regional Housing Partnership, the county adopted the goal that 12% of homes countywide will be permanently affordable by 2035. Related to manufactured housing, Boulder County operates the Mobile Home Communities Program. In 2023, under the Healthy and Resilient Mobile Homes Program (HRMH Program), the county entered a \$3.5 million intergovernmental agreement with City of Boulder, which includes \$2 million of CDBG-DR for wind damage repairs, \$500,000 from the Office of Sustainability Climate Action and Resilience, and \$1 million of local county funds. The city also dedicated \$2 million in local Climate Tax funds to support wind damage repairs within city limits.

#### **Boulder County: Manufactured Housing Preservation Underway**

Nearly 3,500 households live in 32 MHCs in Boulder County. For two and a half decades, the Boulder Valley Comprehensive Plan has recognized MH as an important housing option, with goals to preserve MHCs, support resident owned communities (ROCs), and eliminate health and safety hazards. Aligned with these policies, City of Boulder, the county's PRICE proposal partner, has purchased two MHCs comprising over 200 units, performed flood improvements, funded infrastructure replacement, and set affordability restrictions. In 2019, the City of Boulder adopted its first Manufactured Housing Strategy. In 2022, the county and city partnered to respond to a federally declared wind disaster, which damaged over 400 MHs. Of 160 households

Exhibit A. EXECUTIVE SUMMARY

served by the HRMH Program, 90% identify as nonwhite, 90% as Hispanic or Latino, and 90% report annual household incomes at or below \$50,000. In Boulder County, \$50,000 annual income is below 50% of the Area Median Income (AMI) for a single-person household and below 40% AMI for a household of four. There is strong community leadership capacity in Boulder County. Working with these leaders underlies the program’s success. Finally, to preserve one MHC, Boulder County provided a \$1.1 million forgivable loan to residents to purchase their MHC, bringing total ROCs in Boulder County to three with 135 MHs.

**Challenges Remain**

Despite these efforts, more resources are needed to address decades of underinvestment in both MHs and in MHCs. From a climate justice perspective, this is critical work as temperatures and weather grow more extreme. In a 2023 survey of MHC residents in Lafayette and Longmont, one in four (1 in 4) respondents described their homes as in “poor/bad” condition and one third as in “fair” condition, yet 70% reported annual household incomes below \$40,000.

**Boulder County’s Proposal**

The county envisions thriving MHCs where affordable and sustainable manufactured housing offers safe, comfortable, accessible and dignified housing solutions for individuals and families. Fostering a culture of collaboration, equity, and environmental stewardship, we envision a future where manufactured housing is celebrated as a vital component of a diverse, resilient housing landscape, contributing to the well-being and prosperity of all who call them home. Through innovative design, responsible development practices, and inclusive policies, the Boulder County Housing Department aims to empower residents to achieve stability, security, and a sense of belonging in vibrant and supportive MHCs.

To maintain this important affordable housing and increase accessibility, while reducing housing instability and health risks, Boulder County seeks **\$9,948,500** in PRICE funds for these uses.

Use	Households Served	Amount
<b>Manufactured home repairs and rehabilitation:</b> Up to \$20,000 of grant-funded repairs per household for health and safety repairs, code violation corrections, and energy efficiency and accessibility improvements	~ 100*	\$2 million
<b>Manufactured home replacement:</b> Replace up to 20 heavily damaged, red tagged, or otherwise imminently at-risk mobile homes with new, energy-efficient, all-electric manufactured homes.	20*	\$4.28 million
<b>MHC acquisition:</b> Support the purchase and stabilization of one MHC.	TBD	\$760,000
<b>MHC infrastructure:</b> Improve infrastructure in 1 or more MHC(s).	TBD	\$2 million
<b>1 full-time, 5-year PRICE project manager position</b>	-	

\* With household incomes up to 60% of the Area Median Income (AMI), with priority to households at or below 30% AMI.

### **Long-term effects**

Long-term impacts anticipated from this proposal include:

- 130 low-income MH owners will enjoy more safety, comfort, accessibility and/or security of tenure from repairs, replacement and the purchase of one small MHC.
- Modern, safe infrastructure in one or two MHCs could reduce water leaks, better stabilize households against catastrophic displacement, increase resident trust in drinking water, and reduce household costs from purchasing bottled water and lower water bills.
- Low-income BIPOC households will benefit.
- Indoor air quality will improve, energy costs will stabilize, basic health and safety will improve, more homes will be accessible, comfort and safety will increase during extreme temperatures and weather, and homes will be more resilient in high winds and rain.

### **Conclusion**

If awarded, nearly \$10 million in PRICE funds would allow the Boulder County Housing Department to expand its investments in MHCs preservation, maintain affordability of valued housing stock, and improving the condition, energy efficiency and accessibility of homes and resilience of both MH owners and their homes. Under the Healthy and Resilient Mobile Homes Program, the county and partner, City of Boulder, will continue to work with community leaders in MHC to effectively distribute resources in predominantly low-income, communities of color.

Exhibit B. Threshold Requirements and Other Submission Requirements

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Department of Housing and Human Services  
Boulder County, Colorado

**Exhibit B. THRESHOLD REQUIREMENTS**

## Exhibit B. Threshold Requirements and Other Submission Requirements

### Threshold Eligibility

1. *Resolution of Civil Rights Matters.* The applicant, the Housing Department of Boulder County, Colorado, has no outstanding civil rights matters.
2. *Timely Submission of Application.* The applicant, the Housing Department of Boulder County, Colorado will submit its application in its entirety no later than the due date of July 10, 2024, no later than 9:59 p.m. Mountain Time (11:59 Eastern Time).
3. *Eligible Applicant.* The applicant, the Housing Department of Boulder County, Colorado is an eligible applicant, namely, “01 (County governments)”.
4. *Number of Applications.* The applicant, the Housing Department of Boulder County, Colorado will only submit one application.

### Other Submission Requirements

1. *Standard Application, Assurances, Certifications and Disclosures.* The applicant, the Housing Department of Boulder County, Colorado will complete and submit the following forms and sections with this application.
  - Standard Form 424 (SF-424) Application for Federal Assistance.
  - HUD 424-B, assuring that, if selected to receive an award, the Housing Department of Boulder County, Colorado will comply with U.S. statutory and other requirements, including, but not limited to, civil rights requirements.
  - Budget Form (424-CBW).
  - Assurances for Construction Programs (SF-424D) form.
  - Assurances for Non-Construction Programs (SF-424B) form.
  - Applicant Disclosure Report Form 2880 (HUD 2880).
  - The Federal Assistance Representations and Certifications section of the sam.gov registration has been completed.
  - Disclosure of Lobbying Activities (SF-LLL).
  - Certification of Lobbying Activities included in the NOFO application package.
  - Boulder County has a Code of Conduct that complies with the “Conducting Business in Accordance with Ethical Standards” section of the Administrative National and Department Policy Requirements and Terms for HUD Financial Assistance Awards” and will submit these with this application.

The applicant, the Housing Department of Boulder County, Colorado has completed a narrative describing its adherence to Affirmatively Furthering Fair Housing in Attachment C.

2. *Other Program-specific Requirements.*
  - a. Fair Housing and Nondiscrimination. In administering its PRICE-funded program, the Housing Department of Boulder County, Colorado and its partner(s) will comply with Fair Housing, non-discrimination and equal opportunity.

## Exhibit B. Threshold Requirements and Other Submission Requirements

- b. Limited English Proficiency (LEP). The Housing Department of Boulder County, Colorado and its partner(s) will take reasonable steps to provide meaningful language access to persons with LEP regarding any program, activity or service funded under this NOFO.
- c. Physical accessibility. The Housing Department of Boulder County, Colorado and its partner(s) will conduct all in-person meetings in locations accessible to persons with physical disabilities. All notices and communications by the program will be provided in a manner that is effective to people with hearing, visual and other communications-related disabilities and reasonable accommodations will be provided when necessary. Additionally, if the proposal were to build new covered multifamily projects (currently not proposed), it would comply with local, state and federal accessibility.
- d. Environmental Review. The Housing Department of Boulder County, Colorado and its partner(s) will comply with complete all necessary environmental reviews.
- e. Affordability. All replacement homes, and any MHCs assisted with infrastructure funds or purchased using PRICE funds, will adhere to a term of affordability as described in the HUD PRICE NOFO. Aligned with standard chattel loan timing, the allowed home sale price for a replacement home would be restricted for 15 years. In MHCs not already subject to terms of affordability, rent restrictions would be required with terms no shorter than 30 years and up to permanent, depending on the scenario. As per this HUD PRICE NOFO, the minimum affordability standards acceptable for compliance are the HOME Investment Partnerships Program (HOME) requirements at 24 CFR 92.252(a), (e), and (f) (rental housing) and 24 CFR 92.254(a)(1)-(4) (homeownership). HOME Investment Partnerships Program (HOME) requirements at 24 CFR 92.252 (e) and (f) (rental housing) will apply to Homesite Renters who will pay no more than 30 percent of gross income on housing costs, including site rental, fees, and utilities.

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**Exhibit C. NEED**

FACTOR (A): NEED

**What is your project area and the need for affordable accessible housing within it?**

**The Project Area: Boulder County, Colorado**

The project area is Boulder County, the northernmost extent of Colorado's Denver metro area. Boulder County is a job center in the metro area. It includes two Community Development Block Grant entitlement communities, Longmont and Boulder, and falls within the Boulder-Broomfield HOME Consortium. Geographically, the western portion of the county extends into the Rocky Mountains, increasing risk from wildfires, floods and high winds.

**High Growth, High Housing Demand**

The Denver metro area consistently ranks as one of the fastest growing areas of the country, with many high-paying jobs in industries such as aerospace, bioscience and technology. Like high-growth, job-rich areas nationwide, the project area faces a significant housing shortage. The greater metro area is estimated to be 50,000 homes short of what is required for balanced market conditions. In Boulder County, 18,000 homes will need to be affordable to low- and middle-income households to support diverse households across size and generation, yet only 6,000 housing units are currently affordable. Countywide, nearly two thirds of renters (64%, 2022 American Community Survey 1-year estimate) are housing cost burdened, meaning they pay more than 30% of their monthly income on housing costs. The rental vacancy rate in Boulder County is just 3.1%. Rental vacancy rates below 5% indicate a tight housing market. As the least expensive homeownership opportunity, despite rising monthly pad rents, manufactured housing communities (MHCs) in the area consistently boast near zero vacancy rates.

**The Subject Area: An Expensive Housing Market**

Housing costs are high in Boulder County. In January 2024, the median single-family detached home sales price was \$785,000 and the median attached home sales price was \$511,300. With current 30-year fixed mortgage rates just under 8%, a median income household (\$99,770) would require gap assistance and downpayment totaling \$267,000 to purchase the median priced *attached* home. (This assumes a modest combined monthly debt payment of \$500 for student loans, car loans, carried credit balance, etc.)

With pad lease rents between \$825 and \$1,094, three currently listed well-maintained, market-rate singlewide manufactured homes in Boulder County are listed between \$85,000 and \$199,000. Though this can be unaffordable, the barrier to entry, nonetheless, is far lower for this market-rate homeownership option relative to others.

**Housing Policy in the Subject Area**

In response to the high cost, tight market, the Boulder Regional Partnership (BRP), a countywide, multijurisdictional affordable housing partnership began in 2017. The BRP has a goal that 12% of homes in the county be permanently affordable by 2035. Except for 120 rent restricted pads in Boulder, mobile and manufactured homes (MMHs) are not included in this count because affordability is not guaranteed.

Preservation policies and stabilized land ownership can, however, reduce redevelopment risk for MMHs in up markets like the Subject Area. This table summarizes this preservation status.

