



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

May 5, 2017

Ms. Breanne Rothstein, City Planner
St. Anthony Village City Hall
3301 Silver Lake Road
St. Anthony, Minnesota 55418

Dear Ms. Rothstein,

All Parks Alliance for Change (APAC) is a homeowners' association that represents the residents of manufactured housing parks across the state of Minnesota and the region. APAC staff and resident leaders are very interested in working with you to improve the wellbeing of St. Anthony's Manufactured housing residents.

The Great Recession has set the stage for an affordable housing shortage in the Twin Cities metro area. Manufactured housing is an important source of unsubsidized affordable housing that we can no longer afford to ignore. This letter contains recommendations for how St. Anthony can utilize manufactured housing to reach its affordable housing goals set by the Metropolitan Council. Implementing these recommendations will boost your housing performance score, improve the wellbeing and opportunities of your low-income residents, and may allow you to obtain future funding opportunities from Metropolitan Council in accordance with the Livable Communities Act of 2011.

Although legal proceedings are still underway on the matter, the possible closure of Lowry Grove would reduce the affordable housing available in the City. If the community does close, the least that the City could do for these residents is to help them move to a fee-simple lot within the City, so that they do not lose access to the local school district and other valuable local resources, in addition to losing their home, community, and neighborhood. We hope that the City does not ignore the needs of its residents and opportunities to help them.

A key question for St. Anthony is how it can improve its standing towards affordable housing if there is a loss of approximately 104 units of affordable housing due to the potential closure of Lowry Grove, one of its main sources of affordable housing. This park community provides housing equal to one third of the goal of 312 affordable units set for St. Anthony by the Metropolitan Council.

The planned redevelopment of the park appears unlikely to boost the City's affordable housing units. Some of the residents who could be forced to move bought their homes in Lowry Grove recently, and were not told that the park was headed for closure before signing. These individuals invested in their homes in good faith even while the owners knew that selling the park would result in its closure and redevelopment as a non-manufactured housing site, and made no mention of this fact. Although the lack of transparency around the sale may have been legal, as a "black letter" legal matter, it nonetheless has placed undue hardship upon those residents who bought homes in good faith, believing that they were settling down for the long-term.



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We recommend that the City takes steps above and beyond the minimum requirements of the law to support these residents and to ensure that whatever outcome is decided in court is accompanied by measures to respect these residents, foster their smooth transition to new homes as necessary, and to reduce the immediate personal and financial burdens they face related to being forced to leave their community.

We note that St. Anthony's Comprehensive Plan does not lay out detailed plans to improve its affordable housing rate or improve its standing towards its manufactured housing residents. Therefore, in addition to the information about manufactured housing in St. Anthony that is provided within this packet, we have provided specific policy recommendations. These include the following suggestions:

1. Use manufactured housing to address affordability without new large-scale multifamily construction;
2. Change ordinances to allow manufactured homes to be sited in residential districts outside existing parks;
3. Improve your City's level of affordable housing by reducing loan barriers to move residents into currently available manufactured housing units;
4. Generate funding opportunities for repair and maintenance, and set standards for infrastructure in manufactured housing parks;
5. Encourage resident purchase of communities through local tax incentives and first refusal rights;
6. Promote manufactured housing within your comprehensive plan and other city outlets as a primary unsubsidized affordable homeownership option for low-income working residents; and
7. Actively reduce stigma against manufactured housing.

The city snapshot, policy recommendations, SWOT analysis, and statewide statistics contained in this packet are guiding documents to assist you in your comprehensive planning process. We invite you to use us as a resource as you update your City's Comprehensive Plan and develop strategies around affordable and manufactured housing.

APAC has a unique 35-year focus on manufactured housing policy, research, and analysis. Our organization occupies a central role in sharing information about this unique form of housing, and can also help you reach park residents to advance your programming and policies. We are very interested in discussing the contents of this packet and will contact you in the near future to set up a meeting. Please do not hesitate to contact us with any questions or concerns.

