

Mobile and Manufactured Home Park Preservation Policy
City of Spokane Comprehensive Plan Text Amendment

File Z1400065COMP

ORD C35310

Combined Substantive Public Comments Received

to Date as of November 16, 2015

ORD C35310 (Z1400065COMP) – MHP Preservation Comprehensive Plan Amendment Application

Summary of Public Comment Received – Arranged by Date Received

Viewing Full Public Comment Below or Online

Full public comment is public record and a part of the official file. The comments received follow this summary or may be viewed online under “related documents” at the application webpage:

<http://my.spokanecity.org/projects/policy-re-manufactured-and-mobile-home-parks/>

Comment Summary and Explanation of Response

Twenty-nine comments were generally supportive of the comprehensive plan amendment proposal, while 181 comments were generally opposed. Several comments were neutral. Some individuals submitted more than one comment. The Plan Commission and staff responded to the comments by convening a stakeholder group to share information about the proposed policy and develop alternative language. Participating Plan Commission members formed a subcommittee to study alternatives and ultimately the Plan Commission recommended denial of the application, and further recommended a Plan Commission housing review for the upcoming 2016 work program.

Below is a list of comments received and a summary for each:

Date Rec'd	Comment From	General
4/3/2015	Cochran, Robert	Oppose
4/6/2015	Cochran, Robert	Informational
4/6/2015	White, Judith	Support
4/7/2015	Chapman, Randy	Informational
4/8/2015	Cochran, Robert	Informational
4/9/2015	Chapman, Randy	Informational
4/9/2015	Chapman, Randy	Informational
4/14/2015	Chapman, Randy	Informational
4/14/2015	Chapman, Randy	Informational
4/15/2015	Kendrick, Frances	Support
4/15/2015	Morin, Janet	Support
4/15/2015	Smith, Allison	Support
4/15/2015	Mansfield, Jere	Support
4/26/2015	Gerber, Sanford	Support
4/30/2015	Whittekend, Pam	Support
4/30/2015	Roberts, Cheryl	Support
5/6/2015	Jessup, Sue	Support
5/6/2015	Mason, Vicki	Support
5/6/2015	Toone, Janet	Support
5/10/2015	Doyle, Sharon	Support
5/11/2015	Walters, Winnifred	Support
5/11/2015	Suhr, Adolph	Support
5/12/2015	Marlowe, William	Support
5/13/2015	Spencer, Ken	Oppose
5/13/2015	Bailey, Brenda	Support
5/14/2015	Chapman, Randy	Support
5/14/2015	Cochran, Robert	Oppose
5/14/2015	Doyle, Carolyn	Support
5/14/2015	Stolz, Brian	Support

Date Rec'd	Comment From	General
5/14/2015	Doyle, Sharon	Support
5/14/2015	Sperber, Ron	Support
5/15/2015	Oyler, Jon	Support
5/15/2015	Powell, Nan	Support
5/15/2015	Smith, Nathan	Oppose
5/15/2015	Schwartz, Stanley	Oppose
5/15/2015	Dickens, Ishbel	Support
5/15/2015	Bishop, Sharon	Support
5/18/2015	Beaman, Delores G.	Support
5/18/2015	Pearson, Sandra	Support
7/9/2015	Dickens, Ishbel	Informational
7/14/2015	Cochran, Robert	Oppose
7/14/2015	Dickens, Ishbel	Support
7/21/2015	Smith, Nathan	Oppose
7/27/2015	Chapman, Randy	Informational
7/30/2015	Chapman, Randy	Informational
8/13/2015	Pappenheim, D.W.	Oppose
8/13/2015	Breza, Robert	Oppose
8/13/2015	Rodgers, Ronald	Oppose
8/13/2015	Kimberling, Kurt	Oppose
8/13/2015	MACQUARRIE, HARVEY	Oppose
8/13/2015	Wetmore, David	Oppose
8/13/2015	Bothman, Bruce	Oppose
8/13/2015	Pasteur, John	Oppose
8/13/2015	Dawe, Richard	Oppose
8/13/2015	Sterzelbach, Kurt	Oppose
8/13/2015	Lish, Mike	Oppose
8/13/2015	Chamberlin, David	Oppose
8/13/2015	Faulkner, Robert	Oppose

Date Rec'd	Comment From	General
8/13/2015	Willey, Bill	Oppose
8/13/2015	Valentine, Robert	Oppose
8/13/2015	Valentine, Barbara	Oppose
8/13/2015	Bech, James	Oppose
8/13/2015	Jeanneret, William	Oppose
8/13/2015	Berdal, James	Oppose
8/13/2015	Anderson, Frederic	Oppose
8/13/2015	Stewart, Jim	Oppose
8/14/2015	Campanella, David	Oppose
8/14/2015	Redeye, Thomas	Oppose
8/14/2015	Waterhouse, Gary	Oppose
8/14/2015	Vosecky, Reba	Oppose
8/14/2015	Cook, Duane	Oppose
8/14/2015	Bowe, Bright	Oppose
8/14/2015	Bowe, Bright	Oppose
8/14/2015	Buchanan, Merlin	Oppose
8/14/2015	Combs, Jerry	Oppose
8/15/2015	Brockstruck, James	Oppose
8/15/2015	Stark, Thomas	Oppose
8/15/2015	Conetto, Al	Oppose
8/15/2015	Kerber, Richard	Oppose
8/16/2015	Heebink, Jim	Oppose
8/16/2015	Felton, Tom	Oppose
8/16/2015	Martin, Dan	Oppose
8/17/2015	Toll, Ted	Oppose
8/17/2015	Gehrig, Roger	Oppose
8/17/2015	Manson, George	Oppose
8/17/2015	Richardson, Tom	Oppose
8/18/2015	Hall, Charles D.	Oppose
8/20/2015	Pasteur, Cynthia	Oppose
8/20/2015	Ball, Jasmies	Oppose
8/25/2015	Van Dyke, Gary	Oppose
8/25/2015	Roberts, Charles	Oppose
8/25/2015	Rodgers, Ronald	Oppose
8/25/2015	Morgan, Sean	Oppose
8/25/2015	Berg, Kim	Oppose
8/25/2015	Wilson, William	Oppose
8/25/2015	Williams, James A.	Oppose
8/25/2015	Johnston, Marc	Oppose
8/25/2015	Iverson, Merle	Oppose
8/25/2015	Brockman, Bob	Oppose
8/25/2015	Tellessen, Dave	Oppose
8/25/2015	Tellessen, Kathy	Oppose
8/25/2015	Flodin, Jason	Oppose
8/25/2015	Jones, Barry K.	Oppose
8/25/2015	Flynn, Stacy	Oppose
8/25/2015	Flynn, Stacy	Oppose
8/25/2015	Neil, Melvin	Oppose
8/25/2015	Sijohn, Anthony	Oppose
8/26/2015	Woltersdorf, Leonard	Oppose
8/26/2015	Gendreau, Jerry	Oppose
8/26/2015	Valentine, Robert	Oppose
8/26/2015	Felton, Tom	Oppose
8/27/2015	Rutledge, Ed	Oppose
8/27/2015	Wiess, John A.	Oppose

Date Rec'd	Comment From	General
8/29/2015	Ball, Sharon	Oppose
9/4/2015	Smith, Jay A.	Oppose
9/8/2015	Hearn, Dale	Oppose
9/8/2015	Oty, Brent	Oppose
9/8/2015	Miranda, Ernest	Oppose
9/8/2015	Sayre, Richard	Oppose
9/8/2015	Kalk, Gail	Oppose
9/8/2015	Kruse, Ben	Oppose
9/8/2015	Lind, Jon	Oppose
9/8/2015	Green, Ronald R.	Oppose
9/8/2015	Neil, Melvin	Oppose
9/8/2015	Black, Don	Oppose
9/8/2015	Young, Charles	Oppose
9/8/2015	Lindgren, Robert	Oppose
9/8/2015	Easley, David	Oppose
9/8/2015	Anderson, Frederic	Oppose
9/8/2015	Pew, Jesse	Oppose
9/8/2015	Black, Steve R.	Oppose
9/8/2015	Campanella, David	Oppose
9/8/2015	Harper, Mike	Oppose
9/8/2015	Schieche, Jerry	Oppose
9/8/2015	Hartwell, Susanne	Oppose
9/9/2015	Robertson, John	Oppose
9/9/2015	Gray, Linda	Oppose
9/9/2015	Eberly, Bill	Oppose
9/9/2015	Thompson, Gabe	Oppose
9/9/2015	Eberly, Judith A.	Oppose
9/9/2015	Harp, Jerry	Oppose
9/10/2015	Swannack, David L.	Oppose
9/10/2015	Kimberling, Elaine	Oppose
9/11/2015	Postlewait, Herb	Oppose
9/11/2015	Postlewait, Herb	Oppose
9/11/2015	Valentine, Robert	Oppose
9/14/2015	Kirkpatrick, James	Oppose
9/22/2015	Bailey, Brenda	Support
9/23/2015	Schwartz, Stanley	Oppose
10/8/2015	Ader, Randall	Oppose
10/28/2015	Eberly, Bill	Oppose
10/28/2015	Brockman, Bob	Oppose
10/28/2015	Williams, Doc	Oppose
10/28/2015	Coulson, Lawrence Allan	Oppose
10/28/2015	Johnston, Marc	Oppose
10/28/2015	Kolb, Jodi	Oppose
10/28/2015	Stewart, James	Oppose
10/28/2015	Stewart, Michele	Oppose
10/28/2015	Stewart, Ashley	Oppose
10/28/2015	Leonard	Oppose
10/28/2015	Frandsen, William E.	Oppose
10/28/2015	Gehrig, Roger	Oppose
10/28/2015	Carter, Robert	Oppose
10/28/2015	Miranda, Ernest	Oppose
10/28/2015	Wertman, Frederick	Oppose
10/28/2015	Anderson, Andy	Oppose
10/28/2015	Winchester, Charlton	Oppose
10/28/2015	Williams, Jim	Oppose

Date Rec'd	Comment From	General
10/28/2015	Conetto, Al	Oppose
10/28/2015	MACQUARRIE, HARVEY	Oppose
10/28/2015	Ball, James	Oppose
10/28/2015	Valentine, Robert	Oppose
10/28/2015	Neil, Melvin	Oppose
10/28/2015	Richard	Oppose
10/28/2015	Richard	Oppose
10/28/2015	Gendreau, Jerry	Oppose
10/28/2015	Youmans, Thomas	Oppose
10/28/2015	Campanella, David	Oppose
10/28/2015	Schroder, Robert & Lula	Oppose
10/28/2015	West, Scott	Oppose
10/28/2015	Schimdt, Rodney	Oppose
10/28/2015	Pasteur, John	Oppose
10/28/2015	Felton, Tom	Oppose
10/28/2015	Wiess, John A.	Oppose
10/28/2015	Dawe, Richard	Oppose
10/29/2015	Cook, Duane	Oppose
10/29/2015	Bowe, Bright M.	Oppose
10/30/2015	Anderson, Frederic	Oppose
10/30/2015	Stewart, Jimmy	Oppose
10/30/2015	Berdal, James	Oppose
10/30/2015	Swannack, David L.	Oppose
10/30/2015	Green, Ron	Oppose
10/30/2015	Lind, Jon	Oppose
10/30/2015	Oakes, Dean	Oppose
10/30/2015	Hines, Dick	Oppose

Date Rec'd	Comment From	General
10/30/2015	Wynia, Howard	Oppose
10/30/2015	Manson, George	Oppose
10/30/2015	Combs, Jerry	Oppose
10/30/2015	Campanella, David	Oppose
10/30/2015	Richardson, Tom	Oppose
10/30/2015	Nelson, Roger	Oppose
10/30/2015	Redeye, Thomas	Oppose
10/30/2015	Cook, Snady	Oppose
10/30/2015	Flynn, Stacy	Oppose
10/30/2015	Lind, Jon	Oppose
10/30/2015	Henry, William T.	Oppose
10/30/2015	Smith, Nathan	Oppose
10/30/2015	Rodgers, Ronald	Oppose
10/30/2015	Lockard, Dave	Oppose
10/30/2015	Clayburn, Gerald E.	Oppose
10/30/2015	Clayburn, Gerald E.	Oppose
10/30/2015	Clayburn, Gerald E.	Oppose
10/31/2015	Kimberling, Kurt	Oppose
10/31/2015	OBrien, Mike	Oppose
10/31/2015	Black, Steve	Oppose
11/2/2015	Hamilton, Scott	Oppose
11/2/2015	Robertson, John	Oppose
11/2/2015	Schwartz, Stanley	Oppose
11/2/2015	Rutledge, Ed	Oppose
11/6/2015	Jones, Barry K.	Oppose

Please contact Nathan Gwinn, ngwinn@spokanecity.org or 509-625-6893 to see entire public comments.

From: [Robert Cochran](#)
To: [Gwinn, Nathan](#)
Subject: information to consider zoning
Date: Friday, April 03, 2015 10:22:56 AM
Attachments: [spokane age chart.pdf](#)
[Spokane zoning facts and questions.pdf](#)
[accurate picture MHCs.pdf](#)

Nathan,

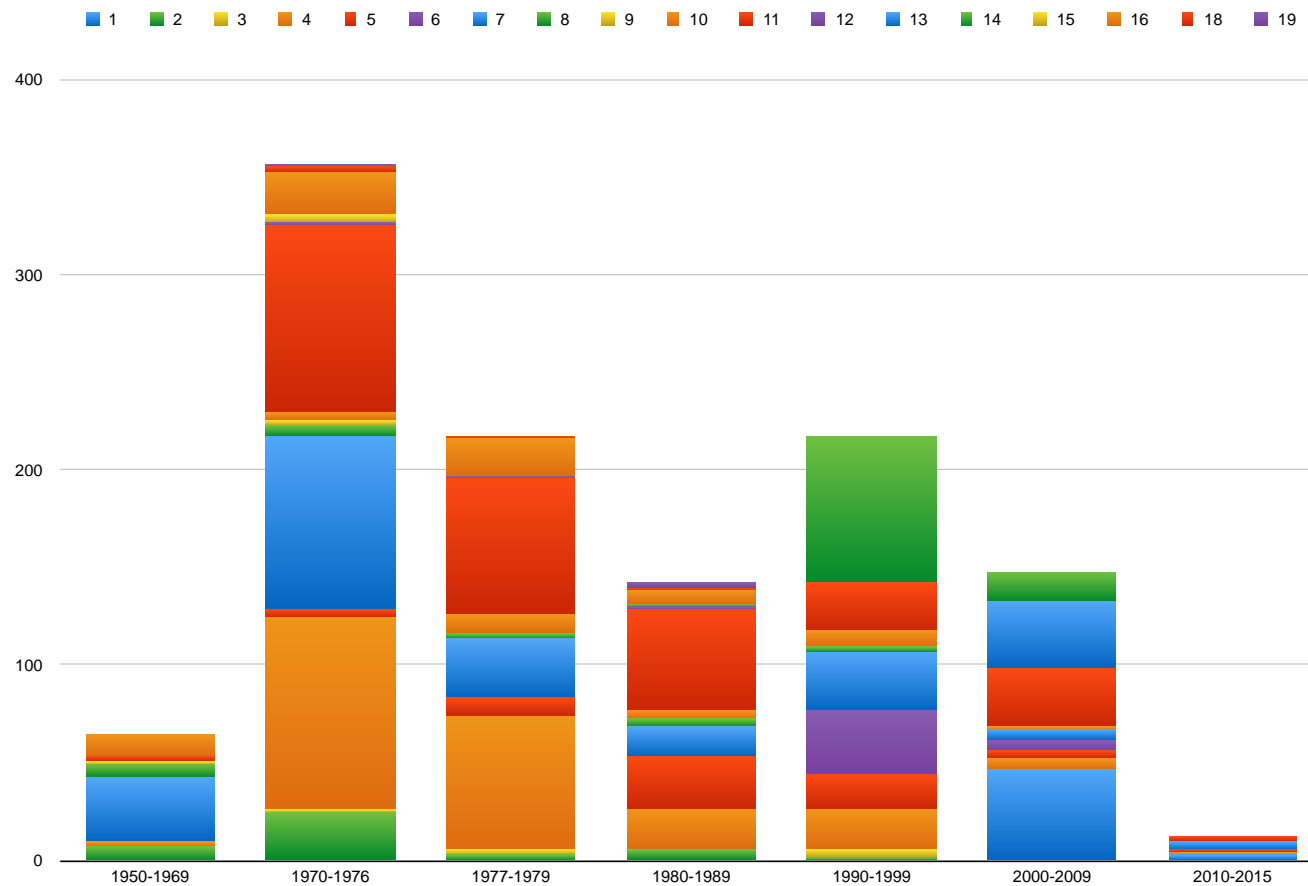
Here's three pieces of information you should have for discussion of the proposed comprehensive plan change about manufactured housing communities (to the exclusion of other manufactured homes on single private leased parcels).