**Table 1. MHCs Preserved by Preservation Policies and Stabilized Ownership, Boulder County Jurisdictions, 2024**

	Total		Preservation Policies		Stabilized Ownership					
					Resident		Nonprofit		Municipal	
	MHCs	Units	MHCs	Units	MHCs	Units	MHCs	Units	MHCs	Units
<i>Boulder</i>										
Number (#)	5	1,351	5	1,351	0	0	1	136	1	58
Share (%)	16%	39%	16%	39%	0%	0%	3%	4%	3%	2%
<i>Lafayette</i>										
Number (#)	8	879	8	879	1	34	0	0	0	0
Share (%)	25%	25%	25%	25%	3%	1%	0%	0%	0%	0%
<i>Longmont</i>										
Number (#)	10	775	10	775	1	40	0	0	0	0
Share (%)	31%	22%	31%	22%	3%	1%	0%	0%	0%	0%
<i>Unincorporated</i>										
Number (#)	6	363	6	363	1	61	0	0	0	0
Share (%)	19%	10%	19%	10%	3%	2%	0%	0%	0%	0%
<i>Other Communities</i>										
Number (#)	3	111	0	0	0	0	0	0	0	0
Share (%)	9%	3%	0%	0%	0%	0%	0%	0%	0%	0%
<b>Total (#)</b>	<b>32</b>	<b>3,479</b>	<b>29</b>	<b>3,368</b>	<b>3</b>	<b>135</b>	<b>1</b>	<b>136</b>	<b>1</b>	<b>58</b>
<b>Share (%)</b>	<b>100%</b>	<b>100%</b>	<b>91%</b>	<b>97%</b>	<b>9%</b>	<b>4%</b>	<b>3%</b>	<b>4%</b>	<b>3%</b>	<b>2%</b>

*Preservation policy*

In Boulder County, 97% of MMHs, or 3,368 of 3,479 are subject to such policies. **City of Boulder** and **Boulder County** have long-standing commitments to manufactured housing preservation. In 1985, Boulder adopted a “Mobile Home” (MH) zone, “to address redevelopment risk”, per the accompanying memo. In the 2000 update to the Boulder Valley Comprehensive Plan, a joint long-range plan between the two jurisdictions, a “Manufactured Home Park” (MH) land use designation was introduced to signal the city and county’s “intent to preserve affordable housing provided by the existing mobile home parks”. This update also introduced a manufactured housing preservation policy, “to provide a policy basis for protecting and preserving a uniquely vulnerable type of existing low-income housing”. The policy also commits to promoting resident owned communities (ROCs) and eliminate hazards. In their 2021 Comprehensive Plan update, **City of Lafayette** introduced a “Mobile Home” land use category “to preserve the existing stock of mobile homes”. Though somewhat weaker, **City of Longmont** has a “Mobile Home” (MH) zoning designation with no policy statement signaling intent to preserve the use. Any zoning change, nonetheless, must be publicly approved by Planning Board and City Council.

*Stabilized ownership*

Across Boulder County five MHCs comprising 9% of all MMHs have been further stabilized through ownership by a jurisdiction, a nonprofit affordable housing provider or the residents themselves.

1. Mapleton (135 home sites), Boulder: In 1996, City of Boulder purchased 135-home-site Mapleton using \$3.5 million of the Stormwater and Flood Control Utility Fund to improve the Goose Creek floodway, which bisects the community, then to sell the land to residents. Mapleton was removed from the floodplain, but residents could not finance the purchase, so affordable housing nonprofit, Thistle Community Housing, purchased it. Residents manage operations and 120 pad rents are permanently affordable between 30% and 60% AMI.
2. Ponderosa (68 home site, 73 units), Boulder: In 2017, City of Boulder purchased Ponderosa with \$4.2 million of CDBG-DR Infrastructure funds to replace failing infrastructure, reduce flood risk, preserve affordability and introduce low-cost, energy efficient replacement housing options for Ponderosa. Infrastructure and flood risk improvements were made in 2020. The local Habitat for Humanity affiliate is building replacement housing. Site-built homes are under construction on the western, previously unimproved edge. An *affordable modular housing factory* is under construction at school district headquarters. The factory will reduce construction impacts on Ponderosa and train the next generation of construction workers.

In 2017, Boulder County based Thistle Community Housing became a Certified Technical Assistance Provider for ROC-USA (Resident Owned Communities USA). Thistle has facilitated resident purchase of three MHCs.

3. Longmont Co-op, 40 homes, Longmont
4. Sans Souci Co-op, 61 existing homes (77 home sites), Unincorporated Boulder County
5. La Luna Co-op, 34 existing homes, Lafayette

*Colorado Mobile Home Park Act (MHPA)*

In the 2010s, Colorado's aging "mom and pop" owners began selling MHCs in large numbers. Many sold to out-of-state corporations. Enough experienced big rents hikes, predatory vehicle towing, changing rules, and even the closure of one 300-home site community in the southeast metro area, that MMH owners and community organizing groups turned to policymakers for help. Guided by the city and county's legislative agendas, beginning in 2019, staff from Boulder County and City of Boulder joined a coalition to craft legislative improvements to the Colorado MHPA. New laws introduced landlord-tenant dispute resolution, common amenity maintenance, clarified basic health and safety standards, and a meaningful Opportunity to Purchase for residents of MHCs, nonprofits and government entities.

**Manufactured Housing Safety**

The major remaining risks to preservation of MMHs are physical in nature. Except for the two MHCs purchased by City of Boulder, Ponderosa and Mapleton, where infrastructure has been replaced, infrastructure in these communities, predominantly established between 55 and 65 years ago, is beyond its useful life and therefore at risk of failure. Regular maintenance can reduce this risk just as a history of underinvestment can exacerbate it. Additionally, the condition of MMHs and natural hazards present ongoing risk as summarized in this table.

**Table 2. Safety of Mobile and Manufactured Homes by Community, Boulder County Jurisdictions, 2024**

	All	Pre-HUD Standards	Wildland Urban Interface	High Winds 160 - 175 mph	Pre-1994 Wind Zone Ratings	In 100-Year Floodplain
	Units	Units	Units	Units	Units	Units
<i>Boulder</i>						
Number (#)	1,351	495	1,001	1,351	826	50
Share (%)	39%	37%	74%	100%	61%	4%
<i>Lafayette</i>						
Number (#)	879	238	279	0	552	0
Share (%)	25%	27%	32%	0%	63%	0%
<i>Longmont</i>						
Number (#)	775	317	0	0	496	101
Share (%)	22%	41%	0%	0%	64%	13%
<i>Unincorporated</i>						
Number (#)	363	213	363	363	264	53
Share (%)	10%	59%	100%	100%	73%	15%
<i>Other Communities</i>						
Number (#)	111	60	12	12	80	0
Share (%)	3%	54%	11%	11%	72%	0%
<b>Total (#)</b>	<b>3,479</b>	<b>1,323</b>	<b>1,655</b>	<b>1,726</b>	<b>2,218</b>	<b>204</b>
<b>Share (%)</b>	<b>100%</b>	<b>38%</b>	<b>48%</b>	<b>50%</b>	<b>64%</b>	<b>6%</b>

In the Subject Area:

- *Building Standards:* Nearly 40% of MHCs were built prior to HUD Code enacted on June 15, 1976, which set minimum standards to reduce fire risk and improve construction quality and energy efficiency.
- *Age:* HUD estimates the habitable life of manufactured homes between 30 and 50 years, depending on climate and maintenance. Though repairs and upgrades can offset aging, all pre-HUD Code homes are beyond or nearing the useful life of their components.
- *Energy efficiency:* As the climate changes and temperature extremes increase, energy efficiency is more important than ever to stabilize housing costs and support basic safety. Nearly two-thirds of homes in the Subject Area were built prior to HUD energy-efficiency standards established in 1992, which prioritized purchase cost over living costs. Though improved over previous homes, the per square foot energy use of these homes significantly exceeds traditional single-detached, site-built homes. Three decades later, on May 31, 2022, incorporating newer considerations such as lower relative cost of certain components, the Department of Energy updated energy conservation standards for manufactured housing, resulting in improved energy efficiency.
- *Deferred maintenance and repairs:* Lacking other options, many low income MMH owners defer home maintenance or use lower cost, inappropriate materials. Some common repair and upgrade needs observed in MMHs include door and window

replacement, skirting replacement, and holes in the subfloor. It is relatively common for walls to separate from roofs, allowing water to intrude, mold to grow and structural integrity to be compromised. In a 2023 Boulder County survey of MHC households, one in four respondents described their homes as in “poor/bad” condition and an additional one-third described their homes as in “fair” condition. Nearly everyone described their homes as needing multiple repairs. Program staff working on mobile home wind damage repairs estimate that one in 10 wind-damaged homes are so compromised as to require replacement.

- *Wildfire Risk:* Referencing the Colorado State Forest Service 2022 map of wildland urban interface wildfire risk, the highest wildfire risk to MHCs is closer to the Foothills, near nature corridors or in the mountains. Half of units in MHCs in Boulder County exist in the Wildfire Urban Interface.
- *Wind Risk:* Located in Zone II of the national Wind Zone Map, maximum wind speeds in Boulder County range from 125 mph to the East to 175 mph in the westernmost populated area. Wind Zone Ratings were not applied to manufactured housing until 1994 in the wake of Hurricane Andrew’s devastation. The Marshall Fire on December 30, 2021 destroyed over 1,000 homes, and its associated straight line winds damaged 400 MMHs in and around Boulder. In the Subject Area, six in 10 MMHs were built prior to wind zone requirements.
- *Flood Risk:* The Subject Area is at high risk of flash flooding. As described previously, City of Boulder purchased 135-home-site Mapleton from a private owner and improved the floodway, ultimately removing Mapleton from the 100-year floodplain. When the city purchased 68-home-site Ponderosa from a private owner in 2017, all MMHs already met the Flood Protection Elevation for the 100-year floodplain. The entrance was relocated out of the high hazard conveyance zone, and stormwater management and detention areas were added. In the 2013 flood, two MHCs, one in Lyons and one in Longmont, were heavily damaged, homeowners were evacuated, and the communities ultimately closed. Six MHCs in the Subject Area remain in the 100-year floodplain, comprising 6% of area MMHs.

### **Is your project within or does it include any communities that meet Distress Criteria?**

#### **Distressed Criteria and Boulder County MHCs**

As a growing area with low unemployment (3.1%) and a 12.3% poverty rate compared to the 20% “distressed” threshold, Boulder County does not meet Distressed criteria. Boulder County’s poverty rate, however, exceeds that of the United States (11.5%) and Colorado (9%).

Census tract boundaries and even block groups can erase the lived experience in MHC as higher income neighbors reduce the appearance of poverty. For example, in 2017 when City of Boulder sought to purchase the Ponderosa property, the census tract did not meet the threshold for Area Benefit, which is 51% of people with incomes below 80% of the Area Median Income. A 100% income survey in Ponderosa, however, found that two thirds of household incomes fell in the “Extremely Low Income” HUD category or Below 30% of the Area Median Income (AMI).

In 2019, during the development of the city's [Manufactured Housing Strategy](#), the city partnered with university-based Boulder Affordable Housing Research Initiative (BAHRI) on a statistically significant census-like survey of MHCs in the city. Three-quarters (76%) of respondents reported their household incomes below \$40,000 annually. Boulder County conducted a similar survey partnered with BAHRI of MHCs in Longmont and Lafayette in 2023. Seven in 10 households in these communities reported annual incomes below \$40,000. To frame \$40,000 annual income in AMI, in 2023 a 1-person household with an income of \$40,000 was below 50% AMI and a 4-person household was just above 30% AMI.