Sincerely,

Owen Hawkins
Program Associate

Dave Anderson
Executive Director



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Snapshot of Manufactured Housing in St. Anthony, Minnesota

St. Anthony's 2018 comprehensive plan update presents many opportunities to improve strategies that preserve and expand affordable housing. Developing innovative methods to reach that goal can boost your City's housing performance score, potentially allowing St. Anthony to obtain funding from the Metropolitan Council.

Manufactured housing is affordable housing

The fair market rent for a two bedroom in the Twin Cities Metro Area is \$1,027. **Around Lowry Grove, St. Anthony's only manufactured home park, the small area fair market rent is as high as \$980, more than double the lot rent of a manufactured home.**

Fair Market Rents compared to Manufactured Home Lot Rent in St. Anthony

	Efficiency	1 Bedroom	2 Bedroom
Small Area FMR 55418	\$630	\$780	\$980
Twin Cities FMR	\$656	\$813	\$1,027
Manufactured Home Lot Rent	-	-	\$410

Source: HUD, 2016¹

The average lot rent for a manufactured home in St. Anthony is \$410, or less than half of the Fair Market Rent in St. Anthony, which confirms the affordability of manufactured housing and positions it as a unique and valuable resource for cities interested in improving the affordable housing they offer residents.

St. Anthony Manufactured Housing

	Lowry Grove
Total Lots	104
Vacant Lots	4
Vacant Homes	0
Population	215
Average Lot Rent	\$410

Source: APAC 2017²

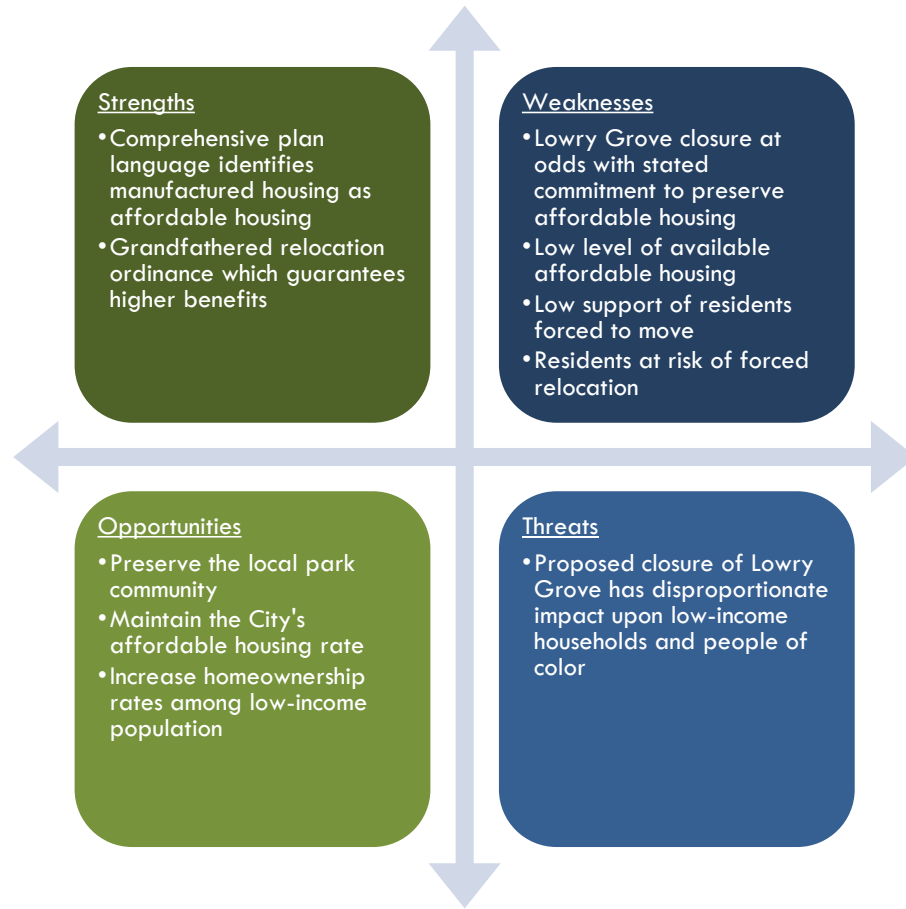
Why preserve and support manufactured housing in St. Anthony?