One article is an attempt to give a real life view of the MHC industry, how it got to be, where it is and all that. The other is an argument against the application submitted by CM Jon Snyder which contains selective and sometimes misleading information, such as the energy saving qualities of manufactured homes and the housing densities greater than apartments.

Robert Cochran

 [icloud.com](#)

*End corporate personhood.
Regain real human peoples' rights.*



Facts of the Matter:

Existing manufactured housing in Spokane

From Spokane County Assessor:

There are 232 manufactured homes where the homeowners own the parcels. Average age of home is 24.6 years, average assessed value \$50,825. Median is \$55,300.

There are 45 manufactured homes on private parcels - homeowner rents the land. Average age of home is 34.3 years, average assessed value \$9,647. Median is \$5,800.

There are 1,125 manufactured homes on rented spaces in manufactured housing communities in the city. Average age of home is 32 years, average assessed value is \$23,218. Median is \$12,700. About 27% are over 40 years old.

There are 19¹ manufactured home communities in Spokane. Average age of community is 39 years, average number of spaces is 66. One of the oldest is 59 years, newest is 12 years. A tenant lives in a community an average of 7 to 8 years, while the manufactured home remains in place the majority of the time.

Any discussion of amending zoning designations and the perceived benefits of doing so must include the real facts of the homes and communities that exist now. Facts relating to late-model manufactured homes or their current financing or their current Energy-Star ratings cannot be generally applied to the existing stock of manufactured homes in Spokane.

The first stated goal of the application to amend the Comprehensive Plan by the City Council is to “protect residents of manufactured and/or mobile home parks from potential relocation as a result of land owner sales.” Why is this a public policy issue? Why do these residents need such protection? And why is this only a public policy concern for those in land-lease communities and not those on single leased parcels?

Washington state has a manufactured home relocation program specifically designed to help homeowners with the costs of moving their homes from communities that close.

¹ Perhaps 18, as one may be counted as two in data.

Another stated goal, or benefit, is that the amendment would preserve affordable housing that exists in manufactured housing communities by preventing closure. When communities have closed in the past, it is said they have not been replaced by new communities in the city limits. Is this true? Have no new communities been developed in Spokane? Are Spring Creek or Sundance Meadows in the city? The obvious follow-on question is then "What is the City contemplating to encourage new development of manufactured housing communities within city limits?"

Does Spokane have restrictions on the placement of manufactured homes on private parcels within the city? Are the restrictions consistent with policies mentioned in the application?

For communities that have closed, is there a net negative or positive benefit to the City? Examples the application did not mention were a small mobile home park closed to make way for a new over-crossing of Hwy 195 and a 1950's era mobile home park closed to make way for a large grocery store, gas station and independent businesses. Does the City Council feel these redevelopments were a net positive or net negative for the public? Should they have been denied to preserve homesites for the tenants in perpetuity?

If relieving homeowners in manufactured housing communities of the potential for relocation and if preservation of manufactured housing communities is in the public interest, then why has the City Council chosen to put the burden of these goals on the individual land owners of the communities? Should not the public bear the burden if the public has decided it is in society's interest to provide these protections?

One positive, successful method of preserving communities that is overlooked by the advocates of restrictive zoning is for housing authorities or other entities to buy at-risk communities in order to keep them operating. No property rights are trampled when land is purchased fairly at market from property owners, and the burden is shared by all citizens.

The topic of restrictive zoning, or protections through zoning to prevent or hinder closure of manufactured housing communities did not come before the City Council organically from local homeowners. The idea is one that is *marketed nationwide* and statewide by advocates such as Association of Manufactured Home Owners (AMHO). AMHO is a 501 (c)(3) public charity. The goal in Washington state of AMHO is to lobby to erode the property rights of

land owners to the point that manufactured homes in manufactured housing communities have perpetual rights to the rented land. Alternatively, they advocate homeowner-tenants buy their own communities in order to control and preserve them.

AMHO believes manufactured homes are only movable when the homeowner wants them to be. Otherwise, they declare the homes are immobile or will be a total loss if attempted to move and should be considered permanent. When it is convenient, AMHO speaks of valuable homes, the tenant's largest asset. At other times, they speak of homes so old that they will fall apart if moved.

They never speak of how expensive it is for a person to heat a manufactured home from 1960's, 70's and early 80's. Walls can be as thin as two inches, with one inch of fiberglass insulation behind an exterior of aluminum sheeting. Windows are metal framed, single pane, and often produce condensation inside the walls below them. A person trying to heat an inadequate old 800 sq/ft home will spend more on energy than a typical homeowner in a site-built 2000 sq/ft home. This can amount to as much as \$6,000 wasted energy cost over a typical tenancy of 7 years.

Should the City look into helping homeowners replace their inadequate energy-inefficient manufactured homes?

The reality is that the large majority (69%) of manufactured homes in Spokane are from before 1989. Almost 2/5 of the homes are pre-HUD era homes.

If the argument to preserve MHC's by restrictive zoning is meant to shield old inefficient dilapidated homes from ever being required to relocate, then the desired zoning's result is to imprison low-income homeowners in substandard housing forever while the municipality takes credit for maintaining affordable housing. It's analogous to preserving a carton of milk in the refrigerator no matter the expiration date just so you can say you have milk on hand.

The WA Dept. of Commerce has noted that in the past 10 years or so, 60% of the homes in communities that have closed were relocated for their continued use. AMHO argues erroneously that "most" homeowners are not able to move their homes.

Looking out for homeowners, one must consider the values of homes in question. How much are we talking about in these anecdotal instances of abandonment or falling apart? Are those homes worth under \$2,000? Certainly we are not talking about \$30,000 homes here being abandoned. Moving a single-wide could cost from \$3,000 to \$5,000 in this area.

As it stands now in the law, manufactured homes in MHC's are protected from being required to vacate individually. This fact has helped distort the market for these homes, for example that old 1968 single-wide home for sale can command perhaps twice or quadruple its actual value (\$7,000 vs. \$2,400) for the fact it is existing in place with protected status. Trade-in value is for scrap, as no pre-1976-HUD homes are taken in by dealers for trade as homes.

No one who pays too much for an older home will be in a financial position to turn around and trade in the home on a better-built one without suffering a huge loss of up to 80% of their equity. Therefore, the existing older homes will continue to remain in place, and will continue to waste enormous amounts of energy and will continue to lose money for their owners. While losing money to the air, tenants may defer other expensive repairs needed to the home as the aluminum window frames can cause condensation damage and mold inside, the iron plumbing rusts and breaks causing the pressed-wood subfloors to buckle or collapse. Re-piping a manufactured home can cost \$3,000 to \$5,000. Very few people who pay \$5,000 or less for a manufactured home will invest another \$10,000 to improve the windows and plumbing, knowing full well that the return on investment will be low upon a sale.

Adding restrictive zoning will exacerbate the distorted market value of existing homes in MHC's, resulting in a reduction in wealth in the long-run for tenants who buy them. It can also be noted that in the short-run, the inflated values of the homes under current law and/or under restrictive zoning do not benefit the land owners; it is an increase in value for the homeowners at the expense of the property owners' rights.

In fact, it could be argued that though homeowners enjoy an increased value for their homes individually when they sell in place, the overall condition of the community based on the aging homes will continue to decrease, dragging down its total value as a business and thus decreasing the value of the property owner's asset. Lenders and insurers take into account the average age and condition of homes in a community, which affect loan rates and premiums.

If the market allowed older homes' values in MHC's to reflect their true values, the homes would be replaced more often naturally through market forces and the community would be renewed in a slow and steady progression, maintaining a quality of community that most tenants desire and would appreciate.

Note also, that in a federal study on manufactured homes, manufactured homes on leased land did not necessarily show an increase in equity for the homeowner over time similar to conventional site-built homes. But the homeowners did show an increase in wealth-building over time from the long-term savings of not buying the land and paying for the expenses tied to land ownership. The savings-equity opportunity is a key factor for many who choose to live in land-leased communities.

Mobile home parks, or manufactured housing communities, have life-spans.

Preserving MHC's by government intervention will not make an unprofitable park suddenly profitable. It will not make an existing park more beautiful, safe or able to last another 50 years. Few if any mobile home parks were designed to last 100 years, unlike conventional home developments.

If a municipality requires MHC's to stay in business as MHC's through zoning, where will the money come from to upgrade sewer systems on zoned-MHC's when their systems fail in ten, fifteen or twenty years from now? Built in the 1950's , 60's or 70's, any MHC must consider that its water systems will need to be refurbished within the next 40 years. If the money is not there, the community will have to close, and any future development will be limited to a short list of less-profitable opportunities in the ordinance, or the tenants will have to face extreme increases in rents to keep the park viable.

Older MHC's do not close without reason. Once they're run-down, or one-third empty, or they face hundreds of thousands of dollars in infrastructure upgrades and repairs, they become unprofitable. A decent manufactured home that finds itself in a park that is unprofitable and forced to close can move to another location, so the demise of the park does not automatically spell doom for the homeowner as well.

The trailers, mobile homes and manufactured homes built before 1990 were never expected to last 100 years either. Industry standards foresaw lifespans of 15 to 25 years back then. Of course, many people continue to make use of old homes far beyond their designed expectations, for better or worse.

Encroachment by development, or a long-planned change of use, or unforeseen circumstances can all be influences that affect the life span of an MHC. Many investors and builders of MHC's never considered life spans of the property, because they do their business

short term; once built and sold, they are done. But a good number of properties were developed by individual land owners, mainly because it was the type of development that they could literally do themselves. Digging trenches for pipes, graveling roads, building fences, etc., were things a land owner could do on their own time and with their own sweat. Decades later, these individual land owners should be free to seek a return on their time and investment without their city taking away viable options.

There is no crisis of community closures, no crisis when one does close.

Granted, for any individual facing the prospect of having to uproot and relocate involuntarily, a closure can pose a crisis, especially if the situation comes as a surprise. There is a good percentage of tenants of MHC's who are blissfully unaware that a possibility exists for an end to renting the land. Most tenants are aware that they can move their homes if they don't like the situation or wish to upgrade, they just may not think in terms of closures.

Communities close. Communities open. They are like any other business, and when conditions change that require change, they do change. When communities close, unlike when an apartment building closes, the tenants do not lose their homes- they only lose where the homes are located.

When Albertson's grocery saw the opportunity to open in an area of Spokane with growth, it was not a crisis to buy out and close down a very old 1950's mobile home park. It was a transition that ended up relocating most of the homes in the span of a full year. When the Dept. of Transportation needed a parcel for Hwy 195, it was not a crisis to buy out the small mobile home park and relocate the residents. The state did this without the full year notice, because it simply bought out homeowners as well as the land owner.

The state of Washington is buying out a community on the west side in order to eliminate the flood hazard. The homes are being moved to safer locations. This is to prevent an actual crisis later.

Moving a home can be planned for, it can be saved for, or at the least it can be a known possibility, much like having to replace a furnace in a home or a transmission in a car is a known possibility. Not everyone will need to make these expenditures, but everyone is aware that these things happen.

A crisis for an MHC would be a sink-hole swallowing up the property, or an earthquake or flood destroying a majority of homes. A normal closing does not destroy homes in and of itself. If homes are said to be immobile or will fall apart when moved, that is not a result of the community closing or not, it is a state of repair the homeowner has allowed to happen. A manufactured home located on rented land is never considered a permanent installation: becoming immobile for lack of structural integrity due to ravages of time or neglect does not make a manufactured home permanent any more than a broken transmission on a car would make the car permanent.

There exist many protections for manufactured home owners who choose to rent land for their homes. There is no need to add any more protections by restrictive zoning to preserve MHC's at the sole expense of the property owner.

The most practical and affordable option to preserve an at-risk community is for the community to be purchased and operated by an entity that wants to preserve it, such as a housing authority.

If this change in zoning is in the public interest, the public should shoulder the burden.

The state Constitution states in Sec. 12 that no law shall be passed granting to any citizen, class of citizens, or corporation other than municipal, privileges or immunities which upon the same terms shall not equally belong to all citizens, or corporations. For example, protection given to homeowners within manufactured housing communities while excluding those homeowners leasing single parcels should not be allowed.

The requested zoning will have the effect of costing low-income homeowners more in energy, while wasting natural resources.

Perhaps the city should be encouraging the development of new manufactured housing communities, including 'utilitarian-style' communities, and working to replace inadequate and inefficient manufactured homes to further advance the goals the comprehensive plan speaks to.

An Accurate Picture for MHCs

The unique relationship between manufactured home owners and landlords in land-lease communities and how it has changed over the years in Washington.

Manufactured homes, or mobile homes, comprise about 9% of housing in Washington state, according to the Census and WA Dept. of Finance figures. While most of these manufactured homes are located on private land primarily in rural and suburban areas, the percentage people see often are located in communities designed for them. In Washington there are 1,400 manufactured housing communities registered with the Dept. of Revenue, representing 2.3% or so of housing.

When a person buys a manufactured home, they can choose to secure their own land and utilities, or they can choose to have their home set on a space (or lot, or pad) in a manufactured housing community where the infrastructure is already in place and easy to attach to. Those 1,400 communities host about 62,000 manufactured homes. The homeowner who opts for a community will pay a monthly rent for the space.

Why would a person rent land under their home? First and foremost, it is because they can. A manufactured home is able to be relocated with relative ease vs. site-built homes. So then for many people, the answer is affordability. Others look at practical concerns such as downsizing, a level of freedom apartments don't offer, or a stepping stone to other housing options. The average occupancy of people in such communities is 7 to 8 years. The average occupancy of the manufactured homes in such communities is much longer, as most remain in place on the rented space for others to buy and live in.

The homes are not permanent, however. Depending on location, between 10 and 20% of homes in communities are relocated. Overall US Census American Housing Survey data says 20% of *all* manufactured homes have relocated at least once from their original home site. A typical manufactured housing community in eastern Washington has found that 13% of it's manufactured homes have been replaced by other homes since 1980.

Why do homes move out of manufactured housing communities? Some homes that are for sale find buyers who want the homes for their own land. Some homeowners may seek a community that is more desirable. A small percentage of homeowners trade in their used home on a newer one. If a manufactured housing community is poorly operated or charges excessive rents, the homeowners will see that the opportunity costs of moving their homes elsewhere are less than the costs of staying in place.

This brings us to the *unique relationship* so often cited by lawmakers when crafting solutions to problems tenants and landlords face in manufactured housing communities. The person who owns the home is on rented land. If the homeowner finds it necessary to relocate their home, there is a significant cost to having professionals prepare, move and set-up the home elsewhere. The significant moving cost is a barrier that prevents homes from relocating on a whim.

For those who have invested in manufactured housing communities, the barrier to moving a home is a key to the stability of the rental business model— vacancy rates will be low, and there will always be rent due for a space with a home set on it. A homeowner-tenant will seldom suddenly pick up and move a home out of the community for a better location (but they can if circumstances dictate).

Although the same beneficial barrier can prove to be troublesome even in the simple legal action of eviction for failure to pay rent— the tenant knows the landlord cannot throw out an entire manufactured home without significant cost. Greentree Lending embraces this notion when they refuse to pay rent as lien holder when their client defaults.

For those homeowners renting space in communities, the barrier to moving can be seen as security that the community remains stable. It can also be seen as a disadvantage to themselves if circumstances are not to their liking but they cannot afford the cost of relocating their homes. Some advocates say this puts the tenants of communities on unequal footing when negotiating terms of living in the community. But what if the homeowner can easily afford to move, is there a disadvantage for them?

Alternatively, for landlords, because manufactured homes most always remain in place long after the initial homeowners place them, the barriers to relocating homes will drive down the overall value of the community by virtue of aging and depreciating values of the homes themselves. The demographics of a community are changed over time, completely out of control of the landlord.

And for the homeowners, the depreciation of the community overall will effect their own perceived equity and quality of life. The barrier to moving homes has the effect of inflating the values of manufactured homes to a point that the market is skewed. It is a double-edged sword: on the one side it is an advantage to a homeowner who sells; on the other side, a person who wishes to buy in a community must pay a price that is too high. (Paying too much for a home has the effect of preventing a homeowner from trading in the home on another home they may prefer.) The person wishing to live in a desirable community will have to take whatever home is available rather than having a realistic option of placing the home of their choice on the space.

In Washington state, lawmakers have taken to heart the unique relationship and passed laws striving to strike a balance between homeowner-tenants rights and landlords' property rights. In 1977 the Manufactured/Mobile Home Landlord-Tenant Act was signed into law.