In the [DR4634 Marshall Fire and Straight Line Winds](#) federal disaster, more than 1,000 Boulder County homes were destroyed by wildfire and 400 MMH owners reported wind damage to their homes. The city and county partnered to stand up the [Healthy and Resilient Mobile Homes Program](#) to address wind damage repairs. Of households assisted that completed optional demographic questions:

- Nearly 30% reported annual incomes below \$25,000 and nine in 10 reported annual incomes below \$50,000 annually.
- Nine in 10 identify as Hispanic or Latino and nine in 10 as nonwhite.

These data demonstrate both financial need as well as effective trust-building with nonwhite and Hispanic/Latino households.

### **Does your proposal increase resilience in any disaster-prone areas?**

#### **Increasing Resilience in Disaster-prone Areas**

While there are no Community Disaster Resilience Zones in Boulder County, the FEMA defined zones are those with extremely high National Risk Index Scores and those with disadvantaged community status as shown on the Council on Environmental Quality's Climate and Economic Justice Screening Tool. The Risk Index Score is calculated by multiplying the Expected Annual Loss by Social Vulnerability and then dividing by Community Resilience. The Community Resilience scores are the same across each county, regardless of census tract. A large factor in the Expected Annual Loss figure is the representative value of buildings (in dollars), which lowers the Risk Index scores for census tracts with fewer resources. It is estimated that there have been less than 40 days since 2010 when Boulder County has not been actively responding to or recovering from a disaster. For instance, Census Tract 127.07 includes the San Lazaro Mobile Home Park. It is a disadvantaged community in both the Climate Change and Wastewater categories, but its Expected Annual Loss is only "Relatively Moderate", and it has Community Resilience of "Relatively Moderate", so it does not have a high enough Risk Index Score to qualify as a CDRZ. Social Vulnerability for this census tract is Relatively High, and the Risk Index Scores for Riverine Flooding is very high. This community also faces a high risk for strong wind, tornado, and wildfire.

In the subject area we are aware of one heat-related death of an older mobile home owner. Increased energy efficiency will reduce this risk. Exterior repairs (roof, siding, skirting, windows, doors) will improve the resilience of older HUD-certified homes.

## What are the barriers to manufactured housing preservation or revitalization in your project area?

### **Boulder County's Manufactured Housing Preservation and Revitalization Strengths**

With over 20 years of commitment to MHC preservation, many of the common barriers to manufactured housing preservation and revitalization are reduced in this area. There is broad community awareness of the need for affordable housing and the value of MHCs as places that support aging in place, families and service sector workers. The relatively unique strengths in the Subject Area include:

- *Land use controls*: For 97% of MMHs, preservation policies and land use and zoning designations encourage preservation.
- *New state and local affordable housing funds*: Colorado voters passed Proposition 123 in November 2022 creating new funding for affordable housing. A new state mobile home program funds acquisition and infrastructure replacement at \$50,000 per mobile home site. For the early 2024 resident purchase of La Luna in Lafayette, for example, 37% of the \$4.5 million price was covered, leaving a balance of \$2.8 million to be financed by other means. In November 2024, voters approved a new affordable housing tax expected to generate \$18 million annually. The amount available for MMHs and other affordable housing needs has not yet been determined.
- *Resident organizing and self-governance*: Overall, community leadership capacity is strong.
  - Emergency Response Connectors (ERCs): Community leaders in six MHCs are paid to stay up to date on resources and share emerging issues with city staff and other ERCs.
  - Resident associations: The City of Boulder invests in assistance for resident association formation, which in turn promote access to resources, an understanding of MMH owner rights and community advocates.
  - Coalition of Manufactured Owners of Boulder (C-MOB): C-MOB hosts every-other-month meetings where MMH owners convene, share concerns and learn about resources.
  - Community leadership: In Lafayette, a justice ministry partners with statewide affordable housing faith coalition Together Colorado to train leaders and work on issues in MHCs.
  - Promotores de la Salud (community health workers): Promotores educate MMH owners to move more, eat healthy food and reduce sweetened beverage intake and advocate to address secondary water quality concerns in one MHC.
  - Self-governance: Since local affordable housing nonprofit Thistle Community Housing became a certified ROC-USA technical assistance provider, three communities in the Subject Area have become resident owned with cooperative boards. Mapleton has been managed by a resident nonprofit since the late 1990s.
- *Digital access*: In privately owned MHCs, internet and phone reception is often unreliable and some carriers that once offered low-income packages discontinued to practice leaving digital access out of reach. Partnered with area assistance organizations, libraries, the school district and a telecommunications partner, Bridging the Digital

Divide fosters new broadband options, distributes Chromebooks and offers technology training with robust outreach in MHCs.

- *Trust building*: Consistency, responsiveness, relationships and results all build trust. The Subject Area's network of community organizations and leaders as well as program responsiveness to disasters and MHC-specific emergencies continue to build trust with MMH owners, increasing connection and ability to deliver resources to a historically less supported housing sector and population.
- *Program Infrastructure and Experience*: Boulder County has invested in MHC preservation initiatives, hiring a project manager role. Since the county-city partnership for the Healthy and Resilient Mobile Homes Program began in 2022, more than 160 MMH have been repaired. Additionally, program staff have experience with funding, policy development, MHC infrastructure replacement, mobile home demolition and removal, community engagement and language access.

### **Barrier to Manufactured Housing Preservation and Revitalization in Boulder County**

Despite significant effort, barriers remain to ongoing efforts to preserve and revitalize manufactured housing in Boulder County, including:

- *Privately owned, market-rate MHCs* operate with relative autonomy. Barring operations conflicting with state or local laws, infrastructure outage or disaster, in these communities the primary preservation opportunity is MMH repair and replacement.
- *Few qualified general contractors* are willing to work on MMHs, especially with the demand to rebuild over 1,000 homes lost to the Marshall Fire.
- *High land values* in the Subject Area make MMH purchase by resident, jurisdictions and nonprofits to stabilize costs more challenging.
- In Colorado, a State Statute on Rent Control disallows local jurisdictions from regulating rent. *Park owners can charge what the market will bear*. If the housing market remains expensive and tight, over time this will cause economic displacement of the lowest income households or transfer the cost of rent subsidies to assistance organizations.
- In all but two of 32 MHCs, *infrastructure is approaching or beyond its useful life* and at increasing risk of failure.
- The *low incomes of MMH owners* suggest limited ability to support the cost of a traditional chattel loan on top of already high lot rents.
- Across the market area, *154 MMHs are in the 100-year floodplain*, excluding the 50 floodplain homes in Ponderosa where flooding was limited to sheet flow in the 2013 flood. In Ponderosa, MMHs already meet the flood protection elevation, floodplain improvements have been executed, and over time existing MMHs will be replaced with permanently affordable fixed-foundation modular homes.
- The *sunk expense of MMH demolition or removal* is significant, especially for a lower-income homeowner.
- *Standard-sized modern MMHs* are too large for many older MHC lots, which, in some cases, requires the sophistication to go before a zoning adjustment board and/or order a custom-sized home.

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Exhibit D. SOUNDNESS OF APPROACH**

## Exhibit D. SOUNDNESS OF APPROACH

### FACTOR (B): SOUNDNESS OF APPROACH

#### **What are your vision and goals?**

##### **Vision**

Our vision is to create a thriving community where affordable and sustainable manufactured homes provide safe, comfortable, and dignified housing solutions for individuals and families. Through innovative design, responsible development practices, and inclusive policies, we aim to empower residents to achieve stability, security, and a sense of belonging in a vibrant and supportive MHCs. By fostering a culture of collaboration, equity, and environmental stewardship, we envision a future where manufactured housing is celebrated as a vital component of a diverse and resilient housing landscape, contributing to the well-being and prosperity of all who call them home.

Management of MHC housing programs involves various aspects of providing and maintaining housing for individuals and families. This can include affordable housing, housing assistance programs, and more. Here are some key components of the MHC housing program goals.

##### **Planning and Goals**

Boulder County will develop and implement policies and plans to provide and maintain an MHC housing rehab/repair program, replacement of pre-HUD code homes, infrastructure improvements, and determining eligibility criteria and housing standards. The Boulder County MMH repair, rehabilitation and replacement program will focus on improving MMH throughout the county, including addressing health and safety measures, energy efficiency, code compliance, and accessibility. Applications will be available to households with annual income of 60% AMI or below with priority to households at 30% AMI and below. The county may, at its sole discretion, make funds available for dire emergency repairs/replacement regardless of the community.

MHCs in Boulder County provide affordable housing in Boulder County for many residents. There are 32 MHCs with about 3,500 homes throughout the county. However, homes are in various states of repair, and some are substandard. To maintain the asset of this affordable housing and reduce housing instability, a repair/rehab and replacement program will help increase the longevity of the housing stock. Furthermore, some MHC are in dire need of infrastructure improvement, primarily to antiquated water and sewer systems.

The goal of the program is to improve the lives of residents in MHCs that are most in need of housing repairs, and or replacement of Pre-HUD-Certified units. The program envisions racially equitable outcomes related to this PRICE application by improving the livability of housing stock where a higher percentage of Boulder County's BIPOC households live to meet HUD Housing Quality Standards and code compliance. The program will preserve housing for the County's lowest incomes, a key portion of its workforce, ensuring that a portion of the county's diverse households have secure homes. It will preserve an important component of the housing mix, by ensuring that a form of home ownership is within reach of those with the lowest incomes, among other goals. Finally, this application will go a good distance toward preventing large-scale displacements of many low-income BIPOC households residing in the county.

**Which eligible activities will you use to address the need(s) described in Factor (a)?**

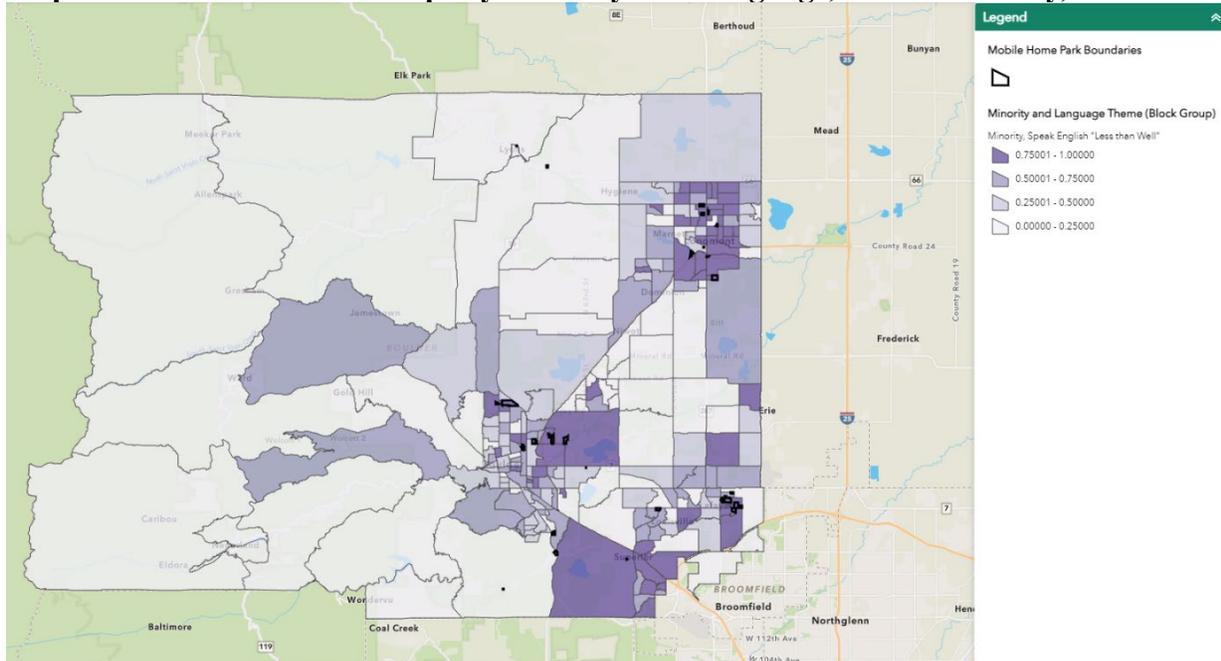
**Need and Eligible Activities**

This work continues a repair program modeled after the Healthy and Resilient Mobile Homes Program. The focus of the program would be on repairs, rehab, accessibility and replacement of substandard MMHs. The funds will mainly focus on homes that do not meet HUD regulations. Applications would be available up to households earning up to 60% AMI with priority to those facing imminent risk of displacement or documented health and safety issues, families, people over age 60, those with disabilities and households below 30% AMI. The program will develop an RFQ for contractors to assess MMH conditions, based on which a priority list of immediate health and safety items will be addressed. The initial funding of the program will work on MHC in Boulder County that are deemed as substandard mobile homes. Boulder County was awarded \$2 million in funding from Colorado Department of Local Affairs (DOLA) through the CDBG-DR program These funds are repairing wind damaged HUD-certified homes. Pre-HUD homes in which the homeowner is at imminent risk of displacement from health and safety issues or noncompliance with local building code will be replaced.