Approximately 215 people currently live in manufactured housing in St. Anthony, making it a significant source of affordable living for the City's residents. In addition to providing unsubsidized affordable units for residents, manufactured housing helps St. Anthony meet its goals of providing lifecycle housing options and encouraging homeownership. People living in manufactured housing in the Twin Cities are generally more diverse and have lower incomes than the general population.



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SWOT Analysis

This analysis of strengths, weaknesses, opportunities, and threats (SWOT) presents the current state of policymaking in your community related to manufactured housing and drives the policy suggestions that are listed on the first page of this letter and detailed in the Guide to Manufactured Housing Best Practices below. This analysis suggests that St. Anthony has made some important progress in some areas with this resident group, but also that it has ample room to improve in caring for its manufactured housing residents.

Assuming that Lowry Grove remains a manufactured housing community pending litigation, St. Anthony will have the opportunity to provide low-income homeownership to its residents by increasing investment in the infrastructure and maintenance of its manufactured housing park. The City could also set standards for the infrastructure and design of manufactured housing to ensure quality, and to preserve manufactured housing as an appealing resource in the community.



Guide to Manufactured Housing Best Practices

The bottom line is that manufactured housing creates opportunities for unsubsidized, affordable, first-time homeownership for individuals who would otherwise never be able to own a home. The pressure that the Great Recession has placed on local economies has generated considerable burdens upon both government resources and low-income populations, pointing to the need to identify and leverage the underutilized value of manufactured housing in your City's housing implementation strategies and comprehensive plan language.

The following sections describe key areas to consider regarding the successful use of manufactured housing as a means of meeting your City's affordable housing needs. These are areas that your City's Comprehensive Plan should clearly identify and describe. Some basic alterations to policies can ensure that manufactured housing remains a safe, long-term, cost-efficient, and affordable housing option for your City's residents.

1. Use manufactured housing to address affordability without new large-scale multifamily construction

High-density housing is considered ideal for developing affordable housing because connecting developments to utility infrastructures is less costly than it is in low-density areas. According to CFED, manufactured housing is "Produced in one-fifth the time and at half the cost of site-built homes, manufactured housing assembled in a controlled, factory environment uses fewer materials and generates 35%-40% less waste than comparable site-built units."³ New Energy Star manufactured housing is capable of blending in with other types of housing, has higher energy-efficiency levels than site-build housing, and is much more time and cost-efficient to build:

on a per dwelling unit (DU) basis, manufactured homes have significantly lower environmental impacts and are more sustainable across a range of key sustainability indicators than either single family homes or the condominium/town home units. Apartments have lower impacts in many areas due to their small size and density; however, they are not as affordable and do not provide home ownership benefits. While these benefits will vary by location, community age, density and other factors, this case study is representative of the types of benefits manufactured homes provide.⁴

These qualities suggest that manufactured housing provides a valuable tool to meet the affordable housing needs of your community, and has the potential to boost the sustainability of your community through investment in Energy Star homes and retrofits.

Often, in suburban cities, high-density areas available for affordable housing development are scarce, which hinders a city's ability to easily generate new cost-effective affordable housing. Because input time, waste, and costs are lower for manufactured housing, it presents a way to get around this barrier, and is positioned to improve affordable housing rates and raise densities outside of the City's center. As the Metropolitan Council suggests,

Manufactured home parks help ameliorate the shortage of housing affordable to low- and extremely low-income residents and do so without public subsidies. [Our data] shows that compared to the region's share of housing units that are affordable to people who make 30%



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and 50% of Area Median Income, a much higher portion of the manufactured housing units are affordable to residents in these income levels. Manufactured home parks are distinctive as a housing option for many economically disadvantaged residents.⁵

Supporting existing manufactured housing to generate cost-effective, mid-range density affordable housing can help address problems associated with finding enough scarce high-density land to support it. Doing so would also align with NIMBY (“not-in-my-backyard”) positions that insist that low-income housing should be spread out, and not be concentrated in the center of the city, which lower input costs associated with high-density areas incentivize. Investing in manufactured housing can reduce the concentration of affordable housing in the city center and can alleviate pressures created by not being able to find high-density areas that are readily available for new affordable housing development.