To prevent sudden and arbitrary removal of homes from communities, there are laws in place to prohibit landlords requiring old homes to be moved upon reaching a certain age or upon their sale. (In a similar vein, homes cannot be barred from entry based solely on their age.) In current law, a homeowner cannot be evicted except for specific causes.

And in the case of an entire community closure, there is a notice period of one year required before any homeowner may be forced to vacate the property. There is also a state-run relocation program to help homeowners with moving costs if such a closure occurs.

In addition, lawmakers have set out specifics for what a landlord can and cannot include in the terms of the rental agreement, what rules a landlord can and cannot enforce, and what duties and responsibilities a landlord may not burden the tenant with. All these in the name of establishing an equal footing for tenant and landlord.

Even in the case of eviction, mediation is required for some causes, which often results in the offending tenant being evicted but their manufactured home is allowed to remain if sold to a new tenant.

The unique relationship argument has been used over and over to tweak the law for more and more protections of homeowner-tenants. The unique relationship argument was used to put in place a whole program under the Attorney General's office to administer dispute resolution of the manufactured home landlord-tenant act.

There is balance in place for the unique relationship, though some will argue it still tilts one way or the other. But in achieving this balance, the manufactured housing picture of the past does not resemble the picture of the present, and the picture of the future is uncertain.

In the development days of manufactured housing communities, new and late-model manufactured homes filled new communities. The residents comprised a mixture of income levels and demographics. Communities were all ages. Specially designed communities catered to social activities and recreation with clubhouses and swimming pools and green spaces.

In 1976, Dept. of Housing and Urban Development took over authority of manufacture of mobile homes, designating them as manufactured homes with more strict and uniform standards.

In 1988, HUD rules allowed for 55 years and over communities and 62 and over communities, essentially allowing landlords to discriminate on the basis of familial status and age. This came about from residents themselves, who wanted housing of all types to allow for senior-only "retirement" communities. Manufactured housing communities were an obvious choice for such 55+ and 62+ communities. Many seniors who choose manufactured housing communities are those who downsize from large site-built homes so they can have a social community with fewer maintenance responsibilities.

The majority of communities are still family designated, but there are a significant number of communities that converted to 55+ or were developed specifically for senior residency. Income levels are still varied in senior-only communities— all seniors are not low-income. Even though special age restricted communities are allowed, the average tenancy of a resident is still 7 to 8 years.

There were several boom times in the development of manufactured housing communities and shipments of new manufactured homes exceeded 50,000 in Washington state in a given year. During a year in the recent bust real estate market however, the total shipments of new homes was 50,000 for the *entire United States*.

At various times, especially in real estate booms, manufactured housing communities were seen for their highest and best use rather than for their current business model. Many communities were sold and redeveloped. In some localities, this posed a challenge as there were fewer new developments for homeowners to relocate in. The reality though is that a homeowner never loses their home per se in a closure, they lose the space it is located on.

In the early 1990's, lawmakers looked to put the burden on the landlord to pay for the relocation of homeowners' homes when a community closed. This was found to be unconstitutional and struck down. But the idea was resurrected as the state's relocation assistance program paid for by sales of manufactured houses located in land-lease communities (\$100 each sale).

During the especially hot real estate boom of the early 2000's, closures of communities in Washington became more noticed and the pressure to protect and preserve existing communities was increased. Advocates spoke of a crisis whenever an older community was to close. But even during the booms, new developments were created.

But the boom cycle didn't diminish the value of existing communities on its own. By the early 2000's, many communities were decades old and were comprised of homes that had depreciated to such a state that the business model of operating the community was less viable. Opportunity to achieve a higher and better use was sped up during the boom through higher land values and market demands.

The unique relationship has borne a notion that a manufactured home's moving and set-up cost should only occur once for the homeowner who chooses to live in a manufactured housing community. This notion is not universally held, however. Due to the nature of manufactured homes to be moveable and relocatable allows them to rent land in the first place. Therefore the prospect of having to pay for moving costs is always there, whether one wishes to acknowledge it or not.

Every homeowner in a manufactured housing community should be aware that there is a possibility of having to pay to relocate the home elsewhere. Many never give it a thought. To deny such a possibility is to bury one's head in the sand. Some may choose to take the chance

that they will finish their average tenancy of 7 to 8 years before the home may be required to move. Subsequent homeowners are left holding the bag.

Short of having homeowners be responsible for their own property or society paying for every home move, homeowner-advocates work to eliminate the possibility of homeowners being required to move at all. This is where the restrictive zoning sales pitch comes about from homeowner organizations.

Present day:

In the city of Spokane as a typical example, the average age of manufactured housing communities is 38.8 years old. The median age of manufactured homes in those communities is 37 years old with a value of \$12,700. Fifty-nine percent of the 1240 spaces available are in three communities whose average age is 44 years with an average of 248 spaces. The remaining spaces are in communities with an average size of 25 homes.

Many of the communities in Spokane started out as "trailer parks" or the first "mobile home parks". Some were just a plot of land with some gravel drives and a loose layout for setting the homes on spaces. Others had a more formal layout, resembling homes on a city block. The larger communities were master planned with every detail set out for spaces and amenities in an enclosed acreage.

Technically speaking, in Washington, a single parcel of land with two or more manufactured homes on it where the homeowners rent the land are considered official manufactured home communities. They are then obligated to be registered and their tenant homeowners will have all the protections of the landlord-tenant act. A single manufactured home on a single rented parcel of land is not covered with any protections like those in communities.

Some older smaller communities were set out to accommodate the mobile homes of the era of late 1950's or 1960's, usually single-wide units. As the decades roll by, and older homes leave for various reasons, late-model single wide homes are found to be too large for the spaces that have vacated. Finding replacement homes can prove to be a challenge. So some communities in this situation make the spaces available for recreational vehicles that are used as a primary residence for their owners. This gives stability to those who have only an RV as their home and it helps fill small spaces.

Recognizing this option for allowing RVs in manufactured housing communities, lawmakers have given their homeowners some protection from municipal ordinances that could force them to vacate the premises. In addition, as primary residences and not transient, the homeowners have the same protections as manufactured homes within communities.

Even the best operated communities face significant challenges as they age. At 40, 50 or 60 years old, containing homes that are as old or older than the communities themselves, there are infrastructure concerns as well as business concerns. At some point in time, refurbishing

major components of the community will become necessary. The challenge of replacing homes comes about also, in a few ways: abandonment of manufactured homes is becoming more common, economic downturns have caused some landlords to buy existing homes in default of rents and remove them to make space for newer homes. Some communities have many homes for rent because buyers are unable to purchase the homes, even at the discounted values older homes market for.

One community in Spokane has seen one abandoned home per year for the last three years. It is not inexpensive for a landlord to deal with an abandonment. The legal title must be acquired, the home has to be secured from vandalism or trespassers and vermin and the home must either be rehabilitated or disposed of. For disposal, the easiest method is to find a buyer to take it away. But that rarely happens, so an asbestos inspection must be performed and the asbestos must be removed and mitigated. Then the home can be dismantled and recycled or trashed. This process could be upwards of \$7,000 for a single-wide home that has a retail value of \$1,200 as is.

With current protections in the law preventing landlords from requiring homeowners to move out older and "dilapidated" or otherwise worthless homes, the long term result is a slow and inevitable decline of the community. The Spokane County Assessor's office said communities lose about 3 to 4% of homes' value per year. But for the protective extra value they receive by being on the valuable space within the community, older dilapidated homes would be deemed obsolete by most buyers.

As time goes by, a community that had an average mix of residents with various income levels and typically 20% low-income, and with a current stock of aging homes losing value, the community will see its demographics change and its low-income population increase. Some believe there will reach a tipping point where the community will become undesirable to the average people of various income levels and instead will be seen as only desirable as all low-income. Any community that reaches this point, far from the bright and cheery community it was 40 years ago, will see more empty spaces, more abandoned homes, higher maintenance costs and more dissatisfied tenants from lack of pride of ownership and increased crime.

With quality homes and pride of ownership, communities keep their value up better through time, in a cooperative effort between homeowners and landlords. When the quality of homes diminishes and pride of ownership is lost, communities suffer and their viability is lost.

From the perspective of homeowners, demand for independence and freedom from landlords' interference alternates with demanding the landlord take action to remove objectionable neighbors of theirs. Many tenants presume the landlord has the power to enforce rules easily or to evict anyone almost at will. This is not the case. Ultimate enforcement of rules or other terms requires a judge to rule, and the rulings are far from certain as to which way they will go.

From 1977 to 1993 the landlord had the discretion to simply choose to terminate a tenancy without cause, with some restrictions like giving the homeowner 12 months in which to

vacate. In 1998 the last of the no-cause rights of a landlord were removed. At this point, with the current language of the law, homeowners were granted de-facto perpetual rental agreements to have the land to rent forever, regardless of the land owner's wishes. The balance for the unique relationship has been skewed since, with unintended consequences for the overall welfare of communities.

There is a demand for the type of community that designed manufactured housing developments bring. There is a demand for a utilitarian model as well, one that has the basics and few amenities, with provision for many single-wide homes located near public transit access. Utilitarian community would be designed to be moderate to low-income, with used homes being placed in most cases.

Forget the Stereotypes:

Manufactured housing communities are not all trailer parks, nor are they all upper-income retirement communities. Residents of communities are not all poor, elderly, and on fixed-incomes. Many are comfortably retired, some are simply enjoying the savings of not having to own land, many are families with all ages.

Those who choose to live in manufactured housing communities are not forced to live there for lack of any other option.

All manufactured homes are movable. Those in manufactured housing communities all have the ability of being prepared, moved and set-up again elsewhere. The age of the home does not predict it's ability to be moved again. Lack of maintenance or un-repaired damage by the homeowner is far more a predictor of the home's integrity, but it does not prevent relocating.

No homeowner loses their home if they are required to move out of a manufactured housing community. They still own their home, they can still use their home, they just need to find a suitable location for the home to be set-up again. In the case of a community closure, and a homeowner cannot afford or manage to move their home, there is often a buyer interested who can and is willing to move the home to their own location.

Homeowners do pick up and take their manufactured homes out of communities they do not like, once the benefits of doing so rise above the opportunity costs. Sometimes a person will find a home they like in one community so they buy the home and have it moved to a community they prefer.

From: [Robert Cochran](#)
To: [Gwinn, Nathan](#)
Subject: Re: information to consider zoning
Date: Monday, April 06, 2015 8:16:20 AM
Attachments: [City of Spokane Mobiles.xlsx](#)
[Spokane City MHC homes.xlsx](#)

Nathan,

Yes, Greentree is a lender for homeowners. There is anecdotal evidence of them ignoring their legal responsibility to pay lot rent when their client has defaulted after the landlord has given them notice according to RCW 59.20.074. They simply do not respond to notice. It is presumed they believe that it is too much trouble for the landlord to take action to remove the home.

I got my listings from David Loomer, Levy Specialist, [REDACTED] [spokanecounty.org](#) then I went to the assessor page for each park and noted all the homes listed for them.

Here's my edited version for MHCs:

Robert Cochran

[REDACTED] [icloud.com](#)

*End corporate personhood.
Regain real human peoples' rights.*

On Apr 3, 2015, at 5:03 PMPDT, Gwinn, Nathan <ngwinn@spokanecity.org> wrote:

Good afternoon Robert,

Thank you for your comments and attachments. I will add them to the public record for this file.

I read through the "Accurate Picture MHCs" document. Is Greentree Lending, mentioned on page 2, a lender for homeowners or for the landlord property owners for unit removal?

I also read through part of the "Facts of the Matter." Your age data lines up with what I obtained from the Assessor's office, but I am still trying to track down age data for the units in Spring Creek or Contempo. It might be helpful in the next few weeks as we share information about unit age in parks in the city.

Thank you,

Nathan Gwinn | Assistant Planner | City of Spokane

509.625.6893 | ngwinn@spokanecity.org | www.spokanecity.org

From: Robert Cochran [[mailto:\[REDACTED\]@icloud.com](mailto:[REDACTED]@icloud.com)]

Sent: Friday, April 03, 2015 10:22 AM
To: Gwinn, Nathan
Subject: information to consider zoning

Nathan,

Here's three pieces of information you should have for discussion of the proposed comprehensive plan change about manufactured housing communities (to the exclusion of other manufactured homes on single private leased parcels).

One article is an attempt to give a real life view of the MHC industry, how it got to be, where it is and all that. The other is an argument against the application submitted by CM Jon Snyder which contains selective and sometimes misleading information, such as the energy saving qualities of manufactured homes and the housing densities greater than apartments.

Robert Cochran

 [icloud.com](mailto:robert@icloud.com)

*End corporate personhood.
Regain real human peoples' rights.*

From: [Judith White](#)
To: [Gwinn, Nathan](#)
Cc: [*MHOA Office](#); [09](#) [*Bob Burton](#)
Subject: Manufactured/Mobile Home Communities in the Greater Spokane Area
Date: Monday, April 06, 2015 11:17:09 AM
Attachments: [Role of the LAT in Washington State.docx](#)

Greetings Nathan: The Legislative Action Team under the leadership of the late John Landis set out to identify and update the complete list of all the communities in Washington State. We found that the Department of Commerce list was sadly lacking in accuracy. Now the Department of Revenue is the keeper of the list, and we turned over our list electronically to them to update their records in 2012 after redistricting. Our list is by Legislative District. Approximately there are 1,600 Communities in Washington State with 74,800 lots/spaces. The Department of Commerce continues to keep us informed on closures and we monitor their lists. Kudos to Spokane for Manufactured/Mobile Home Zoning to protect these communities. It is the last bastion of "Affordable Unsubsidized Housing", (I use affordable lightly as some are pricing folks out of their homes). Having lived in a Manufactured zoned community in the City of Renton, also having the Community as a Recognized Community by the City was definitely a plus and added to the peace of mind of those Seniors living in that environment. If I can be of any more help, don't hesitate to call or email. Judith E. White, Chair of the Legislative Action Team serving the Manufactured/Mobile Home Community. 206-932-0433

LEGISLATIVE District No. 03

Manufactured Home Communities

Esmeralda North Mobile Home Park — 6 spaces
4004 East Longfellow Avenue, Spokane 99217-6737
Ken's Mobile Home Park -4 spaces
4328 East Longfellow Avenue, Spokane 99217-6705
Sans Souci West Mobile Home Park — 219 spaces
3231 West Boone Avenue, Spokane 99201-3108
Scotty's Mobile Home Park — 4 spaces
4015 East Rowan Avenue, Spokane 99208-6014
Wishing Well Village Mobile Home Park — 62 spaces
4911 North Florida Street, Spokane 99217-6709

Total 295 – 5 Communities

LEGISLATIVE DISTRICT NO. 06

Manufactured Home Communities

Aero Mobile Home Park – 5 spaces
1649 South Campbell, Airway Heights 99001-?

Ail Seasons Motel – 10 spaces
12525 West Sunset Highway, Airway Heights 99001-9425

Airway Express Inn & Mobile Home Park — 18 spaces
South 3809 Geiger Boulevard, Spokane 99224-5413

Cascade Manufactured Home Community— 283 spaces
2311 West 16th Avenue, Spokane 99224-4460

Contempo Mobile Home Park — 220 spaces
1205 East Lyons Avenue, Spokane 99208-5168

Crestwood Mobile Home Park – 16 spaces
12823 West 13th Avenue, Airway Heights 99001-?

Crystal Springs Mobile Home Park — 6 spaces
1925 West 26th Avenue, Spokane 99224-4518

Explorer Mobile Home Park — 15 spaces
7715 West Westbow Boulevard, Spokane 99224-9034

Gonzalez Mobile Home & RV Park — 26 spaces
2515 South Geiger Boulevard, Spokane 99224-5429

Hayford Village Manufactured Home Park – 146 spaces
10510 West Richland Road, Cheney 99004-8628

Hideaway Mobile Home Park 68 spaces
4315 South Cheatham Road, Spokane 99224-5314

Hilltop Mobile Home Park 36 spaces
5314 West Sunset Highway, Spokane 99224-9049

Homestead Mobile Home Park 6 spaces
7111 North Altamont Street, Spokane 99217-5089

Indian Canyon Mobile Home Park 44 spaces
3803 West Greenwood Road, Spokane 99224-1221

Iron Wheel Mobile Home Park — 42 spaces
2002 South Inland Empire Way, Spokane 99224-4200

Lawson-Campbell Mobile Park — 89 spaces
12527 West 20th Avenue, Spokane 99001-?