**Reaching Communities of Color**

The data reflected in this map outlines where the MHCs are located along with demographics. A higher percentage of BIPOC communities live in these communities. Many of the people hardest hit by COVID were over 60 years of age, parents and family caregivers, who left work to reduce risk, people in service businesses that closed, and in-person gig workers, who lost jobs or hours and by-in-large BIPOC communities. In Boulder County, incomes for this portion of the workforce are low, and so, they can only afford to live in MHC's. In sum, MHC were some of the hardest hit neighborhoods by COVID relative to other housing sectors.

**Map 1. MHCs and Block Groups by Minority and Language, Boulder County, 2024**



**What is your timeline and key tasks along that timeline?**

- **Repairing and rehab, 100 HUD-certified homes, 01/01/2025 – 12/31/2030.** Boulder County, in partnership with the City of Boulder, created a Healthy and Resilient Mobile Homes Program. The Boulder County Board of Commissioners allocated \$5 million in 2023 for this program, with funds targeted for mobile home repair and rehab work, ROC acquisition and infrastructure improvements. An IGA was executed between Boulder County and the City of Boulder for the Program. The program has provided \$1.1 million to support resident purchase of an MHC in Lafayette, Colorado. At the present time the program is also assisting with emergency repairs on 20 homes at Columbine MHC and 30 homes in Orchard Grove MHC. The repair/rehab funds requested under this NOFO will be integrated into this existing program, thus allowing the County to serve an additional 100 home that are in need of emergency repair and rehab work.
- **Replacement of 20 Pre-HUD Code homes, 01/01/2025 – 12/31/2027.** Boulder County has identified 20 homes that require replacement. These homes are in dire need of repairs, however due to the extensive amount of repair work required to bring into compliance with HQS and building code requirements the investment of funds would not be prudent nor advisable. Since these homes are Pre-1976, PRICE NOFO mandates that replacement is the only eligible course.
- **Invest in MHC infrastructure, 01/01/2025 – 12/31/2027.** There is need for infrastructure upgrades in a number of market-rate and cost-stabilized MHCs in Boulder County. If a market-rate property were to receive funding, affordability criteria and finance approach would be determined.
- **Support Acquisition of small MHC, 2025-2026.**

**What is your budget?**

The proposed budget includes:

Item	Cost	Description
1. Direct Labor	\$592,800	<b>PRICE Project Manager:</b> 1 FTE, 5 years
2. Fringe Benefits	\$148,200	<b>PRICE Project Manager</b>
3. Travel Costs	\$2,500	<b>HUD Trainings:</b> Airfare, lodging and per diem.
4. Equipment Cost	\$0	
5. Supplies and Materials	\$0	
6. Consultants	\$45,000	<b>Community-involved outreach and language services (translation and interpretation)</b>
7. Contracts and Sub-grantee Costs	\$0	

Exhibit D. SOUNDNESS OF APPROACH

8. Construction Costs	\$9,155,000	<p><b>Land acquisition:</b> Land purchase contribution, appraisal, survey (\$761,000)</p> <p><b>20 replacement homes:</b> Includes relocation expenses, demolition, environmental testing, new homes (\$4,277,000)</p> <p><b>MHC infrastructure:</b> Engineering, surveys and tests, inspection fees, construction (\$2,025,000)</p> <p><b>HUD-certified home repairs/rehab:</b> \$2,000,000</p> <p><b>2.5% Construction Contingency (repair and wastewater treatment construction):</b> \$92,000</p>
9. Indirect Costs	\$0	
<b>Total Estimated Costs:</b>	<b>\$9,948,500</b>	

**What are the projected impacts of your activities if implemented?**

Anticipated impacts from planned activities include:

1. **One smaller MHC will be acquired.** In a smaller jurisdiction, a smaller MHC can be acquired. The community is for sale on the open market and therefore the loss of this small, but important, pool of affordable housing is at risk. Once the property is purchased, improvements to the housing and property can be explored.
2. **MHCs that benefit from infrastructure funding will be more resilient as will households in this/these communities.** MHCs are disproportionately populated by very low-income households with little capacity to absorb rent increases in their household budgets. This investment of funds simultaneously addresses necessary infrastructure improvements while mitigating rent increases in these communities, resulting in creased resilience of the benefitting MHC and increased economic resilience.
3. **Up to 20 older, unsafe pre-HUD homes will be replaced with modern, energy-efficient manufactured homes.** The lowest income households struggle to maintain their homes, as most recently confirmed by applications received by the Wind Damage Repair Program. Around 10% of homes encountered by the Healthy and Resilient Mobile Homes Program have been too compromised to repair and lack any path forward, leaving households in deteriorated or otherwise unsafe conditions. Connecting these homeowners with replacement homes would increase the health and safety of this housing stock, advance the resilience of households against more extreme weather and temperatures, and stabilize them financially, eliminating the lurking need to invest in repairs.
4. **Up to 100 HUD-certified homes will receive health and safety, energy efficiency and accessibility upgrades.** The oldest HUD-certified homes will be 48 years old on June 15, 2024, approaching the more generous estimate of the life of manufactured housing.

## Exhibit D. SOUNDNESS OF APPROACH

As with any housing type, repairing and replacing components can extend the life of manufactured housing. These investments will stabilize this housing stock without burdening low-income households and advance household and housing resilience and safety.

### How will you ensure the availability of affordable manufactured housing options to LMI households?

#### The Incomes of MMH Owners Are Low

The program will prioritize households earning below 60% AMI or “low income” households. By in larger, households in MHCs in Boulder County earn below 60% AMI. Three-quarters of survey respondents in MHCs in Boulder, Lafayette and Longmont reported incomes below 50% AMI. Ninety percent of Healthy and Resilient Mobile Homes Program recipients report incomes below \$50,000 annually, which is below 50% AMI for a 1-person household and below 40% AMI for a 4-person household. Over 90% of households in MHCs own their homes outright.

Regarding each initiative, affordability will be advanced as follows:

- *MHC acquisition*: Boulder County would require a term of affordability of at least 30 years. As part of long-term stabilization planning, the affordability term may extend to permanent to align with the countywide goal that 12% of homes countywide be permanently affordable.
- *MHC infrastructure funds*: Recipients of infrastructure funding would be required to restrict rents for a period. Additionally, such financial support would reduce the necessity of rent increases to fund infrastructure repairs and/or replacement.
- *Mobile Home Replacement*: To balance homeowners’ wealth building against a significant investment of public funds (an estimated \$213,850 or \$200,000 for the home + \$10,850 for demolition-related expenses + \$3,000 for temporary relocation), for the first 15 years, recipients of replacement homes could only sell their homes for the appraised value of the old home plus an annual increase based on the indexed Homeownership Program appreciation formula, with a bottom annual threshold of 1% and cap at 3.5%. After 15 years, the full home value would transfer to the homeowner.
- *HUD-certified manufactured home repairs*: This grant-funded program would target low-income (60% AMI and below) households with no affordability restriction for participating households.

### What protections will be in place for residents?

#### Strong Protections in Colorado

Through a series of bills passed since 2019, Colorado’s Mobile Home Park Act offers some of the most robust landlord-tenant protections in the country, which greatly stabilize households, and are akin to those required by Fannie Mae and Freddie Mac. A Mobile Home Park Oversight Program offers dispute resolution, tenant notification 60 days prior to rent increase, a homebuyer/seller right to purchase or sell without landlord interference, and notice of intent to sell the land, change its use or close the MHC. In Colorado, pad leases renew indefinitely and

## Exhibit D. SOUNDNESS OF APPROACH

automatically, unless terminated for a permissible reason such as public health nuisance or nonpayment of rent.

### **Affordability**

Regarding affordability:

- Infrastructure investments will stabilize rents and eliminate the risk of a larger rent increase had infrastructure replacement been funded by property income.
- Acquisition funds can create true affordability in one MHC and in a smaller jurisdiction where this would make a meaningful impact.
- Replacement homes and home repairs in ownership-stabilized MHCs improve the resilience of the housing stock and households in these affordable communities. In market-rate communities, however, jurisdictions are prohibited from mandating rent control by the Colorado State Statute on Rent Control. In 2022, pad rent stabilization was stripped from a bill under threat of veto, suggesting no immediate legal remedy to rising rents. In some market-rate MHCs, however, to encourage new homes, pad rents are voluntarily reduced for several years. Eviction protections are robust in Colorado and across Boulder County. Both City of Longmont and City of Boulder offer mediation services. City of Boulder also offers Eviction Prevention services that can be accessed by MHC residents everywhere except in Longmont. Additionally, City of Boulder locally enforces a Human Rights Ordinance and its own landlord-tenant laws for MHCs.

### **How does your proposal encourage access to resources and financing, especially for underserved communities and persons?**

MHCs are unique pockets of diversity in the Boulder County that tend to house low-income households, persons of color, families, and people over age 60 living on fixed incomes at far higher rates than the surrounding areas. This program is well positioned to encourage access to these resources, building on a decade of policy and program effort to better integrate and resource households in MHCs, and encourage leadership within MHCs. The program would continue to work with community leaders, such as boards, resident associations and Emergency Response Connectors and pay individuals to reach their neighbors and contract translation and interpretation services for language access.

Though City of Longmont and City of Boulder have operated HOME-funded mobile home repair programs for decades, these programs support about 10 households annually, are capped at \$10,000 per home and typically have waitlists. Households in MHCs in unincorporated Boulder County, Lafayette, Louisville and other smaller jurisdictions aren't served by these programs. Furthermore, the per home spending cap proposed, \$20,000, would more thoroughly address the needs in older HUD-certified homes or more expensive items such as structural roof repairs.

When Boulder County surveyed households in MHCs in Longmont and Lafayette, one in four (1 in 4) described the condition of their homes as "poor/bad". Those in the worst condition tend to be occupied by the least resourced, lowest income households. Often, they are older and living in poverty with confounding factors such as a limited network, disability, limited English speaking, limited technology access, and lack of vehicle access. With proactive, inclusive community

## Exhibit D. SOUNDNESS OF APPROACH

outreach, trust built up over time, and access to networks in these communities, our program has identified 20 homes in very poor condition where homeowners, family and neighbors are seeking solutions to avoid displacement. This includes homes damaged more than a decade ago by the heavy rains that drove the 2013 flood, yet owners never received assistance. Replacing unsafe, unhealthy homes, and any at high risk of loss, is critically important as temperature and weather extremes are increasing and housing options are limited. Replacement housing can also alleviate crowding for families, including multigenerational families, by introducing additional bedrooms and more square footage.