2. Change ordinances to allow manufactured homes to be sited in residential districts outside existing parks

Altering ordinances to allow manufactured homes to be sited on fee-simple lots in residential districts outside parks is a common practice in Greater Minnesota. Research shows that manufactured and site built homes share the same levels of durability, longevity, craftsmanship, and aesthetic quality, while manufactured housing allows for substantial savings on time, waste, and input costs.⁶

Modern manufactured homes blend into surrounding neighborhoods, and if managed properly, do not lower surrounding property values or raise crime rates more than other types of housing. Concentrated poverty and poor management practices, not simply the presence of low-income housing, have been identified as problems that can destabilize communities. A 2010 University of Chicago academic article suggests that manufactured housing is not more likely to contribute to crime than other forms of housing.⁷ A Thrive MSP report also refutes the myth that affordable housing contributes to either higher rates of crime or lower property values.⁸

These points suggest that the City of St. Anthony and its residents seriously consider the evidence when making negative claims about the value of manufactured housing and affordable housing, and that a more nuanced perspective would identify well-managed manufactured home parks as a valuable resource to the community. Ordinances that allow individual manufactured homes to be sited outside of home parks would allow residents to purchase land underneath their homes, allowing them to become more invested in successfully managing their own property while also boosting the affordable housing rate.

3. Improve your City’s level of affordable housing by reducing loan barriers to move residents into currently available manufactured housing units

St. Anthony can expand its affordable housing without building new units. Within Lowry Grove, there is room for more affordable living options. The table above (see Page 3) **shows a total of 4 vacant lots—a total of 4 currently available affordable living sites in St. Anthony’s manufactured housing supply.** These vacancies exist as easy opportunities that the City can use to improve its supply of affordable housing. Enabling interested potential residents to move into these units can help the City capitalize on a substantial set of unused resources, making them work



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for its bottom line as well as for the overall wellbeing of the community and low income individuals. The Metropolitan Council states,

unused manufactured home park capacity presents an opportunity for the region to expand its affordable housing stock. If all of the empty pads had a double-wide home placed on them and a family moved into each unoccupied home, the region could provide affordable housing to 1,164 additional families. If each empty pad had a single-wide home on it and a family rented or owned all of the unoccupied homes, this would mean 1,868 more affordable homes in the region. To put this number in context, in 2014, the region added 777 units that were affordable to households who made 60% or less than the Area Median Income.⁹

Helping reduce financial barriers faced by these individuals, such as making quality loans easier to obtain, can decrease vacancy rates and increase your City's affordable housing level. Although sales have dropped since the Great Recession, this does not reflect a reduced demand for manufactured housing:

“While demand for affordable housing remains high, the tightened credit market has devastated the industry,” said Fridley Mayor Scott Lund, who sells manufactured homes and owns a manufactured-home community ... “the tightening of the financial market has caused less people to get loans to purchase manufactured homes.”¹⁰

In Minnesota, manufactured homes are still considered private instead of real property, which places substantial disadvantages upon residents who are seeking loans to purchase them.¹¹ Chattel loans provide fewer consumer protections, for example, and have much higher interest rates.¹² Given that demand is still high for manufactured homes, programs should be established that are specifically tailored to help potential manufactured housing residents obtain loans to fill vacancies and reduce consumer protection problems. Partnerships with local banks and loan providers could help accomplish this goal.