Miller Park — 38 spaces
6805 North Crestline Street, Spokane 99217-7511

Morgan Park — 45 spaces
7303 North Crestline Street, Spokane 99217-7754

Mullen Hill Mobile Home Park – 119 spaces
8900 South Mullen Hill Road, Spokane 99224-9268

North Cheney Mobile Home Park – 62 spaces
2225 1st Street, Cheney 99004-2022

Olia Meadows – 6 spaces
1212 South Grove Road, Spokane 99224-9597

Pine Grove Mobile Estates – 26 spaces
840 West 1st Street, Cheney 99004-9748

Pine Village #2 – 19 spaces

735 West 1st Street, Cheney 99004-1243

Pine Village Park 16 spaces

735 West 1st Street, Cheney 99004-1243

Ponderosa Mobile Home Park – 44 spaces

6417 North Cincinnati Street, Spokane 99208-5288

Rainbow Trailer Park – 29 spaces

13919 West 12th Avenue, Airway Heights 99001-5041

Shady Pines Mobile Home Park – 35 spaces

4221 South Geiger Boulevard, Spokane 99224-?

Spring Creek Community – 34 spaces

3204 South Inland Empire Way, Spokane 99224-9682

Starlite Mobile Home Park – 11 spaces

800 Barker Street East, Medical Lake 99022-?

Sundance Meadows – 25 spaces

10400 North Nine Mile Road, Nine Mile Falls 99026-9276

Sunny Creek Manufactured Housing Community – 91 spaces

1111 West Qualchan Drive, Spokane 99224-9602

Vietzke Village – 57 spaces

2011 South Craig Road, Airway Heights 99001-9757

West Bay Park Resort -63 spaces

3800 West Bay Road, Loon Lake 99148-9643

West Plains Rental Properties – 29 spaces

1430 South Albert Street, Airway Heights, 99001

West Prairie Village — 140 spaces

2201 North Craig Road, Spokane 99224-8545

Total:1919 Lots/Spaces 35 Communities

Finish Line MH Court – 21 (509) 747-6341-21 Units- Closed in 2012-9/12

3911 S. Inland Empire Way, Spokane 99224-9264

Presnel Trailer Court – (509)-235-2173

2225 1st St., Cheney, 99004

Role of the Legislative Action Team LAT in Washington State

There are 1,600 Communities in Washington State with approx. 74,000 Lots/Spaces

The **Legislative Action Team** or **LAT** is **INDEPENDENT** of State Organizations and is comprised of Member Participants/Tenants/Homeowners who basically live in Manufactured/Mobile Homes in Washington State and also have a **COMPUTER**. The only requirement to join is to have an email address, give a physical address, and telephone number for membership. There is no charge and it is **free**. Members are **blind copied** to protect their email addresses. **LAT** participation involves a commitment to pursue what is best for tenants living in Manufactured/Mobile Homes across the State of Washington. One does not necessarily have to live in Manufactured/Mobile Homes to be a member participant. It is joining together, adding ones voice to make a difference for tenants.

The current advisory board is comprised of: Judith White, Chair, Ken Newton, Don Armstrong, Bob Ashmore, Andy Bergman, Dan Barrett, Ginny Leach, and honorary life time members Bob Case and James Dean.

Role of the Advisory Board, possess a keen interest in legislative issues, give direction, recruit new members, do research such as identifying key Mayors, Assessors, Political figures, and Media that will support our cause.

It is **not** imperative that a member participant belong to a State Organization in Washington such as **AMHO** and or **MHOA**, just that they are supportive of the plight of Manufactured/Mobile Home Owners in the State. Our primary focus is **TENANTS/HOMEOWNERS!**

The **LAT** attempts to be informative to its member participants regarding meetings and events being held in Washington State that impact the lives of Manufactured/Mobile Home Owners. The **LAT** will send out courtesy notices regarding meetings from State Organizations when informed of same, and also attempts to keep its membership informed and educated on the AG's Dispute Resolution Program which the **LAT** was very instrumental in getting passed. A goal is to inform via **COMPUTER** regarding **Lobby/Advocacy Days**, and affiliate programs that are supportive of Manufactured/Mobile Home Issues, such as **WLIHA (Washington Low Income Housing Alliance)** and the **Washington State Senior Citizen's Lobby** that are active in Washington State.

How the LAT functions: We ask our member participants in the 49 Legislative Districts in the State to build a **COMPUTER** tree within their sphere of influence, and when they get a message for their legislative district requesting action that they pass it on to their friends and acquaintances and also to personally **ACT on the MESSAGE**. It can be by calling the Legislative HOTLINE at **1-800-562-6000**, emailing their legislator asking for support of a particular bill, or if physically possible coming to Olympia to sign in, testify if necessary, visit legislators, and be feet on the ground. Over the years the **LAT** has developed data sheets for each Legislative District, identifying legislators and recording their voting records on Manufactured/Mobile Home Issues.

Role of the Legislative Action Team LAT in Washington State

The Future: Our number one priority is to keep our member participants informed. Learning how to maximize the use of our cell phones to call our Legislators, and encouraging our communities to hold Candidate Forums, Legislative Town Halls/Educational Opportunities about the Laws for Landlords/Tenants and continuing to recruiting more member participants across the state.

Our Hope is that the State Organizations can speak with one voice in support of the Manufactured/Mobile Home Owners Legislative agenda and the **LAT** will do its best to sell it via **COMPUTER**.

2015 offers new opportunities to tell our stories to new Legislators, who have chosen to serve you and the State of Washington. The LAT informs our public servants what their rights are under RCW 59.20 in visiting communities in their districts and also how many Communities there are in their respective districts. Member Participants in the LAT are also notified who is seeking public office in their district.

All funding and equipment for the LAT is by private donation

 msn.com
3/05/2015jw

From: [Randy Chapman](#)
To: [Gwinn, Nathan](#)
Subject: AMHO never sleeps
Date: Tuesday, April 07, 2015 6:38:21 PM


Ishbel Dickens from the National Manufactured Home Owners group sent this:

Basically I tell people that manufactured home owners tend to be older and poorer than the general population – this is true nationally and I suspect true in WA also. Hope that helps.

Ishbel lives in Seattle and is an advisor to the AMHO board and one of the original founders of AMHO and she is always willing to help if you need more answers in the future.

See you tomorrow.

--

Randy Chapman
President
Association of Manufactured Home Owners
PO Box 30273 Spokane, WA 99223
 [gmail.com](#)
509-343-9624

Learn from the mistakes of others.....You can't live long enough to make them all yourself.

From: [Robert Cochran](#)
To: [Meuler, Louis](#)
Cc: [Gwinn, Nathan](#)
Subject: Apr 8 Mfd Housing topic
Date: Thursday, April 09, 2015 8:36:02 AM

Spokane Plan Commission, interim director Louis Meuler:

Thank you for taking comments and allowing questions to be answered at the workshop yesterday.

In answer to Mr. Dullanty's question of how many homes in Contempo MHP are pre-HUD, here is the breakdown:

1950-1969 = 3, 1970-1976 = 98, 1977-1979 = 69, 1980-1989 = 21, 1990-1999 = 21, 2000-2009 = 5, 2010-2015 = 1

That makes it to be 45% pre-HUD homes in Contempo MHP, 86% are pre 1990 when energy savings began to be a concern (EnergyStar started in 1992?) Washington's "SuperGood Cents" program started later 90's I believe.

The other question about recent parks closing: the Finish Line on Hwy 195 was purchased outright by the Dept of Transportation. Several of the homes were owned by the park owner and rented out. A few were owner-occupied. The state bought them all. Dept. of Commerce had no data on this closure because it did not make use of the Mfd Home Relocation Program. One tenant from there bought a MH in Contempo.

If the commission needs any other information or data, I will strive to get it for them.

Robert Cochran

 [mac.com](#)

Contempo Spokane MHP 509-994-1909

State president, Manufactured Housing Communities of Washington

From: [Randy Chapman](#)
To: [Gwinn, Nathan](#)
Subject: Re: FW: MEDIA RELEASE - City Considers Land Use Changes, Mobile Home Park Preservation
Date: Thursday, April 09, 2015 9:34:34 AM
Attachments: [image001.png](#)

Good morning Nathan,

Thanks for the great presentation yesterday and please remember to send the Power Point presentation to me if you will. I would also like to know who the other presenter was, I didn't catch his name and I want to thank him and see if he will send his presentation as well. Do you happen to have the name of the attorney that was the first speaker?

One of the questions that came up was about co-op's or condo situations for Manufactured housing in Spokane. I believe the only one I am aware of is the property just to the north of Cascade on W 16th. I believe someone told me that was a community of condo owned units (about 15 or so). The only other one I have heard about is a community in Deer Park that is a co-op situation. If in your research you find others or can clarify the two I just listed please keep me updated and if I should hear of others I will do the same.

AMHO is always available to help with any questions you may have.

On Tue, Apr 7, 2015 at 5:12 PM, Gwinn, Nathan <ngwinn@spokanecity.org> wrote:

Good afternoon Randy,

Thanks for taking my call. Here is my email address.

Nathan Gwinn | Assistant Planner | City of Spokane

[509.625.6893](tel:509.625.6893) | ngwinn@spokanecity.org | www.spokanecity.org

From: Gwinn, Nathan
Sent: Tuesday, April 07, 2015 1:25 PM
To: Gwinn, Nathan
Subject: FW: MEDIA RELEASE - City Considers Land Use Changes, Mobile Home Park Preservation

Mobile and Manufactured Home Park Preservation Policy Comprehensive Plan Amendment

File Z1400065-COMP

The media release to provide information about the upcoming Open House for all annual Comprehensive Plan amendment applications on Wednesday, April 15, 2015, is provided below. The Open House will be held from 4:00 to 6:00 P.M. in the Chase Gallery, Lower

Level of City Hall.

A City of Spokane Plan Commission workshop on the Manufactured Home Park Preservation Comprehensive Plan amendment application is also scheduled for tomorrow, April 8, 2015, at 2:00 P.M., in the Council Briefing Center, Lower Level of City Hall. The Plan Commission meeting agenda is attached.

You are receiving notice because you indicated interest in this proposal or are a representative of a neighborhood council in the city of Spokane. Other individuals and organizations interested in being on the mailing list should email ngwinn@spokanecity.org or call at (509) 625-6893. If you would not like to continue to receive emails about this topic, please let me know.

For more information, related documents may be viewed online at the Planning & Development Department's web page for the application:

<http://my.spokanecity.org/projects/policy-re-manufactured-and-mobile-home-parks/>

Thank you,

Nathan Gwinn | Assistant Planner | City of Spokane

[509.625.6893](tel:509.625.6893) | ngwinn@spokanecity.org | www.spokanecity.org

From: Hatcher, Pradeep

Sent: Tuesday, April 07, 2015 12:00 PM

To: Hatcher, Pradeep

Subject: MEDIA RELEASE - City Considers Land Use Changes, Mobile Home Park Preservation



City of Spokane—Media Release

www.spokanecity.org

MEDIA RELEASE

April 7, 2015

Contact: Julie Happy

[509.625.7773](tel:509.625.7773)

jhappy@spokanecity.org

CITY CONSIDERS LAND USE CHANGES, MOBILE HOME PARK PRESERVATION

OPEN HOUSE ON AMENDMENTS SET FOR APRIL 15

The City's [Planning and Development Department](#) is hosting an Open House for three proposed land use map and zoning changes and one text amendment proposal related to mobile and manufactured home parks.

WHAT: Open House: Annual Comprehensive Plan Land Use
Amendments

WHEN: Wednesday, April 15 (4-6 p.m.)

WHERE: City Hall (Chase Gallery, lower level)

The Open House will offer citizens a chance to ask questions and learn about the proposals from City planning staff. The public comment period for the land use amendments began March 9 and will continue until May 7.


Amendments include a proposal to change the land use of a 7500 square foot lot near Market Street and Cleveland from “Residential” to “General Commercial,” a proposal to change land use from "Residential" to "Office" on N. Maple Street in the North Hill neighborhood, a proposal to change the land use from “Residential” to “Center & Corridor Core” on two parcels near South Perry Street between 10th and 11th Avenues, and a policy to designate appropriate areas to preserve mobile and manufactured home parks.

- [Visit the 2014/2015 Comprehensive Plan Amendment Cycle to learn more](#)
- [View a summary of the Comprehensive Plan Amendments](#)



About the City of Spokane

The City of Spokane, home to more than 210,000 people, is located in the heart of the Inland Northwest. Our 2,000 employees strive to deliver efficient and effective services that facilitate economic opportunity and enhance the quality of life for all our citizens. For more information, visit spokanecity.org and follow us [spokanecity](#) on [Facebook](#), [Twitter](#) and [Instagram](#).

--
Randy Chapman
President
Association of Manufactured Home Owners
PO Box 30273 Spokane, WA 99223
 [gmail.com](#)
509-343-9624

**Learn from the mistakes of others.....You can't live long enough to
make them all yourself.**

From: [Randy Chapman](#)
To: [Gwinn, Nathan](#)
Subject: Fwd: FW: Seattle Times article
Date: Thursday, April 09, 2015 2:07:59 PM

Thanks Nathan for sending the presentations from yesterday's meeting. I'm sending something to you that we as an organization have been sending out to our members and others about the plight of Manufactured Home owners everywhere. If you can send me the email addresses of the planning commission members and the city council members I will send this series of articles on to them too. I would ask you to send this out but I want to make sure my contact information is at the bottom of the email.

<http://www.seattletimes.com/business/real-estate/the-mobile-home-trap-how-a-warren-buffett-empire-preys-on-the-poor/>


Here is Buffet's response:

http://www.omaha.com/money/predatory-label-put-on-berkshire-division-clayton-homes-disputes-article/article_18cd384e-da23-11e4-9e89-7ffdf36b849.html

And the investigative reporters' reply to that!:

<http://www.publicintegrity.org/2015/04/06/17081/look-berkshire-hathaways-response-mobile-home-trap-investigation>

--

Randy Chapman
President
Association of Manufactured Home Owners
PO Box 30273 Spokane, WA 99223
@gmail.com
[509-343-9624](tel:509-343-9624)

Learn from the mistakes of others.....You can't live long enough to make them all yourself.

From: [Randy Chapman](#)
To: [City Council Members](#)
Cc: [Gwinn, Nathan](#)
Subject: Fwd: FW: Seattle Times article
Date: Tuesday, April 14, 2015 8:43:07 AM

I want to forward this to all of you as this is not good news for Manufactured Housing, not only across the country but here at home as well.

Original Seattle Times article:

<http://www.seattletimes.com/business/real-estate/the-mobile-home-trap-how-a-warren-buffett-empire-preys-on-the-poor/>


Here is Buffet's response:

http://www.omaha.com/money/predatory-label-put-on-berkshire-division-clayton-homes-disputes-article/article_18cd384e-da23-11e4-9e89-7ffdf36b849.html

And the investigative reporters' reply to that!:

<http://www.publicintegrity.org/2015/04/06/17081/look-berkshire-hathaways-response-mobile-home-trap-investigation>

--

Randy Chapman
President
Association of Manufactured Home Owners
PO Box 30273 Spokane, WA 99223
 [gmail.com](#)
509-343-9624

Learn from the mistakes of others.....You can't live long enough to make them all yourself.

From: [Randy Chapman](#)
To: [Gwinn, Nathan](#)
Subject: Fwd: This is disturbing to say the least
Date: Tuesday, April 14, 2015 9:40:26 AM

Ok so now were even. I forgot to send this one to you when I sent it to the rest of the Commission members.

----- Forwarded message -----

From: **Randy Chapman** <[REDACTED]@gmail.com>
Date: Tue, Apr 14, 2015 at 9:12 AM
Subject: This is disturbing to say the least
To: ddellwo@spokanecity.org, jdietzman@spokanecity.org, aernst@spokanecity.org, grosser@spokanecity.org, everduin@spokanecity.org, dburnett@spokanecity.org, lmeuler@spokanecity.org, bmcclatchey@spokanecity.org, fdullanty@spokanecity.org, dhegedus@spokanecity.org, treese@spokanecity.org

I will be happy to discuss this with any of you at your convenience.

<http://www.seattletimes.com/business/real-estate/the-mobile-home-trap-how-a-warren-buffett-empire-preys-on-the-poor/>

Here is Buffet's response:

http://www.omaha.com/money/predatory-label-put-on-berkshire-division-clayton-homes-disputes-article/article_18cd384e-da23-11e4-9e89-7ffdf36b849.html

And the investigative reporters' reply to that!:

<http://www.publicintegrity.org/2015/04/06/17081/look-berkshire-hathaways-response-mobile-home-trap-investigation-->

Randy Chapman
President
Association of Manufactured Home Owners
PO Box 30273 Spokane, WA 99223
[REDACTED]@gmail.com
[509-343-9624](tel:509-343-9624)

Learn from the mistakes of others.....You can't live long enough to make them all yourself.