### **What significant hazards could impact your project site(s)?**

Table 3, “Safety of Mobile and Manufactured Homes by Community, Boulder County Jurisdictions, 2024”, overviews primary hazards in the subject area, including fire, high winds and flooding, all discussed immediately after.

### **How does your proposal help advance Environmental Justice?**

Environmental justice is defined in the Notice of Funding Opportunity for the PRICE Competition as “investing in environmental improvements, remedying past environmental inequities, and otherwise developing, implementing, and enforcing laws and policies in a manner that advances environmental equity and provides meaningful involvement for people and communities that have been environmentally underserved or overburdened, such as Black and Brown communities, indigenous groups, and individuals with disabilities.”

Consistently, repairs and upgrade needs for homes in MHCs are a top concern for residents. It was one of the most expressed concerns in City of Boulder’s Manufactured Housing Strategy engagement events, in Latino/Hispanic-targeted outreach events, and in Boulder County’s survey of MHCs. For low-income households, there have not been adequate resources. This proposal responds to these concerns with replacement and repair programs. In so doing, climate-driven risks such as extreme temperatures and weather will be mitigated.

MHCs tend to be sited in some of more disaster-prone areas, especially floodplains, where land was less expensive when the community began. Over time, this source of environmental injustice is being addressed in Boulder County. City of Boulder entirely removed Mapleton Mobile Home Park from the floodplain with significant floodway improvements. In Ponderosa Mobile Home Park, the city made flood improvements such as introducing stormwater management, relocating the community’s entrance/exit out of the high hazard floodway and grading. As an equity initiative, City of Boulder is also investing in wildfire mitigation in MHCs in the wildland-urban interface. These climate and disaster mitigation investments, therefore, are less necessary for these funds.

### How will you seek and encourage diverse stakeholder participation?

When the proposal was posted, in addition to a bilingual English-Spanish press release, MHC resident networks were tapped with an email written using simple language principles. These networks included assistance providers, engagement staff, organizers, advocates and others with meaningful ties to MHCs. Nearly 60 members of the public, including predominantly MMH owners plus clean water advocates, faith groups, legal assistance groups, a disability rights advocate and others attended the public hearing. Slides were bilingual and interpretation was provided. The meeting ran 15 minutes long, or 105 minutes, to capture all comments.

If Boulder County is funded, a similar outreach effort would occur with public input sessions offered online and in the three areas with the most MHCs; the greater Boulder area, Lafayette and Longmont. Different programs will require different approaches to stakeholder participation. Larger initiatives, such as MHC infrastructure investments and MHC acquisition, will require deeper community engagement, which centers residents. The home replacement and repair opportunities proposed are in direct response to stakeholder input. Based on program success to date, the budget request includes language access and direct outreach support.

### How does your proposal align with existing community plans and policies?

The City of Boulder and Boulder County have long-standing commitments to manufactured housing preservation, beginning with Boulder's adoption of a "Mobile Home" zone "to address redevelopment risk" in 1985. The Boulder Valley Comprehensive Plan, a joint long-range plan between the two jurisdictions, includes a "Manufactured Home Park" land use designation, signaling the city and county's "intent to preserve affordable housing provided by the existing mobile home parks". A manufactured housing preservation policy provides "a policy basis for protecting and preserving a uniquely vulnerable type of existing low-income housing" while committing to promote resident owned communities and eliminate hazards. The City of Lafayette has a "Mobile Home" land use category "to preserve the existing stock of mobile homes".

Additionally, City of Boulder adopted a Manufactured Housing Strategy in 2019. This proposal aligns closely with these three Guiding Principles:

1. **Affordability:** Manufactured housing will continue to serve as an affordable market-rate homeownership opportunity. Programs and policies should be pursued to stabilize rent increases, reduce costs for home repairs, reduce home replacement costs, and reduce energy and water costs of and consumption by households in manufactured housing.
2. **Community:** Manufactured housing will continue to meet the needs of diverse populations, especially vulnerable community members. Programs and resources will be employed to support the needs of MHC residents.
3. **Viability:** Existing and new manufactured homes and the communities in which they are located will be safe, well-maintained and modernized, especially to become more energy efficient. Both for-profit and nonprofit communities must be able to perform well enough financially to cover current and capital expenses and provide a reasonable return on investment.

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Exhibit E. CAPACITY**

FACTOR (C): CAPACITY

**What is your capacity?**

**Francisco Padilla** has over 30 years' experience in business development, mortgages, underwriting finances, public housing, the Low Income Housing Tax Credit Program and the community planning and development industries. His background in all facets of community development is extensive and he has managed a wide variety of analysis and budget planning programs. He has supervised and managed a diverse employee base and can effectively work with program officials, customers, residents, clients, federal, state, and local government officials, citizen groups, and the broader public in a wide variety of sometimes programmatically complex and technical matters. He expertly negotiates complex issues, holds a real estate license and was an adjunct professor at University of New Mexico at the Graduate School of Architecture and Planning.

Mr. Padilla holds a Master of Urban and Regional Planning Degree from University of Colorado, completed an Executive Program in Public Affairs from University of Maryland, and a bachelor's degree in urban studies from Metropolitan State University.

In June 2023, he joined Boulder County as the Mobile Home Park Initiatives Project Manager, where he oversees policy and implementation for the Healthy and Resilient Mobile Home Program. Prior to joining Boulder County, he served as the State of Colorado's Recovery Officer, overseeing \$1.5 billion in American Rescue Plan Act (ARPA) recovery funds directed at creating affordable housing opportunities, and a wide array of homelessness programs and projects. As recovery officer, Mr. Padilla worked closely with local governments, for profit and nonprofit housing developers, homelessness services providers, and community stakeholders to most effectively and efficiently use those federal housing funds. NEWSERD Community Development Corporation in Denver, Colorado, he served as Real Estate Director, overseeing real estate investments and asset management of existing properties. For eight years, he worked as a private consultant for local, tribal, and state government and in business development, finance, housing, and community planning and development. Example clients included the Dina Development Corporation, a Subsidiary of the Navajo Nation and the Namba Pueblo Tribe of New Mexico. In this work, he helped establish a housing development program aimed at building single- and multifamily housing to primarily serve Native Americans.

For 14 years, Mr. Padilla served as the Director of the Office of Community Planning and Development with the Department of Housing and Urban Development in New Mexico where he: monitored and evaluated the processing, review, and implementation of all Community Planning and Development Programs; Housing, Planning and Development activities and programs in New Mexico; and implemented affordable housing programs throughout the State of New Mexico. For example, he:

- Developed programs to assist nonprofit or for-profit organizations in using HUD assistance for the creation of affordable housing;
- Established local partnerships to provide affordable housing within distressed neighborhoods;

## Exhibit E. Capacity

- Developed special initiatives to provide training and technical assistance to community-based housing development organizations on expanding the number of homeownership opportunities, particularly for first-time homebuyers;
- Advised and guided grantees on integrating the HOME and CDBG Programs into affordable housing efforts;
- Developed policies and procedures for the distribution of CPD program funds;
- Conducted meetings and training sessions to inform client groups, special interest groups, nonprofits, and for-profit housing developers and local, state, and federal officials of statutory, regulatory and administrative requirements inherent to HUD's Housing and Community Development Program;
- Translated legislation, regulation and HUD Headquarters guidance associated with CPD and housing development activities and responsibilities into action plans to be implemented in the State of New Mexico;
- Oversaw implementation of Continuum of Care Concepts in New Mexico;
- Established working partnerships with state, local, and federal agencies for the development and implementation of the Consolidated Plan;
- Ensured that local citizen participation, outreach and program planning efforts provide significant opportunities for diverse client groups to fully participate in the development and implementation of the Consolidated Plan and that provides a comprehensive approach to meeting local needs;
- Provided technical assistance to the State of New Mexico and the cities of Albuquerque, Las Cruces, and Santa Fe on economic development initiatives;
- Ensured timely performance and high quality of work;
- Managed staff to accomplish assigned functions, duties, activities and responsibilities;
- Coordinated and allocated travel funds;
- Provided guidance, advice, instruction and assistance; and
- Delegated work assignments within the office.

For one year, Mr. Padilla worked as the New Mexico-based Director of the Office of Native American Programs with HUD, where he:

- Developed regional policies and procedures for the distribution of CPD program funds;
- Reviewed grant statements and applications;
- Monitored grants and closed out completed projects;
- Directed, monitored, and evaluated the processing, review and implementation of all Community Planning and Development activities, and programs;
- Managed and supervised both Community and Housing Development staff;
- Served as the focal point in the development process;
- Monitored and evaluated the processing, review, and implementation of all aspects of development activity, which required a thorough knowledge of the development of public housing from application process through construction and fiscal closeout;
- Coordinated Housing Development activities with BIA, IHS, Tribal governments and State agencies in the Region;
- Led any and all negotiations with private contractors on housing construction disputes; and
- Hired employees and evaluated their performance.

## Exhibit E. Capacity

**Crystal Launder** holds a master’s degree in Regional Planning from Cornell University where she focused on community development and land use planning and a Bachelor of Art degree in Sociology and Psychology from Middlebury College. She has managed a variety of affordable housing, manufactured housing and disaster recovery-related projects over her twelve years with the City of Boulder. During this tenure, she was hired as a Housing Planner I, promoted to a Housing Planner II, promoted to a Senior Housing Policy and Planning Project Manager and recently transitioned to a policy advisor role promoting energy equity and resilient housing with the Climate Initiatives Department. She oversaw policy development and implementation for the city’s first [Manufactured Housing Strategy](#) and authored a Planning Advisory Services (PAS) memo titled [Preserving Manufactured Home Communities](#) for the American Planning Association, which explores the local means to preserve this important housing stock.

For 6.5 years, she was the project manager for the [Ponderosa Community Stabilization Project](#). In the wake of the 2013 flood, the Ponderosa MHC owners approached the city about failing infrastructure caused by pipes shifting in saturated soils. Ms. Launder prepared the successful Resiliency Planning Grant application in 2014. After an infrastructure study and community engagement, then an analysis of options, the city purchased the diverse, tight-knit 68-home Ponderosa with federal CDBG-DR funds to minimize displacement, preserve long-term affordability, replace outdated infrastructure, reduce flood risk to the community and introduce new energy-efficient affordable housing options. Centering minimal displacement in Ponderosa, Ms. Launder oversaw the work of the community engagement and planning team, including the planning lead, a cultural liaison and interpreter, a civil engineer, an architect and a landscape architect. She also oversaw the work of the property manager, lot remediation after service lines were run to homes, demolition and removal of pre-1976 homes sold by households who moved away, ensured compliance with the Uniform Relocation Act and Housing Quality Standards on resold HUD homes, the project budget, and CDBG-DR compliance reporting. She coordinated with the local Habitat for Humanity affiliate, the affordable housing partner, to develop a responsive housing option and developed deeply affordable lending products with the Community Development Finance Institution (CDFI), who will service them. With homeowners living in their homes, sewer and water infrastructure was replaced and floodplain improvements completed in 2020, followed by gas and undergrounding of electric and communications facilities in 2021. Five homes were under construction at Ponderosa when Ms. Launder accepted her current role with the Climate Initiatives Department in October 2023.