4. Generate funding opportunities for repair and maintenance, and set standards for infrastructure in manufactured housing parks

Support the repair and replacement of pre-1976 homes with energy efficient homes in rehabilitation and weatherization programs, matched savings programs (Assets for Independence) and energy subsidy programs (Low Income Housing Energy Assistance Program). Allow infrastructure improvements for a manufactured home park where at least 51 percent of the residents are low or moderate-income persons eligible for CDBG funding.¹³ Obtaining CDBG funding for this purpose can help to finance improvements of park infrastructure.

New manufactured housing is energy efficient, making it ideal for communities attempting to generate sustainable low-income housing: “Compared to a typical HUD Code manufactured home, an Energy Star qualified manufactured home can save homeowners from \$190 to \$246 a year in average energy costs, or 24% to 29% of total heating and cooling costs.”¹⁴ Numerous options to improve the energy efficiency of older manufactured homes are also available.¹⁵

As energy-efficient affordable housing is becoming more popular due to falling costs of solar and other “green” technologies, manufactured housing has emerged as a particularly useful way to implement them. The input costs of green technologies in manufactured housing parks can be far



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lower than site-built housing and may also present additional qualities that make it highly advantageous to support emerging green technologies. For example, manufactured housing parks probably catch more sunlight than areas with more variety in building height, giving them a competitive advantage when it comes to installing solar panels on roofs, which could then be networked together to sell energy back to the grid.

Standards should be set for manufactured home parks' physical plant, including roads, water supply, trash disposal, lighting, pest control, electrical service, and sewer systems. Historically, guidelines have not been in place to preserve manufactured housing, which enables critics to cite decrepit infrastructure as an argument against manufactured housing overall. This argument is unfair, and does not take into consideration that park residents have traditionally faced scorn from city governments and local residents, in addition to poor management, all factors which have reduced their ability to obtain political and financial support to make these improvements in the first place. Manufactured housing residents may possess little capacity to make such widespread improvements without substantial support. If infrastructures are well managed in manufactured housing communities, there is no reason that high levels of quality, safety, and physical appeal cannot be attained.

5. Encourage resident purchase of communities through local tax incentives and first refusal rights

The creation of resident-owned communities can improve manufactured housing parks as an affordable housing option. There are currently seven resident-owned park cooperatives in Minnesota, and many more nationwide.¹⁶ Residents may form a cooperative that gives them management responsibilities, which has the potential to greatly reduce tensions between residents and management, a common problem that exists in many parks. Owning land under their homes presents a variety of potential benefits to residents, who have more opportunities to make changes and preserve parks in ways that they see fit. The City of St. Anthony could support resident ownership of its park as a way of improving resident investment and accountability.

Cooperatives have the potential to improve public safety, investment in infrastructures, park attractiveness, and the upward economic mobility of residents as the collective works to address its own immediate needs instead of depending on a manager or owner to handle them. Because residents have a unique sense of buy-in and responsibility to their neighborhood and community as part of a cooperative, they are often able to avoid problems commonly faced by parks with a more traditional governance structure. Providing tax incentives to make it easier for residents to purchase their parks could greatly enhance manufactured housing as a resource in your community. For example:

- CDBG funding can help residents to finance the purchase of a park.
- A city or a community development housing organization (CDHO) can apply for the 15 percent of a HOME allocation that is exclusively available to CHDOs and the additional 5 percent of the HOME allocation that may be used for capacity-building activities of CHDOs.
- Waive or reduce transfer taxes when a park owner sells the property to the residents.



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- Waive or reduce business licensing fees for resident-owned communities.
- Forgive tax liens or liens for municipal services on a resident-owned community that were imposed when the property was owned by an investor owner.