COMMENT SHEET

Open House for Comprehensive Plan Amendment Proposals

April 15, 2015

For more project info visit:

<https://my.spokanecity.org/projects/comprehensive-plan-amendment-cycle-2014-2015/>

Name: FRANCES KENDRICK

ADDRESS: 3231 W BOONE #9

PHONE NUMBER: 325-2949

E-MAIL CONTACT: [REDACTED]@GMAIL

Proposal Name or Project # that this comment is about:

MANUFACTURED HOME PRESERVATION

See attached typed sheet

Please feel free to share your questions, comments or concerns with us!

Postal Mail – fold this comment card in thirds, add postage and drop in the mail

Phone – call us at #625-6185

E-mail – write to us at tblack@spokanecity.org

Thank you...We look forward to hearing from you!

Mobile home communities are advantageous to the environment and the community.

1. They achieve a density which can only be matched by multifamily housing buildings. The land saved by this higher density is good for the environment, and provides incentives for commercial and public services nearby.
2. Their density makes it easier to serve them by public transportation.
3. Many are long-standing, tightly knit communities, providing social support and stability, becoming an asset to community at large.
4. They provide permanent housing for low income people who would otherwise require government subsidized housing or would become homeless.
5. They help fulfill the goal of the Growth Management Act (36.70A RCW) "to encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock..."
6. A large number of mobile home park residents are senior citizens with limited housing options.
7. Closure deprives families of shelter, disrupts the wage earner's employment and forces children to change schools, but also often deprives the family of its major asset, as mobile homes often must be abandoned when a community closes.
8. Closure creates a crisis for local government and social service agencies, as dozens or hundreds of families are left without housing.

The advantages to keeping mobile homes is so great that many states and the federal government have grants to enable the upgrading (usually by new purchase) of older homes.

Protecting mobile home parks by zoning allows for stability, provides incentive to improve property, and enable fair taxing.

-freely adapted from

"An Examination of Manufactured Housing as a Community-and Asset-Building Strategy, "Center for Housing Studies of Harvard University;

National Consumer Law Center,;

Snohomish County Council Amended Ordinance No. 07-029 may be especially helpful.



COMMENT SHEET

Open House for Comprehensive Plan Amendment Proposals

April 15, 2015

For more project info visit:

<https://my.spokanecity.org/projects/comprehensive-plan-amendment-cycle-2014-2015/>

Name: Tadett Moxin

ADDRESS: 3231 W. Boone **PHONE NUMBER:** 466-3653

E-MAIL CONTACT: _____

Proposal Name or Project # that this comment is about: _____

I'm in support of the mobile home
preservation Policy

Please feel free to share your questions, comments or concerns with us!

Postal Mail – fold this comment card in thirds, add postage and drop in the mail

Phone – call us at #625-6185

E-mail – write to us at tblack@spokanecity.org

Thank you...We look forward to hearing from you!



COMMENT SHEET

Open House for Comprehensive Plan Amendment Proposals

April 15, 2015

For more project info visit:

<https://my.spokanecity.org/projects/comprehensive-plan-amendment-cycle-2014-2015/>

Name:

Allison Smith

ADDRESS:

3231 W. Boone Ave

PHONE NUMBER:

#18
303-514-5155

E-MAIL CONTACT:

[REDACTED] hotmail.com

Proposal Name or Project # that this comment is about:

I am 100% in favor and of

and support the

Preservation Policy

Text Amendment.

- Allison
Smith

Please feel free to share your questions, comments or concerns with us!

Postal Mail – fold this comment card in thirds, add postage and drop in the mail

Phone – call us at #625-6185

E-mail – write to us at tblack@spokanecity.org

Thank you...We look forward to hearing from you!



COMMENT SHEET

Open House for Comprehensive Plan Amendment Proposals

April 15, 2015

For more project info visit:

<https://my.spokanecity.org/projects/comprehensive-plan-amendment-cycle-2014-2015/>

Name: JERE MANSFIELD
ADDRESS: 3231 W BORNE AVE #4 **PHONE NUMBER:** 509 926 0885
E-MAIL CONTACT: [REDACTED] SKJTMUSOW.ORG

Proposal Name or Project # that this comment is about:

COMP PLAN AMENDMENTS OPEN HOUSE
MANUFACTURED HOME PRESERVATION POLICY PROPOSAL

I support a mobile home zoning proposal. It is important to preserve affordable housing in City of Spokane. It will be cost saving for the city to do so many elderly & low income people rely on affordable mobile home living, which create a supportive community & contribution to the City of Spokane.

Please feel free to share your questions, comments or concerns with us!

Postal Mail – fold this comment card in thirds, add postage and drop in the mail

Phone – call us at #625-6185

E-mail – write to us at tblack@spokanecity.org

Thank you...We look forward to hearing from you!

From: [REDACTED]comcast.net
To: [Gwinn, Nathan](#)
Cc: [Doyle, Sharon](#)
Subject: Resolution 2014-0103
Date: Sunday, April 26, 2015 1:24:22 PM

Dear Mr. Winn,

My name is Sanford E. Gerber. I live in unit #34 at the Sans Souci West manufactured home park (3231 W. Boone Ave.). I am almost 82 years old, and am very concerned that Resolution 2014-0103 has yet to be adopted by the city. It would be a severe burden to have the property removed from under my house. It would literally be physically and fiscally impossible for me to move. Hence, I (and all my neighbors) seek prompt approval of this resolution to protect our homes. I am a retired teacher, and live on my pension. Where and how would I move? I ask that you do whatever is in your purview to move this along. Thank you.

Sanford E. Gerber
3231 W. Boone Ave., #34
Spokane, WA 99201

509-448-0380

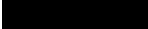
[REDACTED]comcast.net

From: [Pam Whittekiend](#)
To: [Gwinn, Nathan](#)
Subject: RESOLUTION2014-0103 -Manufactured Home zoning plan
Date: Thursday, April 30, 2015 4:35:31 PM

Mr. Gwinn

It recently come to our attention that a rezoning plan for our area was being considered. Any other zoning than Residential Single Family would put hundreds of retired individuals homes at risk. Those of us living in Sans Souci West Mobile Home Park currently live with the possibility of being booted off our lots with only a years notice. Many of the mobiles are too old to move and not accepted in other areas of the city. Most of the folks are like us with a limited income. We NEED areas like this, where we can live within our budgets in our own homes. Should we be placed in a "must move" situation we would lose everything we have worked so hard for, to give us a nice place to live in, we have no savings left "to start over" nor the income to allow us to get a mortgage again, let alone the time left to pay one off. We need the protection Residential Single Family zoning would give us.

From another angle, we need to protect the river from building and the following pollution. Money is not going to help that, we simply need to safely maintain what is there, not add to it.

E. Jay & Pamela Whittekiend
Sans Souci West
3231 W. Boone site 831
509-868-0877
icloud.com

Sent from my iPad

From: [Cheryl Roberts](#)
To: [Gwinn, Nathan](#)
Subject: Resolution 2014-0103
Date: Thursday, April 30, 2015 5:25:10 PM

My Name is Cheryl J Roberts,
Address: Sans Souci West 3231 W. Boone Ave. #414 Spokane, WA 99201
Phone (509) 838-2556
email [REDACTED] [gmail.com](#)

I am writing to encourage you to change the zoning, here at Sans Souci West, to a mobile home only designation. My understanding is that the way it is now designated leaves us vulnerable to losing our homes, with only a one year notice from the Shriners, our landlords.

I have lived in this community for three years. I am a low income, single senior. Moving would be such a hardship for myself and others in this park. Living here is so perfect and I cannot imagine having to move. Please understand our pleas to make us more secure by zoning this park to include only mobile/ manufactured homes.

Respectfully, Cheryl J. Roberts



Sue J <[REDACTED]@gmail.com>

Policy re: Manufactured & Mobile Home Parks Z1400065COMP

1 message

RECEIVED

Sat, May 2, 2015 at 10:06 AM

Sue J <[REDACTED]@comcast.net>

To: ngwinn@apokanecity.org

Cc: tblack@apokanecity.org

Bcc: sueeil <[REDACTED]@comcast.net>

MAY 06 2015

PLANNING & DEVELOPMENT SERVICES

Dear Mr. Gwinn and Mr. Black

I am writing to express my support for Policy re Manufactured & Mobile Home Parks Z1400065COMP. I live at N. 10419 Maximilian Lane, Nine Mile Falls, WA 99026 and I am an owner of a manufactured home in the Sundance Meadows Community. We actually live within the city limits, but use the Nine Mile Falls, post office.

I am a Realtor with Plese Realty, and have the SRES (Senior Real Estate Specialist) designation. I work with seniors in housing every day of the week. I chose to buy & live in Sundance Meadows because the home price was affordable for me, and there is a safety within the park boundaries for a single woman. We also have a great sense of community. I have lived here for 10 years, and have sold many homes in manufactured parks over the past nine years, so I understand the concerns of the tenants.

In my community, we have separate large lots that allow us to have a yard and a garage & driveway. I have invested extra money in my home in landscaping, a covered deck, A/C, etc. If the park were closed, I could not afford to buy another home on the Northwest side of Spokane, which is closest to my family.

This park was developed with permanent application of homes, so they would be pretty much impossible to move, but I understand the concerns of tenants in other parks. I also know that once a home is sold as a resale & moved, financing is impossible to obtain, and that detracts from the value of the home.

When these parks are sold to developers & closed, it then becomes a greater burden on the city to obtain & provide housing for these low income residents, or the tenants become homeless which becomes a greater problem.

With the recovery of the economy, there will be investor buyers lurking to purchase large parcels of property for close in development & all the parks in the city are susceptible to this process. A buyer with a large chest of cash can afford to buy & and wait the two years required by law to empty the park. As Realtors, we see the trend to homeowners wanting to live close in to city amenities & neighborhoods. Witness Kendall Yards.

I believe that implementing this policy will force the landowners to maintain their parks in a proper manner to keep their income flowing. A nicely managed park brings more income for the owner. A nicer park has more tax value & brings more tax dollars to the city coffers.

5/2/2015

Gmail - Policy re: Manufactured & Mobile Home Parks Z1400065COMP

I am a proponent of affordable housing, particularly for seniors. I believe you should take care in considering what the ramifications of not implementing this policy would entail. Please understand that protecting affordable housing benefits the entire population of Spokane. As we go into financial recovery, affordable housing is going to become even harder to maintain.

Sincerely yours,


Sue Jessup, Broker Plese Realty, LLC
[REDACTED]comcast.net 1-509-499-7656

N. 10419 Maximilian Lane
Nine Mile Falls, WA 99026

RECEIVED

MAY 06 2015

PLANNING & DEVELOPMENT SERVICES

Planning and Development Services
Attn: Nathan Gwinn, Asst. Planner

My Name: Vicki Mason

My Address: San Jose West
3231 W. Boone Ave. Unit #1
Spokane, WA 99201

My Phone: (509) 321-7273

My E Mail: [REDACTED] comcast.net

Project Name: RESOLUTION 2014-0103
Manufactured Home Zoning Plan

I have lived here for 2 years. My husband passed away 5 years ago and I could not afford to stay in my house. I sold it and after looking at many townhouses and condos, decided to move here.

I made this decision ~~because~~ for the following reasons:

1. This is a beautiful and clean park.
2. I live on a fixed income
3. There is a great sense of community here.
4. Close to downtown.

If I were forced to move, I have no idea where I would go. My mobile home is 1970 = pre HUD - cannot be moved. I would lose not only the price I paid for my home, but also \$25,000 I spent to make it livable.

Please, Pass this Resolution

From: [Janet Toone](#)
To: [Gwinn, Nathan](#); [Black, Tirrell](#)
Subject: Policy re Manufactured & Mobile Home Parks Z1400065COMP
Date: Wednesday, May 06, 2015 7:34:07 PM

I purchased a mobile home in the Ponderosa Mobile Home Park on space 45. I purchased this home because I planned to be able to live on my limited retirement income without assistance. I have put about \$8,000.00 into this mobile home including a new roof and other improvements to make it more energy efficient. I have also done extensive work on the yard.

I chose the mobile home option because I enjoy gardening and like to produce some of my own food. I have worked as a caregiver in a number of the senior citizen housing options in this town. Being able to do yard work and have a garden is not an option in the majority of senior citizen housing I have seen. Also the rent for even a tiny studio apartment is significantly more than lot rent.

This home is an older mobile home and I do not believe it would be able to be moved. Your estimate of \$7,000.00 to attempt to move it may be "low" to you but it is not "low" to me.

After having done all this work to salvage this home, having to "abandon" my home simply because of the greed of some developer, seems like a cruel and inhumane act on the part of anyone who might be involved in such an action.

Janet Toone

From: [Sharon Doyle](#)
To: [Alice Price](#); [Sanford Sandy Gerber](#); [F Kendrick Gwinn](#); [Nathan](#)
Subject: Fwd: Trailer Park Nation: A Special OZY Series
Date: Sunday, May 10, 2015 10:35:16 AM

This is an interesting series of articles on mobile homes (although mostly featuring what I would call trailer parks). I found out about it when my friend Alice Price told me a special report was on PBS on Friday night.

I especially find it interesting because of all the national coverage this is getting. I hope this is good news for the industry as a whole and for little ole' us on a more local level.

Sharon

----- Forwarded message -----

From: **OZY** <[\[REDACTED\]@ozy.com](#)>
Date: Sun, May 10, 2015 at 3:05 AM
Subject: Trailer Park Nation: A Special OZY Series
To: [\[REDACTED\]@gmail.com](#)



Trailer Park Nation

An OZY special series on a fast growing but troubled market

In this eight-part multimedia series, OZY explores the hidden world of America's trailer parks, and the 20 million Americans who live in them. Seven years after the financial crisis, the mobile home market is one of the fastest growing in the country — and also one of the most troubled. At a time when the American Dream is defined by homeownership, what does it mean to own a mobile home? Or to spend years trying to own one?

**What HUD Secretary Julián Castro
Thinks About Mobile Homes**

**The Travails of Shopping for a Mobile
Home**



In this segment of an OZY exclusive, Julián Castro talks trailer parks.

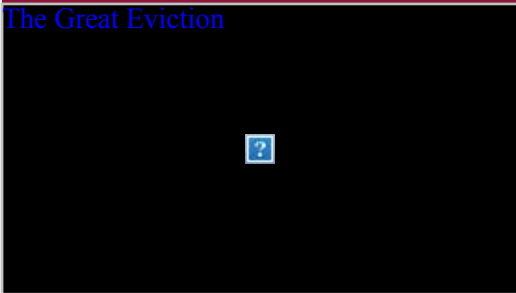
[Teresa Distel](#)



Buying this sort of house is unlike any housing hunt you've ever endured.

The Great Eviction

[The Great Eviction](#)



Every homeowner deserves more protection than a lemon law.

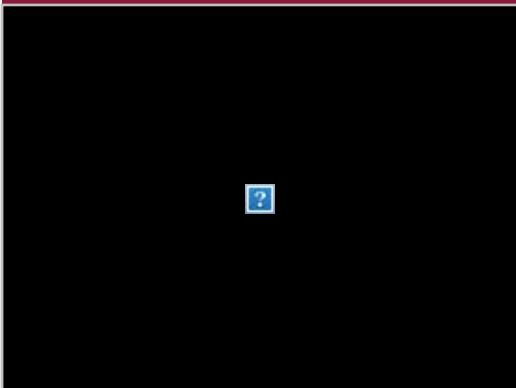
The Trailer Parks of Silicon Valley

[The Trailer Parks of Silicon Valley](#)



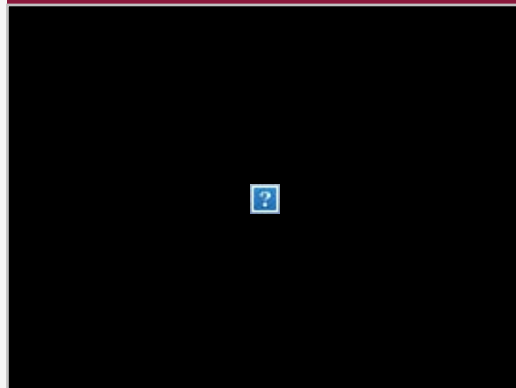
This is a side of the tech world you've probably never seen.