As a trusted partner in MMH policy and response, Ms. Launder served on a core response team as MHC residents began reporting damage from the straight line winds that drove the Marshall Fire on December 30, 2021. She helped identify the 10 highest priority households for assistance and supported distribution of “immediate” assistance to households, served on a wind damage recovery team and, under an Intergovernmental Agreement, she and **Laurel Mattrey, Policy Advisor, Climate Initiatives**, partnered with VOAD (voluntary organization after disaster) Mennonite Disaster Services (MDS) and Boulder County to bring repairs to impacted households in resident-co-op-owned Sans Souci Mobile Home Park. This community is located several hundred yards from where the fires began. MDS now touts this innovative partnership as expanding their impact.

Exhibit E. Capacity

**Ms. Mattrey** oversaw preassessment of damaged homes and pre-purchased materials to better leveraging MDS’s volunteer repair capacity, resulting in magnitudes more repairs than typical. With no federal or county funds available at that time, Ms. Launder and Ms. Mattrey then stood up a Wind Damage Repair Grant Program for Boulder MHC residents funded by a local Climate Tax with racial equity and climate resilience objectives. In Boulder, 184 MMH households have applied for assistance with wind repairs and 167 have received assistance at the time of this writing.

**Mrs. Mattrey** holds a Master of Urban Planning degree from the University of Buffalo and a Bachelor of Arts degree from Cornell University. She has managed building efficiency and upgrade programs for 15 years in school districts and municipalities. She has offered technical analysis, organizing support and policy advising in low-income communities of color facing superfund sites and hazardous waste-producing facilities. In addition to overseeing the Healthy and Resilient Mobile Homes Program, she implements the city’s Building Performance Ordinance, which advances comfort, indoor air quality and energy-efficiency in larger buildings in Boulder. Assisted by an AmeriCorps position, she administers all aspects of the Healthy and Resilient Mobile Homes Program, from contractor procurement to applicant tracking, to budget, invoicing and grant compliance.

**Ms. Launder** applied her affordable housing planning and policy expertise in program design and primarily supports community outreach and engagement for the program.

After **Mr. Padilla** joined the county in June 2023, local funds were allocated to mobile home repair, \$2 million of CDBG-DR funds were secured to repair HUD-certified homes and the Office of Sustainability Climate Action and Resilience (OSCAR) made additional funds available. Under an expanded IGA, the city and county launched the Healthy and Resilient Mobile Homes Program. To address basic health and safety repairs and code violations, 38 households recently applied for assistance, 19 of which are under contract with contractors at the time of this writing.

*Reference for Francisco Padilla*

June 9, 2024

To Whom it May Concern:

I am writing to support Boulder County's application to expand a mobile homes communities repairs and rehabilitation program for low to moderate income residents. In particular, the county's program is being directed by Francisco Padilla, a former and seasoned community development officer in U.S. Department and Housing Urban Development.

In addition, Mr. Padilla most recently worked as an ARPA Recovery Officer for the Department of Local Affairs (DOLA) while I served as Executive Director in the administration of Colorado Governor Polis. Finally, Mr. Padilla and I were selected to a competitive consultant team to administer a community FEMA disaster recovery grant

## Exhibit E. Capacity

award in Puerto Rico in collaboration with the National Association for Latino Communities Asset Builders (NALCAB).

I am confident the county has the capacity and with Francisco's experience to administer a grant award. Thank you for your favorable consideration for this HUD grant application.

Sincerely,

Rick M. Garcia  
Former Executive Director,  
Colorado Department of Local Affairs and  
U.S. HUD Region VIII Administrator

### *Reference for Crystal Launder*

Crystal Launder has been a thoughtful partner for Flatirons Habitat for Humanity on our work for the Ponderosa Mobile Home project. Crystal has a breadth of expertise that provides insights into solving problems in an innovative way with a focus of serving the people impacted by the project.

Linda Sanders  
Associate Executive Director  
Flatirons Habitat for Humanity

### *Beneficiary Testimony from Healthy and Resilient Mobile Homes Program Documenting Laurel Mattrey's Project Management Impact*

After receiving repair assistance through the Healthy and Resilient Mobile Homes Program, grant recipients receive a short survey. Below are some sample responses.

- "There was a lot of damage to my property from the windstorm. I made as many repairs as I could make on my own. It was excellent having the support of the City to make the last needed changes."
- "Fantastic, kept in touch the whole time. Worked quickly. This has given me much equity in my home for me and my sons after me."
- "Our windows have been installed. I am so happy to know we are now able to open the windows in case of an emergency. [The] window was so fragile that when we would open it before it almost fell inside. With the new installed windows more sunlight comes in. We also noticed the house being warmer. The guys did an awesome job. I would strongly recommend them. They were always very nice and pleasant, letting us know what the next steps would be."
- "When I applied for this, the City of Boulder kept me very well informed on the next steps and how everything would be planned out. Kelley did an amazing job explaining what was going to come next. She was also helpful with the communication with [the contractor] and was there to answer any questions that arise."

## Exhibit E. Capacity

- “They were amazing and so professional. The quality of work matching the older stuff was very impressive. They also found so much more water damage and did the work.”
- “I want to thank everyone involved in this project. The repairs they made to my house make me feel safer and I'm saving energy for the improvement of the windows. Thanks a lot.” (Translated from Spanish.)

### What is your experience using grant funds?

**Francisco Padilla** has decades of experience overseeing and using grant funds. Highlights include:

- *State of Colorado Recovery Officer, 1 year.* Oversaw \$1.5 billion in American Rescue Plan Act (ARPA) recovery funds directed at housing opportunity and homelessness programs and projects.
- *Housing and Urban Development Director of the Office of Community Planning and Development in New Mexico, 14 years.* Monitored and evaluated the processing, review and implementation of all Community Planning and Development Programs as well as Housing, Planning and Development activities and program and affordable housing programs.
- *Housing and Urban Development Director of the Office of Native American Programs in New Mexico.*

**Crystal Launder** has worked with the following funding sources:

- *CDBG-DR, Infrastructure: \$4.2 million.* These funds supported the acquisition of Ponderosa Mobile Home Park to replace sewer and water infrastructure. Ms. Launder prepared quarterly progress reports, ensured compliance with the Uniform Relocation Act, especially for two households who relocated within the community to facilitate new stormwater detention ponds, the Davis-Bacon Act for construction contractor wages, and Housing Quality Standards for HUD Code homes transferred to Ponderosa households. No issues were encountered.
- *Local Health Equity Funds: \$1 million.* Funded by the Sweetened Beverage Tax, these monies supported water infrastructure replacement costs. Ms. Launder tracked fund use and completed a final report. No issues were encountered.
- *Local Affordable Housing Funds: multiple millions.* Ms. Launder no longer oversees this project, so cannot provide a precise dollar amount. She provided quarterly progress reports, including for infrastructure construction and a \$3.2 million funding agreement with housing partner Flatirons Habitat for Humanity. No issues were encountered.
- *American Rescue Plan Act Funds, \$3 million.* Ms. Launder advocated for funds for a second mortgage program to make housing payments affordable for the many extremely low-income households in Ponderosa. These funds are now held by Colorado's CDFI to disperse to qualified households. No issues were encountered.

**Laurel Mattrey** has managed building and community-based projects and programs for the last 15 years in school districts and municipal government. She coordinated district-wide building-

## Exhibit E. Capacity

based energy, water and waste management projects at Denver Public Schools for 8 years and has administered the commercial building efficiency ordinance and the Healthy and Resilient Homes Mobile Home Repair Grant program with City of Boulder for the last 4 years. Prior to working with school districts and municipalities, Laurel worked with several private consulting firms to coordinate community engagement and plan development for US Forest Service, Bureau of Land Management and Air National Guard.

### Who are your key staff?

**Francisco Padilla, Mobile Home Park Initiatives Project Manager, Boulder County**, will oversee and administer the PRICE Grant Programs.

With a breadth of relevant implementation experience, **Crystal Launder, Energy Equity Policy Advisor, Climate Initiatives, City of Boulder**, will serve in an advisory capacity for the duration of the project's life cycle.

With extensive experience administering grant-funded programs and working with contractors to advance energy efficiency and environmental justice, **Laurel Mattrey, Energy Policy Advisor, Climate Initiatives, City of Boulder**, will either administer or overseeing future staff who administer the Healthy and Resilient Mobile Homes Program. This program will be responsible for the health and safety, energy efficiency, code compliance and accessibility improvements to HUD-certified manufactured homes.

### What is your experience promoting racial equity?

Both Boulder County and City of Boulder are members of the Government Alliance on Racial Equity (GARE). Projects implemented by both are reviewed for racial equity considerations and advancement. Francisco Padilla, in his former capacity as the Director of the Office of Community Planning and Development and the Office of Native American Programs, was acutely aware of all civil rights requirements of Title 6 and 8 of the 1964 and 1965 civil rights legislation pertaining to equity in the delivery of housing programs.

Ms. Launder and Ms. Mattrey have extensive histories working with Black and Brown communities that extend beyond their tenures with City of Boulder and both sit on their department's Justice Equity, Diversity and Inclusion committee. They have partnered on addressing inequity in MHCs since 2019. That initial partnership began after a community member reported noncompliance with the city's Dark Skies Ordinance in a 630-household MHC. An initial segment of homes was reviewed for noncompliance and nearly all served with notices of noncompliance with a schedule of escalating fines and court appearances if deadlines weren't met. Fearful and without the time, money and expertise to upgrade their exterior lighting, some MMH owners contacted Emergency Response Connectors in this community who then raised awareness about the challenging situation. Ms. Launder identified initial funding for grant funded repairs and developed a streamlined grant application appropriate for relatively small grant amounts. Working with the Engagement Department, they partnered with the environmental justice organization Foundation for Leaders Organizing for Water and

## Exhibit E. Capacity

Sustainability (FLOWS), community organizers 9 to 5 Colorado, and an informal group of community leaders that refer to themselves as Si Se Puede (yes we can) to develop a door knocking campaign in the predominantly Latino/Hispanic community, inform homeowners and encourage them to apply for assistance, if necessary. Ms. Mattrey accepted grant applications and contracted with an electrician who assessed and upgraded noncompliant outdoor lighting. This initial approach is the blueprint for the Healthy and Resilient Mobile Homes Program, which focuses on maximizing program reach and impact.

### **What is your experience completing environmental reviews?**

Mr. Padilla has an extensive background in the oversight and performance of environmental reviews. In his capacity as the HUD CPD Director State of New Mexico and Director Office of Native American Programs New Mexico, Mr. Padilla performed environmental reviews in accordance with 24 CFR part 50 and part 58 on various programs i.e. CDBG, HOME, ICDBG, Shop Program. Mr. Padilla provided training and TA to HUD grantees and subgrantees on all aspects of environmental process and requirements. In his current position with Boulder County Mr. Padilla has taken the lead of all environmental requirements of CDBG-DR funds recently awarded to Boulder County.

### **Are you familiar with cross-cutting federal requirements?**

Mr. Padilla is very knowledgeable on all aspects of cross-cutting federal regulations as outlined in 2 CFR part 200. In his various managerial positions at HUD was responsible for the oversight of HUD grantees. These grantees included State, Tribal, City and County governments. Boulder County currently administers various HUD programs that require knowledge and understanding of all 2 CFR part 200 requirements, as well as Davis-Bacon labor standards. Mr. Padilla's experience in working with HUD programs CDBG, ICDBG, HOME, and other related programs has made him uniquely qualified to provide the required oversight and technical assistance to guide the implementation of HUD PRICE Program.

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Exhibit F. MATCH OR LEVERAGE**

## Exhibit F. Match or Leverage

### FACTOR (D): MATCH OR LEVERAGE

#### **Will you be matching or leveraging other funds?**

The County intends to integrate the PRICE Grant into the Healthy and Resilient Mobile Homes Program where \$5 million were appropriated by the Boulder County Board of Commissioners and the County was recently awarded \$2 million of CDBG-DR to support wind damage repairs in HUD-certified manufactured homes. Additionally, the City of Boulder has dedicated \$2 million of local funds to mobile home wind damage repair within city limits.