Related to the creation of resident-owned communities is the use of rights of first refusal provided under state law that enables residents to purchase a park upon notice of closing, as long as they can meet the standing offer. Extending time limits to enact these rights would give park residents an additional means of preserving affordable housing rates in the community, and ultimately reduce the financial and emotional stresses associated with being forced to move. Rights of first refusal could be enhanced with a local ordinance that provides an extension of time to submit corresponding paperwork upon any zoning change, as in Stacy, Minnesota:

§ 114.09 EXTENSION OF PERIOD OF RESIDENTS' RIGHT TO PURCHASE

Before the execution of an agreement to purchase a manufactured home park, the purchaser must notify the park owner, in writing, if the purchaser intends to close the manufactured home park or convert it to another use within 1 year of the execution of the agreement. The park owner shall provide a resident of each manufactured home with a 180-day written notice of the purchaser's intent to close the park or convert it to another use. During this 180-day notice period, owners of at least 51% of the manufactured homes in the park, or a nonprofit organization which has the written permission of the owners of at least 51% of the manufactured homes in the park to represent them in the acquisition of the park, shall have all rights to purchase the park as afforded under M.S. § 327C.095, Subd. 6.

(Ord. 2007-7-1, passed 7-17-2007)¹⁷

6. Promote manufactured housing within your comprehensive plan and other city outlets as a primary unsubsidized affordable homeownership option for low-income working residents

Manufactured housing is a substantial source of resident-owned affordable housing. Resident-ownership is a valuable way of building assets in low-income communities. It allows for ownership and investment in property that can be sold at a later date for profit, and provides resident-owners with a sense of responsibility to their neighborhood, fostering higher investment in upkeep, maintenance, and public safety. Most residents of manufactured homes own them, which is a valuable characteristic that no other type of housing can match:

Manufactured housing units also offer homeownership opportunities to families for whom ownership is otherwise difficult or not possible. In fact, the homeownership rate among manufactured home residents (90%) is higher than the rate for the residents who live in other types of homes (74%).⁹ Moreover, as Figure 3 shows, manufactured units house families at costs that are much lower than other types of housing with median monthly housing costs for manufactured home owners only 55% of the median monthly housing costs of homeowners in the region.¹⁸

Because resident-owners typically stay in place for a longer period of time, their presence increases the stability of communities, and because they have devoted a higher level of



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investment in their homes, they are more incentivized to care for their community and to be interested in the safety and wellbeing of their peers. This increases levels of social-capital and buy-in among members of a community, which are critical factors that contribute to building economic mobility through asset development and maintaining successful neighborhoods:

Home equity is a major source of personal wealth in the United States. It comprises roughly one-third (31.8%) of net worth for American households. Home equity plays an even more important role for low- and middle-income families, accounting for approximately half of the net worth of families in the bottom 60% of the income distribution in 2007.¹⁹

Manufactured housing is workforce housing. Connecting low-income working individuals in St. Anthony to adequate transportation and housing can facilitate their upward mobility instead of pushing them back into poverty. Due to the economic “multiplier effect,” this is in the best interest of all businesses in the community because greater numbers of individuals have the opportunity to purchase their goods and services, as well as work for them.

7. Actively reduce stigma against manufactured housing

The more that low-income individuals are denied opportunities to fully participate in the workplace or to secure essential needs such as housing, the more likely they are to resort to socially-destabilizing behavior, such as property crime to compensate for immediate financial needs, or to alcohol consumption and substance abuse as “self-medication” for trauma and stress when these needs are not met. These patterns of behavior can impose far-reaching destabilizing effects upon entire communities, and pose threats to the wellbeing of the community as a whole, not just its low income individuals. Supporting ordinances, rhetoric, policies, and institutional practices that undermine and withhold value from low-income populations is not in the best interest of your community overall, and these approaches are not a sustainable or cost-efficient use of public taxpayer revenue.

Creating programs and funds that train individuals to better care for their homes by teaching them skills that they can use into the future would be a more effective use of your City’s time and money than policies that seek to regulate behavior through punishment, and would build these communities up to be better participants in the City overall, instead of continuing the legacy of destabilization that has traditionally and consistently denied wellbeing to low-income individuals in manufactured home parks.