Some Surprising Good News for Millennials



There are ways to hack even a rough housing

Taking the Wheels Off the American Dream

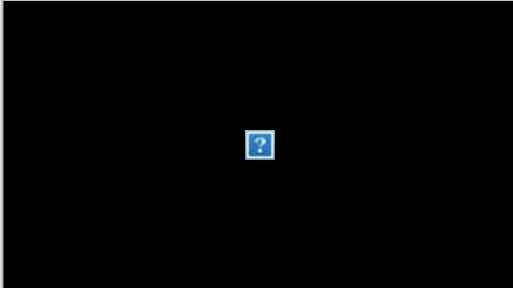


When did living simply, sustainably and within your

market.

means become such a bad thing?

An OZY Video Portrait of a Family



The Richmonds are three faces in 20 million.

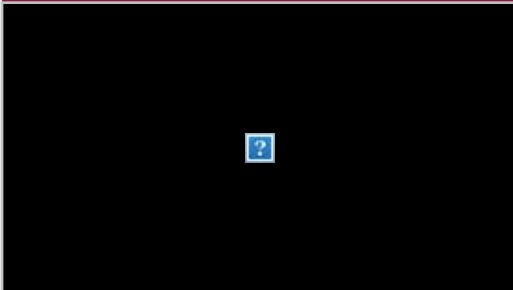
Like Us on Facebook

[The Trailer Parks of Silicon Valley](#)



Life is better when you share.

Should Tiny Homes Replace Mobile Homes?



Few people consider trailer parks sexy. But another incarnation of the mobile life offers a hip alternative.

When Home Sweet Home Is a School Bus

[When Home Sweet Home Is a School Bus](#)



Their house may not be a house, but it is far cooler than yours.



[Unsubscribe](#)

This message sent to [redacted] [@gmail.com](#) by [redacted] [@ozy.com](#)

OZYMANDIAS

800 El Camino

Mountain View , CA 94040

[www.ozy.com](#)

[Manage](#) | [Update Profile/Email Address](#) | [Forward To A Friend](#) | [About This List](#)

From: [Sharon R Doyle](#)
To: [Gwinn, Nathan](#)
Subject: What HUD Secretary Julián Castro Thinks About Mobile Homes
Date: Sunday, May 10, 2015 9:43:43 AM

I thought this was interesting. On Friday evening PBS news did a report on mobile homes. It mostly focused on the Southern part of the USA and really trailer parks rather than mobile home parks. It did point out how people were moved out of their homes on very short notice.

Most people here in Spokane do not live in the traditional trailer park. We are lucky. In WA we also have a one year notice to vacate. However, we don't feel secure in our situation and realize that the homes we have fixed up and cared for and made homes for our future of have a fragile existence in terms of long term prospects.

Just saw this and thought you might be interested in the fact that dislocation is a nationwide problem, not just a local one.

Sharon Doyle

Because the world of trailer parks isn't so disconnected from your own rent or mortgage bill.
<http://www.ozy.com/pov/what-hud-secretary-julin-castro-thinks-about-mobile-homes/60264>

5/5/15
WL

From: Winnifred L. Walters [REDACTED]@me.com
Subject: Policy re Manufactured & Mobile Home Parks Z1400065COMP
Date: May 3, 2015 at 2:35 PM
To: ngwinn@spokanecity.org
Cc: tblack@spokanecity.org

RECEIVED

MAY 11 2015

PLANNING & DEVELOPMENT SERVICES

Dear Mr. Gwinn,

My name is Winnifred Walters, I am 91 years old, I live in the Sans Souci West mobile home park at 3231 W. Boone Ave. #915.

I have lived here since September, 2004, and hope to remain until I die. I chose to live here after my husband died because I needed to downsize and I like good close neighbors but not as close as a retirement home. Also expenses are diminished along with diminished income.

So I own my home but rent the land. Please consider the options which provide profitability for the land owners while maintaining the standard of living I now enjoy, the financial investment I have in home ownership, as well preventing the disruption and upheaval in my life if I were to be told that I had to move.

We need a win/win situation. Thank you for your attention and good work.

Winnifred L. Walters
[REDACTED]@comcast.net
509 448 2143

P.S. I would address this to tblack also but do not know if black should be addressed as Sir or Madam.

Sorry! lost the letter on computer so here
is email via snail mail!
Winnifred Walters

From: [Adolph Suhr](#)
To: [Gwinn, Nathan](#)
Subject: policy re Manufactured & mobile home Parks Z1400065COMP
Date: Monday, May 11, 2015 1:01:40 PM

Dear Mr. Gwinn

I am writing to express my support for "Policy re Manufactured & Mobile Home Parks Z1400065COMP". We live at 6805 N. Crestline Ave. in Millers +55 Mobile Home Park. We just became aware of this policy and are very concerned that the park could be sold and we would have to relocate.

Our previous home was a manufactured home and we loved it so we were open to another such home. We moved here because the park is well kept, the homes are nice and affordable, it has Block Watch, and we feel secure. All our neighbors watch out for each other so our own families don't worry about us.

The community benefits because this park is pleasing to the "eye". We have certain restrictions to abide by regarding animals, vehicles, garbage, and upkeep of our property. We are in our 80's and planned on this being our last move. To be relocated would be a real hardship physically and financially.

Sincerely
Adolph Suhr
6805 N. Crestline, # 13
509-953-5766
[REDACTED]Gmail.com

Mr. & Mrs. Wm. C. Marlowe
3231 W. Boone #104
Spokane, WA 99201
[REDACTED] [msn.com](mailto:[REDACTED]@msn.com)
509-536-6294

RECEIVED

MAY 19 2015

PLANNING & DEVELOPMENT SERVICES

Planning and Development Services
Attn: Nathan Gwinn, Asst. Planner
808 W. Spokane Falls Blvd.
Spokane, WA 99201-3329

Mr. Gwinn - RE: RESOLUTION 2014-0103

We have lived in the park now for six months. Our ages are 63 (Bill) & 71 (Sara); we chose to move here as we had looked at several retirement communities in Spokane, but were unable to find one that we could actually afford. Most of them are out of our financial reach. We plan to retire within the next few years and are indeed hoping to "age in place" and stay here for a very long time. After researching other retirement communities, this one offered the best blend of: Affordable housing; reasonable Park Fees; allowed us to keep our pets and it is close to our work place (CCS) and our church. Being here, we can still afford our medical, cars, insurance, and groceries.

In terms of security, we feel very safe here as we are a gated community: where we look out for one another, care for those who have disabilities; the community is very tight knit and helpful. Since moving here, we have noticed the proximity to downtown, general services and of course, entertainment (theatre concerts, the arena, etc.). There is a bus route should our cars need repair, and it is beautiful to be amongst the trees and a short walk to the beautiful river. Although we are still working and very active in Spokane, we are beginning to join our Sans Souci community in various activities. It is very comforting to have neighbors who care and are genuinely concerned about you. The fact that we have a pool, a fitness center, classes, dancing and card games is reassuring as we will eventually reach a point where we will find solace within the community, rather than without.

I must say that having grown in Florida (Sara) and living in Hawaii, I have seen developers coming in and dispossessing those who cannot afford or are unable to move, due to financial situations or simply their age. To me, and I'm sure to my husband who grew up in Arizona would agree, that we chose this place as where we want to spend the rest of our natural born days. We cannot afford an assisted living facility and are not interested in being displaced. We have no children or siblings to take us in and would prefer to stay here in the Pacific NW than move some place where costs are prohibitive or the weather not pleasant. I sincerely hope this explains our situation and I'm sure that the 200 or so residents here would agree. We came here to spend our days quietly and happily as we live out our lives; surely you do not intend to disrupt this natural process for us.

Please consider the humanitarian side of these zoning laws and respect the choices that we have all made in choosing San Souci West, which by the way, means "Without sorrow" in French.

Sincerely,
Sara Edlin-Marlowe
William Craig Marlowe

Sara Edlin-Marlowe
Wm Marlowe



MANUFACTURED HOUSING COMMUNITIES OF WASHINGTON

509 12th Avenue SE, Suite #7, Olympia, Washington 98501
(360) 753-8730 • Fax (360) 753-8731 • 1-800-345-5608

We Are Affordable Housing

Mr. Nathan Gwinn,
City of Spokane

RE: Proposed Manufactured Home Park Preservation Policy

Manufactured Housing Communities of Washington (MHCW) is an association of primary providers of privately financed affordable housing in the state. We take pride in our history of supplying non-government subsidized affordable housing. And now we honestly wonder why the City of Spokane has chosen to single us out for attack.

Everyone agrees there is a need for affordable housing. And though our MHCW member communities represent a good source of housing for low-income tenants, not all tenants in manufactured housing communities are low-income. Our communities have a large percentage of retired individuals, but by no means are they all elderly or poor. We are proud to be affordable to those that need housing, but we bear no particular societal duty to provide low-income housing. If providing more affordable housing is a worthy public policy goal, and it is, should not everyone share the burden? What is Spokane's record of creating affordable housing at no cost to taxpayers?

MHCW is disappointed to see Spokane consider applying the concept of exclusive zoning to manufactured housing communities (MHC's). We hope the City will rethink the so called "Park Preservation Policy" and instead revisit a general fairness doctrine that recognizes the need for affordable housing is the responsibility of society as a whole.

Never mind that private property owners in the free market had taken the economic risk, invested their own savings and coupled it with their own sweat equity, and provided your city with affordable housing at no cost to the city or its citizens. The proposed zoning endorsed by self-appointed resident representatives is a short sighted solution to a problem caused by unforeseen consequence of growth boundaries. A government takeover of private property by zoning restriction is a strange payback to the entrepreneurial community developers who have provided hundreds of housing units for decades in your city. What is Spokane's record on applying permanent restrictive zoning to other private property owners?

MHCW opposes Spokane's proposed exclusive zoning for manufactured housing communities. These efforts are direct assaults on the property rights of community owners. I ask that you take a few moments to look over the comments that became so

called "Policy considerations related to MHPs" when Federal Way originally bought into unsubstantiated claims of those who want to freeze communities in an unsustainable world of make believe.

Once Federal Way heard real world input that trumped the half-truths and unsubstantiated claims they thought had credence, they took a step back. They will now take a closer look at all claims through a series of stakeholder meetings. Claims by any participant will have to stand up to a more thorough vetting process than a simple repeating of oft cited but false claims. Please see the attached document titled "Planning Commission Study Session." I thank you for your time and consideration.

Sincerely

A handwritten signature in black ink, appearing to read "Ken Spencer", written over the word "Sincerely".

Ken Spencer
Executive Director, MHCW
ken@mhcw.org
360-753-8730 w
425-747-8750 h

Planning Commission Study Session

Policy considerations related to MHPs

- Mobile homes and manufactured homes are considered affordable housing. Adopting a MHP zoning designation could help to preserve existing affordable housing.

Redevelopment could create many times the number of affordable housing units.

- When parks are converted to other uses it can be difficult to find another space if a park closes.
 1. If so, it is due to the elimination of new communities by restrictive zoning under the Growth Management Act.
 2. The City's Planning Commission Study cites the State Relocation Fund and the Relocation Assistance program, both specifically aimed at helping residents relocate.
 3. For one group to be even further singled out for special treatment could raise concerns over violating Section 12 of the State Constitution, which states:

"No law shall be passed granting to any citizen, class of citizens, or corporation other than municipal, privileges or immunities which upon the same terms shall not equally belong to all citizens, or corporations."

- Once a manufactured or mobile home has been placed on a lot, it no longer is mobile and it is costly to move the home to another park.

Not true, homes are movable and many are moved. (See "Zoning Issues" paper)

- Some homes that are displaced are older, single-wide models that can be difficult to relocate because of restrictions placed by park owners.

Actually cities have far greater impact on homes allowed than the average community owner. Many older communities are threatened with closing by cities that will not allow older replacement homes, or indeed newer communities to be built.

- There have been no MHP closures within the City of Federal Way during its 25-year history.

So why is there a push for restrictive zoning?

- Restricting existing properties developed as MHPs to remain only as that use may affect the value of said properties and could potentially be considered a taking, depending on how restrictive such a provision would be.

Why must the community owner bear the burden alone? If society determines subsidized affordable housing is good public policy, and it is, shouldn't the burden be shared by all?

From: [Brenda Bailey](#)
To: [Gwinn, Nathan](#)
Subject: Manufactured Home Comprehensive Amendment
Date: Wednesday, May 13, 2015 1:07:38 PM

Hello Nathan,

My name is Brenda Bailey, I am the president of the Cascade Community Homeowners Alliance for Cascade Manufactured Home Community. I am writing to you on behalf of our HOA.

I was going to present testimony at the may 13th workshop, but it has been postponed and I understand that you still need letters of support by this Friday.

According to the 2012 census approximately 20 million people live in manufactured housing, which makes up 6.4% of US housing. Traditionally these residents are low income and senior citizens. The American dream of owning a home shouldn't be any less important based on the fact that you don't own the land underneath the home.

People who live in manufactured housing are stereo typically labeled as uneducated, low income and elderly. Many are easily prey upon by unscrupulous land owners. They fall victim to some unethical business practices by landowners because they are afraid to stand up for their rights, in fear that they could be evicted.

Many landowners in Spokane have verbiage on their lease that states, they can sell, transfer, or close the manufactured home park at any time. This is a constant worry for many homeowners who financially cannot afford to relocate. In some cases you are not only forced to move, you may also be required to have your home destroyed at your expense. In our park the threat of the land being sold would displace 286 households. Out of the 286 homes that could be moved, where would they have to relocate to? Where is there another park or parks that could handle that influx of homes?

Landowners make a decent profit from these parks and we need strict guidelines/ laws in place to prohibit them from further profits if it causes someone to lose their home. Landowners should be required to pay relocation costs or disposal costs in the event that they decide to sell the land.

At the April 15th open house at City Hall, I was approached by the President of the corporation that owns our park. He informed me that he does not support this proposal and that he has an open checkbook that he will use to fight this all the way. I asked him if we could meet and try to brainstorm idea's that would make this a win/ win for everyone, he

declined the offer. He further stated that he should not have to ask for permission to sell his land. Along those same lines - I should have control of if and when I want to move! Not when some one needs to make a higher profit margin!

Unfortunately for our landowners, I am the exception to the rule in this park(not uneducated, low income, or elderly). I do not take kindly to a corporation trying to bully elderly homeowners with their bank account. For 25 years this corporation has been taking advantage of the homeowners in this park and has refused to do business in compliance with Washington State laws in addition to local laws. This zoning proposal would not only give homeowners a peace of mind, but it will also hold landowners accountable for unethical business practices.

Thank you for your continued support of preserving our homes on leased property.

Regards,

Brenda Bailey
President -Cascade Community Homeowners Alliance
2311 W 16th Ave Lot 101
Spokane, WA 99224
509.456.7148



Planning & Development Services
Attn: Nathan Gwinn, Assistant Planner
808 W. Spokane Falls Blvd.
Spokane WA 99201-3329

May 14, 2015

Re: Application/Permit Number: Z1400065COMP

To Spokane Planning Commission;

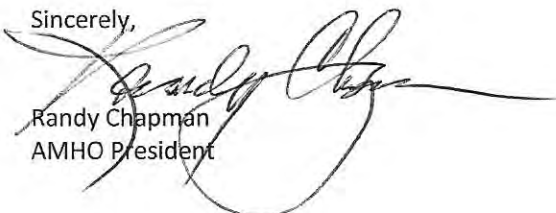
The Association of Manufactured Home Owners (AMHO) a State-wide nonprofit membership based organization for those who own their homes but lease the land under them would like to submit this letter to the Planning Commission in support of zoning for mobile/manufactured home communities that are located within the City of Spokane. The 1,100 households, who call their manufactured housing home, do so because they wish to live within their means. These homes are the largest asset the homeowners possess and though some are not worth a great deal they are still home. Many of the communities in the City have a club house or other amenities that foster a caring community of residents where the close proximity of the homes to each other give the residents a sense of security and an appreciation that neighbors helping neighbors is a good way to live.

AMHO supports and promotes the idea of creating Home Owner Associations (HOA's) as a way to interact with neighbors, be made aware of the laws (RCW.59.20) governing manufactured home communities and learn to take appropriate action when community rules are either broken or ignored by management or other residents. AMHO also encourages HOA's to register with the Secretary of State and become incorporated within the State so that, should the situation arise, the home owner can purchase the community from the owner/seller and continue to operate the community as a nonprofit co-operative.

Not only does AMHO want to see affordable housing remain viable for owners of manufactured homes but we want to make sure that City and county Comprehensive Plans continue to meet, or exceed their affordable housing goals as mandated by the law.

Manufactured home ownership on leased land remains the only source of affordable non-subsidized home ownership in the country today. Please vote to maintain this home ownership option for seniors on fixed incomes and for young families just starting out on the home ownership ladder by-creating zoning ordinances that would include existing manufactured housing communities and the future development of other communities in the City of Spokane.


