



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

November 30, 2018

City Planner
Shoreview City Hall
4600 Victoria Street North
Shoreview, Minnesota 55126

Dear City Planner:

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

Manufactured Housing Language in Shoreview'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 Shoreview. The City can go further in describing tangible support strategies for these communities.

Examples of Purely Descriptive Language from Shoreview's 2040 Comprehensive Plan Draft:

"Other residential land uses include single-family attached residential, multi-family residential, and manufactured housing community" (4-22).

"Other housing options including townhomes, condominiums, apartments and a manufactured home community ... However, the percentage of manufactured homes is slightly higher than the metropolitan area" (7-143).



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“Manufactured Housing There is one manufactured housing park in the City that was established in 1976 and has 215 housing units. A Special Use Permit was granted for this park in 1975 that addressed the overall development, including lot layout, road access, sewer and water infrastructure and common facilities. Ramsey County has also issued a license for the park and it is subject to the County and State regulations in addition to the City’s” (7-158).

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 Shoreview’s 2040 Comprehensive Plan Draft:

“These affordable homes include manufactured housing units and apartments units in addition to the townhomes and single-family homes that make up the majority of the City’s housing stock. Recognizing this, the City has taken steps to help lower-income homeowners repair and renovate their homes so they can continue to live in them affordably by establishing a home improvement loan program and partnership with non-profit housing organizations. There are several ways in which the City can build upon this foundation to further support the preservation of non-subsidized, “naturally occurring” affordable housing. Recommendations included providing financial assistance, property acquisition, relocation assistance, eviction protections, tax incentives and zoning” (7-159, 160).

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 Shoreview’s 2040 Comprehensive Plan Draft:

“RM, Medium-Density Residential. This category identifies those areas designated for continued or future use as townhomes, double dwellings, quad-homes, manufactured homes, small-lot single-family dwellings, or similar housing styles ... Corresponding zoning districts: R-2, Attached Residential; R-4, Manufactured Home Residential District; and PUD, Planned Unit Development” (4-25).

“1. Brookside Manufactured Home Park This PDA consists of a manufactured home park located on County Road J and the single-family residence at 1586 County Road J which is surrounded by the manufactured home park. This site may be desirable for redevelopment due to its proximity to the nearby Rice Creek Corporate Park, County Road J/Interstate 35W interchange, Rice Creek North Regional Trail and the Medtronic development in Mounds View. The location of this property on an arterial and near existing industrial, commercial and residential development make it suitable for Medium- and High-density residential land uses and mixed use development. Policies The future land use designations for this PDA are RM, Medium-Density Residential; RH, High-Density Residential; and MU, Mixed Use. The RM designation is intended to convey that the manufactured home park remains an appropriate use of the land and that the City does not wish to initiate redevelopment activity on the site or to make it a legal nonconforming use. If, however, redevelopment occurs in the future, mixed use, high-density or another form of Medium-Density residential may be acceptable. The detached single-family residence (1586 County Road J) is isolated from other uses because of its location and



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proximity to the Brookside community. Future plans for this PDA must integrate this property into the use of the larger parcel. Redevelopment of the site shall adhere to the following policies: A. Any land use change of this site from the manufactured home park to another use must include the entire manufactured home park and the single-family residence at 1586 County Road J. B. Any change in the use of the single-family property, unless incorporated into the existing manufactured home park, must occur with redevelopment of the manufactured home park. C. The number of direct access points to County Road J shall be minimized. D. Trail connections providing access to the Rice Creek North Regional Trail Corridor shall be provided as part of the redevelopment plan. E. Redevelopment of the site must expand housing opportunities and choices within the community. F. Redevelopment of this site must provide affordable and workforce housing that results in a no-net loss of affordable units. G. A mixed use development consisting of residential, office and commercial is suitable for this property provided residential is the primary land use. Vertical mixed use is preferred. Office and commercial uses shall: Be oriented towards County Road J and Lexington Avenue Visually integrated into the development Include smaller scale uses that serve the nearby residential neighborhoods Provide buffer between the roadways and residential uses. Automobile related uses, such as a fuel station, convenience store, auto-repair shop, automotive sales are not suitable for this property (4-39, 41).”

“Since this park was established over 40 years ago, the City is concerned about the age of the housing units and infrastructure, including common facilities and the neighborhood quality. While the City is not aware of any significant issues or deficiencies in the park, proactive measures should be taken to ensure the housing in this neighborhood continues to meet the resident needs” (7-158).

“Facilitate discussion with the manufactured housing park owner and park residents to identify community and housing needs. Explore potential resources that may provide assistance where needed” (7-160).

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 Shoreview’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 Shoreview’s 2040 Comprehensive Plan Draft:

None

Shoreview’s 2040 Comprehensive Plan draft could more clearly **identify manufactured housing as affordable housing, identify additional strategies to support manufactured housing, identify funding sources to support manufactured housing, and connect improvement strategies to funding.** Shoreview can improve its language towards manufactured housing across



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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.

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 housing communities.
- Create additional protective land use and zoning designations for manufactured home communities.
- Incentivize the current owners of manufactured housing 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



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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.

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