One of the common stigmas that park residents face is that their mode of housing is associated in public discourse with transience, irresponsibility, and disrepair. We do not call manufactured home parks “trailer parks” anymore, not only because of the unfortunate association of the term “trailer trash” and its negative connotations, but also because the term “trailer” no longer represents the actual use of most manufactured homes, which most often stay in place for their entire lifetimes. The idea that manufactured homes are easily moved contributes to a lack of public awareness of the problems that residents face when they are forced to move due to a park closure or change of use, and translates into additional burdens placed on the residents by outsiders who assume that moving should be no problem for them. The term “mobile home” is outdated for the same reason:



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Although most "mobile" homes are never moved and new manufactured home placements are increasingly titled as real estate rather than personal property, we estimate that nearly two-thirds of them – most of which are located in land-lease communities – are still titled like automobiles rather than as real estate. Titling manufactured homes as personal property increases homeowners' difficulty in obtaining mortgage financing. With personal loans instead of mortgages, these owners lose out on many of the consumer protections afforded to buyers of site-built homes.²⁰

Many residents of manufactured housing parks are disabled, elderly, minorities, and/or veterans, which means that when a city or community acts in discriminatory ways against park residents, it is adding increased burdens upon already heavily stigmatized and disadvantaged populations. According to the Metropolitan Council's recent report, "In manufactured home parks, 44% of residents live in households with incomes at or below 185% of federal poverty level, compared to 22% of all residents in the region. The parks are also an important source of housing for the region's residents with disabilities: 14% of the park residents have disabilities compared to 9% of the residents of the region."²¹

A study by the Consumer Financial Protection Bureau' states that its "findings underscore the importance of the manufactured housing sector as a source of affordable housing for some consumers, including those outside of metropolitan areas, older households, and lower-income households. At the same time, these same groups include consumers that may be considered more financially vulnerable and, thus, may particularly stand to benefit from strong consumer protections."²² Developing a plan to educate your community on these issues can help dispel the myths associated with manufactured housing.

Research suggests that a primary reason that affordable and manufactured housing has so much stigma attached to it is that it has been poorly managed, not simply because low-income residents necessarily cause trouble or reduce property values in surrounding neighborhoods. One study suggests, "well-designed and well maintained or managed manufactured houses would not negatively impact adjacent properties."²³ In addition, well-managed manufactured housing is unlikely to cause higher crime rates in surrounding areas.²⁴ The Metropolitan Council has also attempted to dispel fears related to affordable housing in a recent publication, suggesting, "The design, management, and maintenance of any residential property determine whether or not it is a detriment or asset to its neighbors, regardless of the income of its inhabitants."²⁵ These points suggest that supporting manufactured housing in your communities can create substantial value, regardless of stigma against it.

We recommend that your City adopt new approaches towards manufactured housing populations that ultimately help residents foster healthier behavior and build strong, sustainable communities. Recognizing that the whole community stands to benefit from improving the stability of its most vulnerable members can help overcome political pressures that stigmatize the poor and disadvantaged. Discriminatory policies self-reinforce the stigma that they are founded upon, and their supporters often fail to recognize that such policies have largely been responsible for the undesirable outcomes they seek to punish. Instead of fostering dysfunction in low-income communities by withholding resources from them, it is in the long-term best interest of cities, planners, and communities overall to facilitate community-level supports and services for manufactured housing park residents, investment in and rehabilitation of park infrastructures, and to reduce and rescind overly-disruptive policies that destabilize their wellbeing.



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Resources

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- ¹⁵ Energy.Gov. Energy-Efficient Manufactured Homes. Found at Website: <http://energy.gov/energysaver/energy-efficient-manufactured-homes>
- ¹⁶ North County Cooperative Foundation. 2015. Found at Website: <http://northcountryfoundation.org/impact/>
- ¹⁷ City of Stacy, Minnesota. 2007. Code of Ordinances. Found at Website: [http://library.amlegal.com/nxt/gateway.dll/Minnesota/stacy_mn/cityofstacyminnesotacodeofordinances?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:stacy_mn](http://library.amlegal.com/nxt/gateway.dll/Minnesota/stacy_mn/cityofstacyminnesotacodeofordinances?f=templates$fn=default.htm$3.0$vid=amlegal:stacy_mn)



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