Sincerely,


Randy Chapman
AMHO President

From: [Robert Cochran](#)
To: [Gwinn, Nathan](#)
Subject: argument against mfd housing zoning
Date: Thursday, May 14, 2015 8:49:35 AM
Attachments: [Zoning not the Answer.pdf](#)

Nathan Gwinn, City of Spokane,
Spokane Plan Commission,

See attached argument against the proposed amendment to the comprehensive plan that would open the door to restrictive zoning of manufactured housing communities in Spokane.

Robert Cochran
 [mac.com](#)
Contempo Spokane MHP

Restrictive Zoning for MHC's is not the Answer

Robert Cochran, Manufactured Housing Communities of WA member

There is a movement by a tiny percentage of manufactured home owners who live on rented land within manufactured housing communities. The goal of the movement is to have every municipality enact restrictive zoning so that a business designated as a manufactured housing community may not change its use. The playbook they go by, published by CFED, (the Corporation for Enterprise Development, a 501c- 3 public charity) argues many ways tenant-homeowners can give themselves rights to the land through zoning.

What is the problem in the first place that needs a solution? To hear the tiny percentage of homeowners who want more security for themselves on rented land, the problem is that there exists a possibility that the owner of the land may want to exercise their property rights and do something else with the land. As it stands now in Washington law, a homeowner who rents a space in a manufactured housing community can do so with many protections, practically forever, if they pay the rent and abide by the terms of their rental agreement. But a landlord can choose to close the community and do something else, if the homeowners are given a 12-month notice. They want to remove this choice.

The problem according to the likes of Association of Manufactured Home Owners (AMHO of WA, a 501c- 3 public charity) is that the homeowners need "security of tenure", meaning the homeowners need permanent rights to the land, as if they own it. Rather than buy their own land to locate their homes for such security, AMHO believes changes in law and zoning should be sought to virtually eliminate land owners' property rights in order to gain that "security of tenure". Remember, 70% of all manufactured homes in the U.S. are located on private land the homeowners control.

Why are people allowed to rent land for the homes they own? It is simply based on the fact the homes can and are designed to be moved by virtue of having their integral frames for support. If manufactured homes were not moveable, no one would rent land for them.

For some manufactured home owners, the allure of renting land within a community of like homes provides them desired benefits at the cost of not owning the land. People choose to rent land for many reasons, most often it is to save money. They can also choose to move their home elsewhere if circumstances change. There is a trade-off of property rights for the unique benefits manufactured housing communities offer, one of which is affordability.

Lenders who finance purchases of manufactured homes are fine with the homeowners renting land in manufactured housing communities. Just like manufactured homes on private

land, the lenders know they can repossess the homes from rented land if the need arises. Many manufactured home dealer lots have "repo" homes for sale that were removed from their home site locations.

Manufactured homes are designed to be structurally sound on their own frames. They are moved once or twice from the factory to dealer to home site. They can be moved again if needed. According to the US Census data, 1 in 5 manufactured homes have moved at least once from their original location. Age of the home does not affect the ability of the home to be moved.

AMHO likes to state that "Only 1 in 100 manufactured homes ever moves [or is relocated]". I do not know if that statement is backed by statistics, but I do know that is a false logic argument to say manufactured homes cannot be moved. What if I tell you that "Only 1 in 100 fire extinguishers is ever used to put out a fire"? Does that mean the 99 in 100 are incapable of being used to put out a fire? How often manufactured homes are relocated does not preclude them from being relocated.

Some advocates speak of homes that are too old to be moved, or say what if a home cannot be moved? Yes, what if? Are there such homes anywhere that expert movers looked at and said, "Let's just walk away from this one, it cannot be moved."? There are no real life examples or data forthcoming from those who make such claims that some homes cannot be moved.

And let me emphasize something: if a manufactured home, or mobile home, or trailer home, is thought to be incapable of being moved or will not survive a move, what does that say of its condition and suitable inhabitability? AMHO has never expressed concern about the quality of life homeowners experience in old, broken down, obsolete mobile homes.

The average tenancy of a person who lives in a manufactured housing community is 7 to 8 years. Yet homeowner advocates are seeking to establish permanent rights for the manufactured homes themselves on the rented land at the expense of the landowners' property rights.

AMHO and others like CFED have a blasé attitude toward property rights and the implications of denying freedoms of property owners our country was founded on. No one loses their manufactured home if the home is required to relocate. The personal property of the homeowner is not taken away. The homeowner only loses the place where the home was if a community closes. Whereas, the landowner loses valuable basic property rights if zoning is passed to restrict the use of the land to remain in the one business that was freely chosen many years earlier. In losing the rights to determine the preferred use of one's private property, the landowner may very well suffer economic loss as well in the future.

There is no need, nor is it the right thing to do, for restrictive zoning of manufactured housing communities to be put in place.

From: [Carolyn Doyle](#)
To: [Gwinn, Nathan](#)
Subject: Zoning Resolution
Date: Thursday, May 14, 2015 11:53:13 AM

My name is Carolyn Doyle and I live at Sans Souci West Mobile Home Park in unit #703.

I moved here nearly 3 years ago with the help of my family in buying my own home. I am only 50 years old but am permanently disabled and live with my service dog. My mother lives nearby in the park and is happy I am here so she can feel I am safe.

Before moving here I lived in subsidized housing provided by the SNAP program. I qualified based on my income which was my military widow's pension. I paid \$400 a month for a small apartment in a 12-unit building just east of Division Street on 2nd Avenue. I chose this apartment because it had an external entrance and a small area nearby for my dog.

I lived there for 2 years. Over that time the apartments became more and more scary. There was a lot of drug dealing there. The violence level increased and the police were always there. Sometimes abused women sought shelter in my apartment. I became afraid to go outside at night with my dog.

I am very happy here at Sans Souci. The community has welcomed me and my dog. I have a fenced yard for her to go out in. I feel safe and am glad to live in such a pretty place. And I am able to pay my own rent with my pension.

I would like to stay here forever.

Sincerely, Carolyn Doyle, Sans Souci West Unit 703

From: [BRIAN CONNIE STOLZ](#)
To: [Snyder, Jon](#)
Cc: [Gwinn, Nathan](#); [REDACTED]@yahoo.com
Subject: Zoning proposal for manufactured homes
Date: Thursday, May 14, 2015 12:14:24 PM

Dear Mr. Snyder and Mr. Gwinn,

We are writing to you at the encouragement of Brenda Bailey, the president of the Cascade Homeowner's Alliance at the Cascade Manufactured Home Park in Spokane. We are residents of the Cascade park and have been for about two years. We bought a home in the park to serve as our retirement home, and have put a lot of time and money into our home since we moved in. The park is a great place to live with as many, or as few, amenities as residents care to take advantage of. It is well maintained and provides a wonderful environment for retirees, like us.

Our concern is that, without modifications, the current zoning laws on the books could create a major financial hardship for our friends and neighbors that live in the park with us. It would also disrupt our lives and our plans for a carefree and affordable retirement. At this point in our lives, we don't want to have to worry about having to relocate our home in the event the corporate owner's decide to sell the land the park sits on, without some guarantees of fairness with respect to time and financial issues.

Most of the people that call the Cascade park home are elderly and on fixed incomes. We do not have the financial resources to simply pack up our home and move it with little notice. If the owners of the Cascade park were to decide to sell the land it sits on, the other issue would be where, in Spokane, would we find over 200 manufactured home sites ready to accept the influx of moved homes? To our knowledge, there are no other parks large enough to handle that kind of increase in the number of new residents, or enough other parks to simply handle moving a few here and a few there.

Some of the issues we would like to see addressed in a new zoning ordinance would include, but not be limited to, the following:

1. Make the land owner provide documentation, prior to entering an agreement to sell, that shows their profit and/or loss

from operating the park as a business. If they are already making a profit (and we are quite sure it's a tidy sum already),

then they should not be allowed to sell the land without making concessions to help the low income residents relocate.

Relocation costs could include, but not be limited to, the fees to actually move a home to an acceptable location - OR -

the cost of demolishing a home deemed by statute to be too old to move.

2. Increase the time frame the owner is required to give residents that the owner is selling the property from the existing

1 year limit to something more generous, like 18 months or even more. After all, federal, state, and local

governments all routinely spend at least that amount of time conducting studies to decide the most mundane topics.

Why shouldn't the taxpayers that live in manufactured home communities be given the same courtesy and be given more time?

3. Increase the amount of land available in Spokane county for the express purpose of manufactured home living. It is

our understanding that 49 mobile home parks have been closed since 2007 in Spokane county. If we are faced with the possibility of having to relocate, where will we go?

4. Since downsizing and retiring, our household income has decreased by about 70%. Although we can afford to live the

way we do in a manufactured home park, our annual income now qualifies us as low income, and probably poverty

level, or close to it by national standards. We are truly low income taxpayers and due consideration for us and our

neighbors is warranted. Low income and elderly taxpaying citizens need some protections to make certain our homes

are secure from unscrupulous developers or the lure of the chance to make big money at the expense of those citizens.

Please feel free to contact us if you have any questions or comments.

Brian & Connie Stolz
2311 W. 16th Ave #98
Spokane, WA 99224
(509) 328-2727

From: [Sharon Doyle](#)
To: [Gwinn, Nathan](#)
Subject: Zoning Resolution
Date: Thursday, May 14, 2015 1:09:57 PM

Good morning Nathan. Here are my comments for the Planning Commission as requested.

My name is Sharon Doyle. I live at Sans Souci West Mobile Home Park, Unit 11

I have lived here since 2006. I never thought I would leave my 10 acres for a mobile home park but I was wrong. At my age it got very difficult to maintain my efforts to keep things going. And, I felt isolated. Anyway a friend told me about Sans Souci West and referred me to a friend of hers who lived here.

I was very impressed with the location of the park, the way it was maintained and the people who lived there. I knew I would have to pay cash for my home as it is pre-HUD and not eligible for a mortgage. I didn't think of the purchase the same as I would have when buying a stick-built residence. I was, however, very reassured by the fact that the Shriner's had owned the park since it was acquired from Natatorium Park back in 1970. I wasn't thinking of appreciation but of long-term living in a nice place that I could afford on my moderate retirement income.

I didn't know about HUD at that time. My unit passed inspection and I moved in. I then found out that pre-HUD homes have a lot of problems. I set about to update my 1971 double wide to HUD-like standards of energy saving and safety levels. I have done this over the years. However, my unit can never be classified as a HUD unit no matter how much I upgrade. It cannot be relocated either because I have made too many revisions and upgrades. Turns out "mobile homes" are not so mobile after all.

I am not looking for appreciation on my home. I am looking to stay in my home, "aging in place" as they say, for a very long time.

I have never lived in a "community" like this one. Most people are over 55-years-old. They are active and participate in all the opportunities available here at our park. Swimming pool, gym, card games, socials and lots of dinners, etc. We can also have our dogs with us in our own fenced yards. People care for each other here. We live in a gated community and everything is done to make us safe in our own homes. We plant gardens and build decks and outbuildings - just as if it were a "real house". We have great landlords. The Shriners take very good care of the park as they have for many, many years.

BTW we are appraised and taxed as Real Property as if we owned the land our homes sit on. And, contrary to the belief that the value of "old mobile homes" decreases, our Property Tax assessments rose this year to 400% and more on some units. So, we must not be depreciating at all.

I hope you will support this zoning issue to preserve and protect our affordable housing here in the City of Spokane.

Thank you, Sharon

--

From: [Ron Sperber](#)
To: [Gwinn, Nathan](#)
Subject: Policy re Manufactured & Mobile Home Parks Z140065COMP
Date: Thursday, May 14, 2015 2:06:05 PM

I am a tenant in Sunny Creek Residential Community located just off HWY 195 and Spokane/Cheney Rd. I attended your informational meeting at Cascade mobile home park a few weeks ago. I appreciated you taking time to come and inform us about the approach the city planning commission is taking towards the effort to provide zoning for Manufactured/Mobile homes in the city of Spokane.

My wife and I have lived at Sunny Creek for 15 years and love our community and being part of the city. We moved here from Cheney where I was an administrator at EWU. After a career in the military and at EWU my knees told us the we needed a one level home. I invested over a \$100,000 in my new home and love our country life style in this beautiful community in the city of Spokane. Our community location gives us 5 minute access to down town Spokane, 10 minutes to the airport, 14 minutes to Fairchild Air Force base and 6 minutes to one of our great hospitals. We are a community of 91 homes and we are 95% senior citizens. We help our neighbors as needs arise, we have strong Rules and Regulations which has resulted in a beautiful, friendly, secure, and peaceful place to live our remaining years. The main benefit we have here is that we look out for one another.

Our homes are either double or triple wide homes. My home has about 2000 square feet of living space, sitting on cement slabs, with a city coded/foundation garage in the front of my home. We are as permanent a home site as any stick built home around us. We lease the land from our landlord and with the beautiful homes that exist here we have improved the value of the landlords property. We pay city taxes on our homes and taxes for the landlords property.

It would be unconscionable for this property to be considered for any thing but a manufactured home community. The cost for relocating our homes, should the landlord change the property's purpose as originally designed, would be so excessive that most of us would have to walk away from our homes and our investment. We need the city to step up and provide zoning so that we can have peace of mind with where we live, help protect our investments, and insure a steady tax flow for the city. Most of us are retirees and our average age is between 69-88.

I understand that a landlord has the ability to request a rezone if their land is no longer economically viable. In our case the landlord has got the best investment going for them. They are making a considerable profit.

I would appreciate your favorable consideration of Manufactured/Mobile home zoning for the city of Spokane.

To back up my comments above I would like to invite you and members of your commission to come to my home and community so I can show you the necessity for zoning communities like ours.

Respectfully:

Ron & Virginia Sperber
4502 S. Sunny Creek Cir.
Spokane WA. 99224

(509) 624-3059

 comcast.net

From: [Black, Tirrell](#)
To: ["Jon \(Jack\) Oyler"](#)
Cc: [Gwinn, Nathan](#)
Subject: RE: MHP zoning preservation act
Date: Friday, May 15, 2015 8:10:32 AM

Mr. Oyler,

Thank you for taking the time to send your comments on the proposed text amendment. They will be included in the public comments to the Plan Commission and your name will be added to the interested persons list.

Sincerely,

Tirrell Black

City of Spokane | Assistant Planner

509.625.6185 | fax 509.625.6013 | tblack@spokanecity.org | spokanecity.org

I currently reside at Sans Souci West in space #10. My research indicates that moving a trailer to anywhere in the city or county of Spokane would be very costly, thousands of dollars, even if I can find a place that would take an older mobile home, regardless of the condition. I doubt that I could meet the financial, physical and various permits and legal challenges to make such a move. Losing the equity in my mobile home would deal a serious blow to my financial status, leaving me with very few, if any, options for housing. Unlike a home on land, I cannot sell this trailer if and when we EW notified to vacate within a year, as any buyer would have to pay more to move it than it is worth. I have kept this little home up to safe and even pleasing standards, but that will not effect the outcome. And, unlike renting an apartment or home, I cannot just pick up and leave the trailer behind.

I have read the report submitted by the park owners. Sections of their data and conclusions are suspect at best, and grievously misleading in other areas. I can support that statement with well documented facts if that would be helpful.

Sincerely,

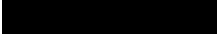
Jack Oyler

From: [Nan Powell](#)
To: [Gwinn, Nathan](#)
Subject: Policy re Manufactured & Mobile Home Parks Z140065COMP
Date: Friday, May 15, 2015 11:08:00 AM

Dear Mr. Gwinn,

I am writing to express my support for Policy re Manufactured & Mobile Home Parks Z140065COMP. We live at 2311 W 16th Ave #275, Spokane, Wa 99224 and we are a home owner. We have lived at Cascade Manufactured Home Park for the past 15 years. We moved here to downsize and eliminate yard work. Since we purchased our home we have added a \$10,000 bedroom/office, completely mudded and painted the interior, installed new carpet and laminate flooring in the kitchen, living and TV rooms and a great deal of work on the landscaping. We would not care to loose the equity we have in our home at this time.

Thank you for your interest.

Dave & Nan Powell
2311 W 16th Ave # 275
509-456-6661
 [comcast.net](#)

May 15, 2015

VIA U.S. MAIL and E-MAIL: ngwinn@spokanecity.org

Mr. Nathan Gwinn
City of Spokane Community Development Department
808 West Spokane Falls Boulevard
Spokane, Washington 99201

***RE: Manufactured Home Policy - Z1400065COMP
Comments from Sans Souci West***

Dear Mr. Gwinn:

We are counsel to Shrine Park Association, Inc., ("Shrine Park") the owner of Sans Souci West Mobile Home Park ("Sans Souci"). Shrine Park is a Fraternal Business Society organized under Chapter 24.24 RCW that supports the El Katif Shrine. Shrine Park opposes the adoption of the City of Spokane City Council's proposed comprehensive plan text amendment that declares the City of Spokane's policy (the "Policy") to designate and protect manufactured and mobile home parks in perpetuity.