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Exhibit G. LONG-TERM EFFECT**

FACTOR (E): LONG TERM EFFECT

**What will be the long-term effect of the proposal?**

Aligned with our vision of a thriving community where affordable and sustainable MMHs provide safe, comfortable, and dignified housing solutions for individuals and families, the long-term impacts of this proposal will be:

- **130 affordable homes that serve as critical housing stock, especially for low-income households, older households, and people of color will be retained by (a) reinvesting in older HUD-certified homes, (b) replacing unsafe homes in poor condition, and (c) acquiring one smaller MHC from the open market.** The State Statute on Rent Control limits county and local government from imposing rent restrictions, limiting affordability measures in market-rate MHCs; however, some repairs and replacements are anticipated to serve households in resident- and nonprofit-owned communities. A 15-year term of affordability will be applied to replacement homes, balancing public investment with a homeowner's wealth building opportunity. Affordability will be contractually required in the acquired property through covenant or agreement. Robust resident protections in Colorado's Mobile Home Park Act, further preserve this housing option.
- **MHC infrastructure funds will introduce modern, safe infrastructure into one or more MHCS, potentially reducing water leaks, stabilizing the community long-term against displacement, and increasing resident trust in drinking water, which can reduce the purchase of bottled water and reduce household costs.**
- **This program is expected to disproportionately assist low-income families with children, people of color, and older individuals. These households will enjoy improved air quality, stabilized energy costs, increased safety, greater accessibility, more comfort and safety on extreme temperature days and their homes will be more resilient when the next extreme weather event, especially rain and wind, occurs.**

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Attachment A. Advancing Racial Equity**

## Advancing Racial Equity Narrative

### *Boulder County*

On January 27, 2021, [the Boulder County Commissioners](#) released a statement in support of President Biden’s Executive Order on Advancing Racial Equity and Support for Underserved communities. In this statement, the commissioners pointed to the alignment of the Executive Order with the county’s Strategic Priority around Equity and Justice. As a core member of the Government Alliance on Race and Equity, Boulder County leads with race, recognizing that “the creation and perpetuation of racial inequalities has been baked into government, and that racial inequities across all indicators for success are deep and pervasive.”

### *City of Boulder*

In 2021, City of Boulder adopted a Racial Equity Plan focused “on steps the city must take to eliminate systemic and institutional racism in its policies and practices”. Related to this commitment:

- City staff must complete three racial equity trainings
- All city departments must establish a Justice Equity Diversity and Inclusion team.
- A Community Connectors in Residence program
  - Shares feedback on community engagement barriers;
  - Surfaces community issues; and
  - Connects over 1,500 community members who might not otherwise receive important information.
- City staff must use a Racial Equity Instrument to develop, implement and evaluate City of Boulder policies, programs, practices, procedures, and budget issues to advance racial equity.

### *MHC Surveys*

Census tract and block group boundaries don’t typically conform to MHCs. In more affluent communities, this can erase the appearance of the lived experience within these neighborhoods.

To better understand the demographics in MHCs, in 2019 City of Boulder partnered with the Boulder Affordable Housing Research Initiative (BAHRI) on a census-like survey of MHCs. Compared to city residents overall, MHC resident respondents to this statistically significant survey were nearly three times more likely to identify as Latino (26% vs. 9%). Four percent identified as mixed race, 1% as African American and 4% as Asian. In the home, 22% of households spoke a language other than English (20% Spanish and 2% Nepali). Disabled residents were more likely to be older, have lower incomes and own their homes.

In 2023, Boulder County partnered with BAHRI on a similar survey of MHCs in Longmont and Lafayette. Among 252 completed surveys, 66% identified as “Hispanic, Central, South American or Spanish Heritage”. In homes, 48% of households spoke Spanish and 3.4% another language with 48% speaking English.

From its work in MHCs, Healthy and Resilient Mobile Homes Program staff have identified the following potential barriers to accessing the program:

- Language

## Attachment A. Advancing Racial Equity Narrative

- Disabilities, particularly mental health-related
- Limited written language skills
- Limited networks
- Cultural unfamiliarity with grant programs and how certified contractors work
- Lack of familiarity and distrust in government.
- Multiple jobs and childcare
- Lack of computers and printers in the home
- A preference for smartphone technology and texting over email.

To address these barriers, the program:

- Provides Spanish and English applicant portals.
- Uses the LanguageLink interpretation service.
- Uses simple language in communications.
- Translates legal documents and written communications and hires interpreters for community events, including Nepalese and Bosnian, to date, in addition to Spanish.
- Holds events in the evening and on-site.
- Works with trusted liaisons in each community (the co-op board, members of the resident association, the property management team, the Si Se Puede team, promotas, school liaisons, active nonprofit organizations, etc.).
- Pays trusted liaisons to door knock, make phone calls, join on-site events, etc.
- Maintains a program cell phone for text communication.
- Prints materials out for pick up and drops off printed materials upon request.
- Follows through, admits to errors, addresses errors, communicates.

The Healthy and Resilient Mobile Homes Program monitors its effectiveness at advancing racial equity. As evidence of the effectiveness of these tactics, only 10% of grant recipients identify as white. Similarly, 90% identify as Hispanic or Latino.

Program staff have observed an alarming number of predatory scams in MHCs and have grown skilled at identifying trusted programs and individuals who can help build trust and connection.

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Attachment B. Affirmative Marketing Narrative**

### Affirmative Marketing Narrative

According to HUD, affirmative marketing is a marketing strategy that aims to promote fair housing by attracting eligible households to available housing without regard to race, color, national origin, sex, religion, familial status, or disability. The goal is to increase the diversity of the applicant pool and house a more diverse population.

Due to the geographic size of Boulder County and known addresses of MHC households, if PRICE funds were awarded to Boulder County for the various program activities, the county can effectively and affirmatively market by continuing its current outreach practices, as described in Attachment A.

#### *Affirmatively Marketing the Manufactured Home Repair and Rehabilitation Program*

Boulder County is requesting \$2 million for manufactured home repair. At around \$20,000 per home, around 100 owners of HUD-certified manufactured homes, built on or after June 15, 1976, could enjoy (a) addressed health and safety issues, code compliance, energy efficiency measures and/or (b) improved accessibility. Households earning at or below 30% AMI would be prioritized. Standard outreach would include website promotion, press releases and social media for the target audiences. The following affirmative marketing techniques would be used.

#### Deeper outreach approaches for Repair/Rehab

To reach...	We would...
Spanish speaking households, those identifying as Hispanic or Latino, those who identify as a race other than white.	<ul style="list-style-type: none"> <li>• Provide outreach materials, agreements and application portals in Spanish and English.</li> <li>• Use simple language in outreach.</li> <li>• Notify cultural broker network, community connectors, service providers, school liaisons, community organizers, promotores du salud, etc.</li> <li>• Pay liaisons/MHC resident leaders to door knock, text and make phone calls in given communities.</li> <li>• In-person in MHCs and trusted spaces.</li> </ul>
Disabled households with accessibility needs	Notify the Center for People with Disabilities, Area Agency on Aging, City of Boulder Older Adult Services, Longmont Senior Services. Post information in senior centers. Present in person in these spaces.
Homeowners with the greatest health and safety and energy efficiency challenges.	<ul style="list-style-type: none"> <li>• Use Assessor’s data, namely “year built” to identify older, owner-occupied homes for targeted outreach.</li> <li>• Talk to resident associations, co-op boards, property managers, etc.</li> <li>• Talk to assistance organizations, case managers, etc.</li> </ul>

## Attachment B. Affirmative Marketing Narrative

### *Affirmatively Marketing the Mobile Home Replacement Program*

Boulder County is requesting \$4 million to replace 20 unsafe, displacement risk mobile homes with new, energy-efficient, all-electric manufactured homes. Without vetting households, the Healthy and Resilient Mobile Homes Program staff is aware of 12 priority living situations to address ranging from already red tagged as uninhabitable and displaced to imminent risk of displacement and/or health and safety concerns.

Recognizing that those with the greatest needs, and/or their advocate neighbors and family, will likely have already sought assistance, program staff will connect with county recovery staff to identify additional known households with priority needs, and focus initial outreach on case managers and rental assistance providers with organizations such as Emergency Family Assistance Association, Sister Carmen, the OURS Center, Jewish Family Services, Mental Health Partners, Older Adult Services, Center for People with Disabilities, the Family Resource Schools program. Also included in this initial outreach pass will be school liaisons, faith communities, resident associations, co-op boards, Community Connectors, cultural brokers, and government entities across the county. Due to limited resource, we don't anticipate needing to preform more broad outreach.

### *Affirmatively Marketing the Mobile Home Park Acquisition and Infrastructure Replacement Programs*

Boulder County is aware of priority communities for these resources due to known infrastructure issues and/or the community being posted for sale. Additional outreach would only be necessary if known potential investments don't work out.

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Attachment C. Affirmative Furthering Fair Housing Narrative**

### **Affirmative Furthering Fair Housing Narrative**

HUD's Affirmatively Furthering Fair Housing webpage states that, "The Fair Housing Act requires HUD and its recipients of federal financial assistance to do more than simply not discriminate; they must take meaningful actions to overcome patterns of segregation and foster inclusive communities." The obligation to affirmatively further fair housing requires recipients of HUD funding to take meaningful action, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics, including:

- Race
- Color
- National origin
- Religion
- Sex (including gender identity and sexual orientation)
- Familial status (presence of children in the home)
- Disability

To this end, Boulder County must:

- Determine who lacks access to opportunity and address any inequity among protected class groups
- Promote integration and reduce segregation
- Transform racially or ethnically concentrated areas of poverty into areas of opportunity.

### **Denver, Aurora, Boulder 2019 Regional Analysis of Impediments to Fair Housing Choice**

Boulder County joined other Denver metro area communities, including Denver and Aurora for the 2019 Analysis of Impediments to Fair Housing. HUD encourages regional collaboration on these studies. From this analysis:

- There are no racial or ethnic concentrations of poverty in Boulder County.
- The report identified some housing challenges unique to the Boulder-Broomfield area (Boulder County and Broomfield County), including:
  - Low homeownership rates by racial and ethnic minorities, especially among African Americans;
  - Disability discrimination particularly in Boulder city and somewhat less so, but still, in Longmont; and
  - Resistance to development and strong prioritization of open space preservation over affordable housing development.
- None of the solutions proposed by the report were specific to the Boulder-Broomfield area, however the following Regional recommendations are relevant to the use of these PRICE funds;
  - Partner with public schools to provide information and referrals to families in precarious situations.
  - Provide fair housing information on websites.

Both Boulder County and City of Boulder provide fair housing information on their websites and fair housing accommodations are offered through the Healthy and Resilient Mobile Homes Program, as well as language accommodations and much more. Program staff also work with school liaisons to identify those households in precarious situations.

**Program-specific approaches to Affirmatively Further Fair Housing**

Boulder County has a strong understanding of who lives in area MHCs. Most of the households served to date by the Healthy and Resilient Mobile Homes Program are some combination of minority by race, color, and national origin. Many are families with children under 18 and some reported living with disabilities. The racial equity and affirmative marketing techniques described in attachments A and B have been used by the program to successfully engage and support households who have historically had less access to resources.

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Attachment D. Eligible Applicant Documentation**

## Attachment D. Eligible Applicant Documentation

### **Eligible Applicant Documentation**

The applicant, the Boulder County Housing Department in Colorado, is an eligible applicant as described in Section III. A of the NOFO as it is a department within “01 (County government)”.

