



# All Parks Alliance for Change ■ APAC

*An Organization of Manufactured Home Park Residents*

November 30, 2018

City Planner  
Hugo City Hall  
14669 Fitzgerald Avenue North  
Hugo, Minnesota 55038

Dear City Planner:

We are writing to follow up on our first letter, dated March 2, 2018, which discussed manufactured housing and Hugo's 2018 Comprehensive Plan update.

## **Manufactured Housing Language in Hugo's 2040 Comprehensive Plan Draft**

To help you complete your draft, we created the following schema for evaluating Comprehensive Plan language as it relates to manufactured housing.

**Negative** – Mention of manufactured housing in the Comprehensive Plan draft is negative, whether furthering stigma, calling for closure, or describing plans for redevelopment, zoning, or land use changes that reduce protection of manufactured housing communities.

**No obvious examples in draft.**

**Invisible** – Little or no mention of manufactured housing or relevant data exists in the Comprehensive Plan draft, or clear opportunities to provide meaningful data on manufactured housing are present but not acted upon. Similar to the category, "Purely Descriptive," described below, the category, "Invisible" applies to Comprehensive Plans that fail to substantially engage with strategies that support a city's manufactured housing. Engaging with and supporting all residents ensures that the entire community is strengthened in the long-run.

**Manufactured housing is mentioned in draft.**

**Purely Descriptive** – Mention of manufactured housing is limited to statistics related to how much manufactured housing exists in the city, or other basic facts without discussion of improvement. The Comprehensive Plan draft provides an important opportunity for describing methods of supporting manufactured housing in the City as an unsubsidized and primarily owner-occupied affordable housing resource, and an important source of affordable housing in Hugo. The City can go further in describing tangible support strategies for these communities.

### **Examples of Purely Descriptive Language from Hugo's 2040 Comprehensive Plan Draft:**

"There is one manufactured housing park located in the City along the east side of Highway 61 on the north end of downtown. There are approximately 105 manufactured homes within the park" (34).

See Table 2-6 on Page 34.

"Water used by multifamily dwellings, apartment buildings, senior housing complexes, and mobile home parks should be reported as Residential Water Use" (48).



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“Residential Water Use - Water used for normal household purposes such as drinking, food preparation, bathing, washing clothes and dishes, flushing toilets, and watering lawns and gardens. Should include all water delivered to single family private residences, multi-family dwellings, apartment buildings, senior housing complexes, mobile home parks, etc” (49).

**Identifies manufactured housing as affordable housing** – Comprehensive Plan language clearly states that manufactured housing provides affordable housing in the City.

**Example of language identifying manufactured housing as affordable from Hugo’s 2040 Comprehensive Plan Draft:**

None

**Identifies clear strategies to support manufactured housing** – Comprehensive Plan language describes tangible methods to improve manufactured housing.

**Example of a clear strategy to support manufactured housing from Hugo’s 2040 Comprehensive Plan Draft:**

“Residential The existing land use plan identifies the following four residential land uses categories: Single-family (Detached), Single-family (Attached), Multi-Family housing and Manufactured Housing Park ... The Manufactured Housing Park designation includes areas where multiple manufactured housing structures are grouped together” (34).

**Identifies funding sources to support manufactured housing** – Comprehensive Plan language describes funding sources that can be used to improve manufactured housing.

**Examples of funding sources to support manufactured housing from Hugo’s 2040 Comprehensive Plan Draft:**

None

**Connects improvement strategies to funding** – Comprehensive Plan language describes both clear strategies to improve manufactured housing and identifies funding sources that can be applied towards them.

**Examples connecting strategies to funding from Hugo’s 2040 Comprehensive Plan Draft:**

None

Hugo’s 2040 Comprehensive Plan draft could clearly **identify manufactured housing as affordable housing, identify clear strategies to support manufactured housing, identify funding sources to support manufactured housing, and connect improvement strategies to funding.** Hugo can improve its language towards manufactured housing across all of the categories described above, so that the draft’s treatment of manufactured housing moves further away from being invisible or purely descriptive.

If your City has additional ways that it supports manufactured housing that are not clearly mentioned, we encourage you to address them explicitly in your updated Comprehensive Plan draft.



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Based on our analysis, we would like to make the following specific recommendations:

- Create, describe, and maintain a policy of at least a one to one ratio replacement of affordable housing units if any are removed from the City's housing stock.
- Fill vacancies in manufactured home communities.
- Create additional protective land use and zoning designations for manufactured home communities.
- Incentivize the current owners of manufactured home communities to sell to residents by creating incentives to do so, which could include forgiving back-taxes, utilities, or providing tax breaks if it is sold to a non-profit with the intention of creating a resident-owned community. Creation of a resident ownership-structure can help reduce tensions between residents and management, provide incentives for residents to get even more involved in supporting the well-being of their community, and ensure that manufactured housing communities remain a valuable affordable housing resource.

In general, it would help to reflect on the following key points regarding the value of manufactured housing and to address them in your updated comprehensive plan language:

- Manufactured housing is unsubsidized affordable housing.
- Manufactured housing provides more affordable housing in Minnesota than any other form of affordable housing.
- Manufactured housing is valuable to local businesses because it provides workforce housing.
- Manufactured housing provides owner-occupied housing.
- Manufactured housing provides housing to seniors, youth, and low-income individuals, enabling them to stay in a neighborhood and community they value.
- Modern construction of manufactured housing is more cost-effective, generates less waste, is more energy efficient, and more timely than site-built housing.
- Manufactured housing communities are more stable than terms like "mobile homes" or "trailers" suggest, and homes often stay in place and are used like any other type of residence for many years.
- Many issues can be resolved through the creation of a resident-owned community, which incentivizes residents to invest in their park.

We encourage you use the 2018 update process as an opportunity to incorporate positive language towards manufactured housing into your City's 2040 Comprehensive Plan. Doing so does not need to be overly complicated. Start by identifying manufactured housing as an affordable housing resource, describe tangible ways that it can be improved, and identify funding opportunities that support these methods.



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We encourage you to contact us when you are working on issues related to manufactured housing. We can help you engage with residents and resolve problems with satisfactory outcomes for all parties. Thank you.

Sincerely,

Owen Hawkins  
Program Associate

Dave Anderson  
Executive Director