The Boulder County Housing Department is the lead applicant on this PRICE grant application. Boulder County would partner with the Climate Initiatives Department in the City of Boulder, Colorado to implement the proposed project.

City of Boulder is also an eligible partner “02 (City of township governments)”. City of Boulder and Boulder County have a long history of collaboration, with long range planning, development proposals and other activities that shape the built and natural environments guided by the [Boulder Valley Comprehensive Plan](#), both organizations active in the [Boulder County Regional Partnership](#) and both entities active in the [Boulder-Broomfield Regional HOME Consortium](#). The Boulder County Housing Department and Climate Initiatives Department in City of Boulder are already operating under an intergovernmental agreement (Attachment A) and an Letter of Intent to Partner on PRICE is included in this section.

Additional relevant links:

[Boulder County Fair Housing and Reasonable Accommodation](#)

[Boulder County Housing](#)

[Boulder County Mobile Homes Program](#)

### **Eligible Applicant Attachments:**

1. Partnership Letter of Intent
2. Health and Resilient Mobile Homes Program IGA

Boulder County  
P.O. Box 471  
Boulder, CO 80306

City of Boulder  
City Manager's Office  
Climate Initiatives Department  
1777 Broadway St.  
Boulder Colorado

Date: June 4, 2024

Re: Intent to Participate in Boulder County CDBG-PRICE Funds

This letter is to confirm the mutual intent of both Boulder County and City of Boulder to collaborate and enter into an intergovernmental agreement (IGA), contingent upon the award of funds from the United States Department of Housing and Urban Development for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out manufactured housing repair and rehabilitation activities as provided in the Boulder County CDBG-PRICE application.

The City of Boulder is a municipal government entity located in Boulder County, Colorado, a CDBG Entitlement Community, a member of the Boulder-Broomfield HOME Consortium and a member of the Boulder County Regional Housing Partnership. Under their jointly adopted comprehensive plan, the city shares in Boulder County's recognition of manufactured housing as an important housing option and its commitment to:

- Preserve existing manufactured home communities;
- Increase opportunities for resident owned communities; and
- Make every reasonable effort to address health and safety issues.

Under an existing IGA, City of Boulder administers an emergency and disaster repair program for manufactured housing called the Healthy and Resilient Mobile Homes Program. The manufactured housing repair and rehabilitation work proposed by Boulder County under the CDBG-PRICE application would expand this partnership.

This letter is an expression of our intent to partner with Boulder County. If Boulder County is funded for this work, the existing IGA would need to be amended to detail the terms and conditions of the proposed partnership before the use of any CDBG-PRICE funds.

**CITY OF BOULDER**

\_\_\_\_\_  
City Manager

ATTEST:

\_\_\_\_\_  
City Clerk

APPROVED AS TO FORM:

\_\_\_\_\_  
City Attorney's Office

Routing  
for  
Signature.

Attachment D. Eligible Applicant Documentation

**Amended and Restated Intergovernmental Agreement  
Between Boulder County and the City of Boulder  
Concerning the Healthy and Resilient Mobile Homes Program**

This Amended and Restated Intergovernmental Agreement (this “Agreement”) is entered into by the Board of County Commissioners on behalf of the County of Boulder, a body corporate and politic of the State of Colorado (“Boulder County” or “County”), and the City of Boulder, a Colorado home rule municipality (the “City”). The County and the City may hereinafter be referred to individually as a “Party” or collectively as the “Parties.”

**RECITALS**

A. The Colorado Constitution Article XIV, Section 18(2)(a) and C.R.S. §29-1-201 *et seq* provide that political subdivisions of the State may contract with one another to provide any function, service, or facility lawfully authorized to each of the cooperating units.

B. The City and Boulder County are partnered in a multi-pronged manufactured housing wind damage assessment and efficiency performance program and entered into an Intergovernmental Agreement Concerning the Manufactured Housing Wind Damage Repair and Efficiency Upgrade Program on February 14, 2023 (“Original IGA”). This Agreement amends and restates the Original IGA in its entirety and expands the program to include wind damage repairs, resilience-focused upgrades, and emergency repairs (the “Programs”).

C. The Parties may engage in cost-sharing to fund implementation of the Programs. This Agreement memorializes each Party’s responsibilities with respect to the Programs.

**AGREEMENT**

In consideration of the covenants set forth herein and the mutual benefits to be derived by the Parties hereto, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties do hereby agree as follows:

**1. The Parties’ Obligations.** The Parties’ obligations under this Agreement are set forth in **Exhibit A**, Scope of Work, attached hereto and incorporated herein. Each Party shall report on the progress of the Programs on the first day of each quarter (January, April, July and October), using a mutually agreed upon format.

**2. Funding.** Each Party will bear the costs of performing its obligations under this Agreement except as specifically set forth in **Exhibit B**, Program Costs, attached hereto and incorporated herein, or as otherwise agreed to in writing by the Parties.

**3. Term of Agreement.** The term of this Agreement shall be as the date of its execution as set forth on the signature page attached to this Agreement. Subject to the annual appropriations, this Agreement shall remain in effect until the completion of the Programs, as indicated in Exhibit A, or October 30, 2027, whichever is sooner. Either Party may terminate this Agreement for any reason upon 30 days written notice to the other Party.

## Attachment D. Eligible Applicant Documentation

4. **Supersedes Prior Agreements.** This Agreement shall supersede and replace all prior agreements, promises, and understandings, oral or written, between the Parties regarding the subject matter herein.

5. **Modification.** This Agreement may be altered, amended, or repealed only on the mutual agreement of the Parties by a duly executed written instrument.

6. **Assignment.** This Agreement shall not be assigned or subcontracted by either Party without the express prior written consent of the other Party.

7. **Successors and Assigns.** This Agreement shall be binding upon the successors and assigns of the Parties.

8. **Choice of Laws.** The laws of the State of Colorado shall govern the interpretation and enforcement of this Agreement. Any litigation that may arise between the Parties involving the interpretation or enforcement of the terms of this Agreement shall be initiated and pursued by the Parties in the Boulder Courts of the 20<sup>th</sup> Judicial District of the State of Colorado and the applicable Colorado Appellate Courts.

9. **Waiver of Breach.** Any waiver of a breach of this Agreement shall not be held to be a waiver of any other or subsequent breach of this Agreement. All remedies afforded in this Agreement shall be taken and construed as cumulative, that is, in addition to every other remedy provided herein or by law.

10. **Integration.** This Agreement cancels and terminates, as of its effective date, all prior agreements between the Parties relating to the services covered by this Agreement, whether written, oral, or partly written and partly oral.

11. **Indemnification.** Neither Party indemnifies the other Party. The County and the City each assume responsibility for the actions and omissions of its own agents and employees in the performance or failure to perform work under this Agreement. It is agreed that such liability for actions or omissions of their own agents and employees is not intended to increase the amounts set forth in the Colorado Governmental Immunity Act, now existing, or as the same may be later amended. By agreeing to this provision, the Parties do not waive nor intend to waive the limitations on liability which are provided to the Parties under the Colorado Governmental Immunity Act § 24-10-101 et seq., C.R.S., as amended.

12. **Severability.** If any provision of this Agreement is found to be invalid, illegal, or unenforceable, the validity and enforceability of the remaining provisions shall not in any way be affected or impaired thereby.

13. **No Third-Party Beneficiaries.** The enforcement of the terms and conditions of this Agreement and all rights of action relating to such enforcement shall be strictly reserved to the Parties, and nothing contained in this Agreement shall give or allow any claim or right of action whatsoever by any other or third person. It is the express intent of the Parties to this Agreement

**Attachment D. Eligible Applicant Documentation**

that any person receiving services or benefits under this Agreement shall be deemed an incidental beneficiary only.

**14. Not Agent or Representative.** Neither Party is an agent or representative of the other Party and shall have no authority under this Agreement or otherwise to make representations or commitments, verbal or written, on behalf of the other Party without that Party's express prior consent.

**15. No Multiple-Fiscal Year Obligation.** To the extent any Party has financial obligations under this Agreement, those obligations are contingent upon appropriation, budgeting, and availability of specific funds to discharge those obligations. Nothing in this Agreement constitutes a debt, a direct or indirect multiple fiscal year financial obligation, a pledge of either Party's credit, or a payment guarantee by either Party to the other.

**16. Counterparts.** This Agreement may be executed by facsimile and in any number of counterparts, each of which shall be deemed an original instrument, but all of which together shall constitute but one and the same instrument.

**17. Notices.** All notices provided under this Agreement must be in writing and sent by Certified U.S. Mail (Return Receipt Requested), electronic mail, or hand-delivery to the other Party's authorized representatives as specified in Exhibit C. For certified mailings, notice periods will begin to run on the day after the postmarked date of mailing. For electronic mail or hand-delivery, notice periods will begin to run on the date of delivery.

[SIGNATURE PAGES TO FOLLOW]

Attachment D. Eligible Applicant Documentation

IN WITNESS WHEREOF, the Parties hereto have set their hands and seals this 12th day of December, 2023. The Parties to this Agreement have caused it to be executed by their authorized officers as of the day and year first above written. This Agreement may be executed in counterparts, each of which shall be original, but all of which together shall constitute a fully binding and executed Agreement.

BOULDER COUNTY

*Ashley Stolzmann*

Ashley Stolzmann, Vice Chair

~~Claire Levy, Chair~~ Excused  
Board of County Commissioners

Attest: *Cecilia Lacey* *CL*  
Clerk to the Board

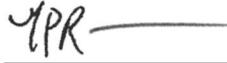
December 12, 2023  
Date



[Further signature page follows]

Attachment D. Eligible Applicant Documentation

THE CITY OF BOULDER



Nuria Rivera-Vandermyde, City Manager

ATTEST:



City Clerk

APPROVED AS TO FORM:



City Attorney

HUD PRICE NOFO

Proposal

Department of Housing and Human Services  
Boulder County, Colorado

**Attachment E. Evidence of Partnership Letter**

Boulder County  
P.O. Box 471  
Boulder, CO 80306

City of Boulder  
City Manager's Office  
Climate Initiatives Department  
1777 Broadway St.  
Boulder Colorado

Date: June 4, 2024

Re: Intent to Participate in Boulder County CDBG-PRICE Funds

This letter is to confirm the mutual intent of both Boulder County and City of Boulder to collaborate and enter into an intergovernmental agreement (IGA), contingent upon the award of funds from the United States Department of Housing and Urban Development for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out manufactured housing repair and rehabilitation activities as provided in the Boulder County CDBG-PRICE application.

The City of Boulder is a municipal government entity located in Boulder County, Colorado, a CDBG Entitlement Community, a member of the Boulder-Broomfield HOME Consortium and a member of the Boulder County Regional Housing Partnership. Under their jointly adopted comprehensive plan, the city shares in Boulder County's recognition of manufactured housing as an important housing option and its commitment to:

- Preserve existing manufactured home communities;
- Increase opportunities for resident owned communities; and
- Make every reasonable effort to address health and safety issues.

Under an existing IGA, City of Boulder administers an emergency and disaster repair program for manufactured housing called the Healthy and Resilient Mobile Homes Program. The manufactured housing repair and rehabilitation work proposed by Boulder County under the CDBG-PRICE application would expand this partnership.

This letter is an expression of our intent to partner with Boulder County. If Boulder County is funded for this work, the existing IGA would need to be amended to detail the terms and conditions of the proposed partnership before the use of any CDBG-PRICE funds.

**CITY OF BOULDER**

\_\_\_\_\_  
City Manager

ATTEST:

\_\_\_\_\_  
City Clerk

APPROVED AS TO FORM:

\_\_\_\_\_  
City Attorney's Office

Routing  
for  
Signature.