A. SANS SOUCI PROPERTY HISTORY AND USE.

Sans Souci is situated in the West Central neighborhood at the western terminus of Boone Avenue along the banks of the Spokane River commonly identified as the former Natatorium Park. It is comprised of 212 slips for single-wide and double-wide manufactured homes for lease to homeowners over fifty-five years in age. Shrine Park acquired the property for generating income to promote the activities of El Katif Shrine and its related clubs. It acquired the property on July 1, 1967.

Many of the existing homes pre-date the adoption of the federal Manufactured Home Construction and Safety Standards Act in 1976 and are thus considered "mobile homes." These mobile homes have neared or are nearing the end of their utility and the owners have elected to replace the units with new, more energy efficient and safe models. To continue to make Sans Souci attractive to prospective residents, Shrine Park has made a number of improvements to the infrastructure of the Sans Souci for the benefit of residents including work on the streets, club house and tenant safety facilities.

B. THE CITY'S PROPOSED COMPREHENSIVE PLAN POLICY.

The City Council proposes the adoption of a twelve word policy declaring that the City should identify areas for the preservation of manufactured and mobile home parks. The Policy further identifies in its narrative that the intent is to provide for "affordable" housing within City limits and diminish the reduction of manufactured home lots due to redevelopment of existing parks. The adoption of the policy sets in motion the City's obligations to adopt regulations restricting the use of manufactured and mobile home parks in perpetuity due to the requirements of the Growth Management Act ("GMA") that City's development regulations be consistent with the City's Comprehensive Plan. RCW 36.70A.130(1)(d). The guise under which this policy is adopted is misplaced and ignores the current market realities of the manufactured housing market and the best interests of park tenants and park owners.

Before adopting this policy, the City must prepare an Environmental Impact Statement for the purpose of analyzing the probable significant adverse environmental impacts due to the potential perpetual restriction on future uses for park owners. In addition, the Policy violates the GMA because it does not promote a variety of housing types within the affordable housing segment and perpetually restricts owners' uses and enjoyment of their property. Finally, the Policy potentially implicates constitutional restrictions because it transfers the future development rights of park owners to their tenants.

C. AN ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED TO ANALYZE PROBABLE SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACTS OF THE POLICY.

The Policy represents the City's declared purpose to preserve existing manufactured and mobile home parks within the City. The GMA requires the City to prepare development regulations implementing the Policy. The practical effect of the City's decision to adopt the policy is the immediate commencement of the preparation of development regulations impacting the prospective development of manufactured and mobile home parks. In light of the freeze on future redevelopment of parks that the Policy may impose, the City should issue a Determination of Significance and prepare an Environmental Impact Statement ("EIS") for the Policy.

The State Environmental Policy Act, Chapter 43.21C RCW ("SEPA"), requires the City to review and consider environmental impacts associated with any action. A fundamental tenant of SEPA is that agencies are required to prepare a threshold determination and an environmental impact statement at "the earliest possible point in the planning and decision-making process." WAC 197-110-055(2). The "earliest possible point" is specifically defined as when:

[a] proposal exists when an agency is presented with an application or has a goal and is actively preparing to make a decision on one or more alternative means of accomplishing that goal and the environmental effects can be **meaningfully evaluated**.

WAC 197-11-955(2)(a) (emphasis added). Even greater emphasis is placed upon the preparation of an EIS to ensure that it provides "an important contribution" to the decision making process. WAC 197-11-060(5). Courts have noted that delaying environmental review has the effect of "snowballing" environmental impacts and "[d]ecision-making based on complete disclosure would be thwarted if full environmental review could be evaded simply because no land-use changes would occur as a direct result of a proposed government action." *King County v. Boundary Review Bd.*, 122 Wn.2d 648, 665, 860 P.2d 1024 (1993). When government decision "may have such snowballing effect, decisionmakers need to be apprised of the environmental consequences *before* the project picks up momentum, not after." *Id.*

The City already is "actively preparing" to accomplish a goal and the SEPA checklist prepared by the City is an incomplete analysis of the potential environmental impacts that may occur as a result of the Policy. Approximately 60 questions within the SPEA checklist contain the phrase "[t]his is a non-project action; thus this does not apply." Despite the fact that the amendment is considered a "non-project action," the City is not excused from complying with its obligations to evaluate the environmental impacts of the adoption of the policy. The impacts of the Policy are clear insofar as the City is statutorily mandated to prepare site-specific development regulations to implement the Policy that will restrain future development in existing parks. The City's narrative prepared for the policy clearly shows that is the stated purpose behind the Policy.

Moreover, it is entirely disingenuous to suggest that things like energy conservation (Section B(6)(c)), environmental health hazards (Section B (8)(a)), and housing units (Section B(9)(c)) need not be analyzed at this point simply because the action is "non-project" in nature. The Policy does not incentivize Sans Souci and other park owners to make improvements to existing infrastructure to ensure that the parks remain safe, clean and environmentally sensitive in the future. These are direct impacts accruing as a result of the adoption of the Policy.

At a minimum, the SEPA checklist must be completed so that potential adverse environmental impacts can be identified and assessed during the Comprehensive Plan amendment process. The preparation of an Environmental Impact Statement will allow the City to evaluate alternatives to forcing manufactured home park owners, like Shrine Park, to shoulder the City's affordable housing goals.

D. THE POLICY IS INCONSISTENT WITH THE GROWTH MANAGEMENT ACT.

The City's land use planning efforts are required to comply with the GMA. One of the planning goals within the GMA is that cities must "encourage" affordable housing to all economic segments and "promote" a variety of residential densities. RCW 36.70A.020. Moreover, the GMA encourages local jurisdictions to promote the use of affordable housing through incentives. RCW 36.70A.540. These incentives include, but are not limited to, bonus densities, height and bulk bonuses, and fee waivers. RCW 36.70A.540(1)(a).

The Policy is counterintuitive to the suggestions of the GMA. In lieu of encouraging park owners such as Shrine Park to invest in their facilities, the Policy encourages Shrine Park and others to maintain the status quo. It provides no incentives for Shrine Park to invest in expanding Sans Souci or attempting to provide additional affordable housing within the park boundaries because future development, and thus income potential, is restrained.

E. THE POLICY POTENTIALLY VIOLATES THE CONSTITUTIONAL RIGHTS OF SHRINE PARK.

One of the fundamental tenants of the GMA is that private property rights be protected. RCW 36.70A.020(4). The GMA also protects landowners from arbitrary and discriminatory actions. *Id.* The Policy and the potential development regulations that it authorizes, impair Shrine Park's vested property right to freely redevelop their property for alternative uses. The City's apparent reliance upon the precedence established by the Ninth Circuit is misplaced since that case was solely limited to a *facial* constitutional challenge to the regulations adopted by the City of Tumwater. *Laurel Park Community, LLC, v. City of Tumwater*, 698 F.3d 1180, 1183 (9th Cir. 2012).

The Washington State Supreme Court has been more vigorous in its protection of manufactured and mobile home park owners when the statute or regulation attempts to transfer the future development rights of a park from the property owner to its tenants. For instance, in *Manufactured Housing Communities of Washington v. State*, the Washington State Supreme Court struck down the Mobile Home Parks Residents' Ownership Act, which granted park tenants a right of first refusal when a park owner elected to sell their property as violating the eminent domain provisions of the Washington constitution. *Manufactured Housing Communities of Washington v. State*, 142 Wn.2d 347, 352, 13 P.3d 183 (2000). The court noted that the statute destroyed a fundamental attribute of ownership and had the effect of statutorily transferring that future development right to another private property, the park tenants. *Id.* at 369.

The adoption of the Policy sends the City down the perilous slope of invading the property rights of manufactured and mobile home park owners. It takes the park owners rights to future use and development of their park and conveys it to the park tenants without any form of compensation. The future adoption of development regulations will only further restrain park owners' future use and enjoyment of their property and likely will have the unintended effect of harming tenants.

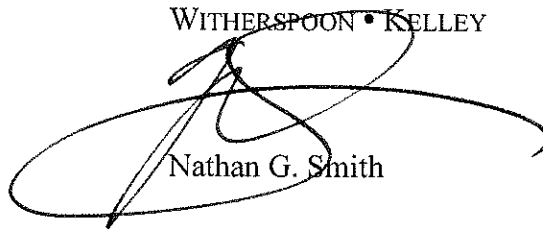
Shrine Park vigorously opposes the adoption of the Policy and believes that thorough environmental analysis and review of alternatives leads toward alternatives that are better for both park tenants and park owners.

May 15, 2015
Page 5

Should you have any questions regarding the foregoing, please do not hesitate to contact me.¹

Very truly yours,

WITHERSPOON • KELLEY

A large, stylized handwritten signature in black ink, appearing to be 'Nathan G. Smith', is written over the printed name and the firm name 'WITHERSPOON • KELLEY'.

Nathan G. Smith

NGS/kh

C: Shrine Park Association

¹ Shrine Park incorporates and adopts the comment letter submitted by Cascade Mobile Home Community as if fully set forth herein.



May 15, 2015

VIA U.S. MAIL and E-MAIL: ngwinn@spokanecity.org

City of Spokane Planning Services Department
Attn: Nathan Gwinn, Assistant Planner
808 W. Spokane Falls Blvd.
Spokane, Washington 99201-3329

***Re: Comprehensive Plan Text Amendment
Z-140065COMP***

Dear Mr. Gwinn:

This letter is submitted on behalf of Cascade Manufactured Home Community, located at 2311 W. 16th Avenue, between US-195 and Inland Empire Way. The Community contains 283 homes with a Clubhouse, Fitness Center, Heated Pool (plus Hot Tub and Sauna), Business Center, Free Wi-Fi and other amenities. It was constructed in 1970 and is age restricted to persons who are over 55 years old. Demographically, there is a wide range of lifestyles and incomes.

Cascade opposes the proposed Comprehensive Plan Text Amendment.

A. Comprehensive Plan Text Amendment. The proposed amendment states:

LU 1.X Mobile Home Parks.

Designate appropriate areas for the preservation of mobile and manufactured home parks.

The "Discussion," which is apparently a summary of the application states that manufactured and mobile home parks "provide affordable housing" and when such parks "are redeveloped, many homeowners are unable to move their homes to other sites." Such parks are generally not replaced by new parks which results in a net loss of this type of housing.

The Application actually states the following.

- "This change is necessary to protect residents of manufactured and/or mobile home parks from potential relocation as a result of landowner sales....This would add an extra layer

of scrutiny to land sales or redevelopment efforts that could displace manufactured and/or mobile home park residents."

- The proposed public benefit is described as the provision of lower income high density housing. Further, "manufactured homes also provide a community benefit in terms of efficient energy use and environmental impact."

On March 6, 2015, Planning Staff provided a Briefing Paper that addressed "Possible Future Implementation Alternatives." The following is reproduced.

If this policy is adopted, one possible next step to implement the policy is to explore creating a new zoning overlay or other designation to be applied to one or more existing manufactured home parks for preserving these land uses where it is determined appropriate. The new overlay or other designation would restrict the use primarily to residential manufactured home park use. Mobile or manufactured home parks designated in this way could only become redeveloped as another land use after going through a process similar to that required for a Comprehensive Plan amendment, which includes significant opportunities for input by those most directly impacted by the change in land use or zoning. A similar approach has been used in Tumwater, WA, and it successfully withstood a legal challenge in the U.S. Ninth Circuit Court. *Laurel Park Community v. City of Tumwater*, No. 11-35466 (9th Cir., Oct. 29, 2012). (Emphasis Added).

The likely direction would be to follow this Comprehensive Plan Amendment with restrictive zoning to include new development regulations that would freeze, for an indeterminate period, the existing use. Prior to a change of use, there will be some legislative process involving the City Council to include "significant opportunities for those most impacted by the change in land use zoning." In other words, existing property rights would be stripped away pending some process that would permit consideration of a different use.

This text amendment is designed to severely restrict present zoning in favor of conferring indefinite tenancies upon persons who own or rent manufactured/mobile homes on leased land. To the best of our knowledge, excluding a typical zone change subject to conformance with the comprehensive plan, the above described restrictions do not presently exist in the City of Spokane Development Code. Further, while the "change of use" criteria are not defined, it is presumed that a property owner would have to "prove", over the objections of tenants, that the existing manufactured park is no longer "appropriate". Instead of speculating on what the future criteria may or may not be, the following is put forward for your consideration.

B. The State of Washington Contains Extensive Regulations for Persons who Occupy Manufactured/Mobile Homes in Parks.

1. The Manufactured/Mobile Home Landlord/Tenant Act. RCW 59.20 defines the "legal rights, remedies, and obligations arising from any rental agreement between the landlord and tenant regarding a mobile home lot." RCW 59.20.040. Specifically,

- "No landlord may offer a mobile home lot for rent to anyone without offering a written agreement for a term of one year or more." RCW 59.20.050.
- The existing rental agreement of "whatever duration shall be automatically renewed for the term of the original rental agreement." RCW 59.20.090.
- The rental agreement may be assigned by the tenant to any person to whom he or she sells or transfers title to the manufactured home. RCW 59.20.073.
- A landlord may not terminate or fail to renew a tenancy except for specific stated reasons. For example, if there are substantial or repeated periodic violations of park rules, nonpayment of rent, or failure to comply with local ordinances or state laws. The Legislature has provided a landlord may, where there is a change of land use for the mobile home park, terminate the tenancy. However, the "landlord shall give the tenants 12 months' notice in advance of the effective date of such change." RCW 52.20.080(1)(e).
- The Legislature has also enacted other park protections. For example, a park owner may not transfer the duty to maintain permanent structures in mobile home parks to tenants. A permanent structure includes the clubhouse, carports, storage sheds, and other amenities provided to the park tenants. RCW 59.20.135.

2. Mobile Home Relocation Assistance. The State Legislature has provided for relocation assistance where a mobile home park is closed or converted to another use. RCW 59.21.021. Funds that are received from the state may be used for expenses related to relocation plus other expenses such as a down payment on a new lot. RCW 59.21.021(4). This Chapter also requires that notice of any closure shall include a good faith estimate of when the mobile homes must be removed, the reason for closure, and a list of names with addresses of current park tenants. RCW 59.21.030. The notice is given to the tenants and Director of the Department of Commerce.

The Legislature has also taken into consideration existence of older mobile homes to provide that such relocated homes "may not be required by any [local jurisdiction] to comply with the

requirements of any applicable fire, safety, or construction code for the sole reason of its relocation." RCW 59.21.105(2).

As shown above, the State of Washington has created a robust regulatory system in favor of tenants being able to use, occupy, and even relocate their mobile homes under reasonable economic terms.

C. The City of Spokane is Not Taking Advantage of Legislative Opportunities to Promote Affordable Housing.

1. Washington Law Allows the City to Enact Affordable Housing Incentives. Under the Growth Management Act, the City may enact or expand affordable housing programs including density bonuses and other incentives to increase the availability of low income housing for rental and owner occupancy as located in "market-rate" housing developments through the City. RCW 36.78.540. Recently, the City received a report "Addressing Spokane's Affordable Rental Housing Crisis: Policy Options for the City Council of Spokane" through a directed research project with Gonzaga University School of Law. In furtherance of the legislature's encouragement to create affordable housing incentive programs, the report presents various suggestions to the City. Such as a modification the City of Spokane Multi-Family Tax Exemption program (SMC Chapter 8.15), consideration of an Inclusionary Zoning Ordinance, which could create a set aside for affordable housing units in multi-family development to include a one-for-one unit bonus to the developer, establishment of a City of Spokane Affordable Housing Trust Fund and other adjustments to local and state programs.

Given the report, these alternatives to private property regulation should first be explored. Especially since the above programs create private opportunity through public policy incentives and allow the community at large to provide for the community need of affordable housing. In other words, instead of restrictive and oppressive zoning placed on a class of property owners in an attempt to solve a community problem, the City has the tools to promote affordable housing development through recognized programs.

2. The Cost of Housing is Affected by the Cost of Utilities. Recently, US News and World Report wrote that one in four renters in the United States use one-half of the family income to pay for housing and utilities. See US News and World Report, Associated Press, May 1, 2015, Josh Boak, AP Economics Writer. The City is the sole provider of water, sewer, and solid waste services within its corporate limits. This includes the establishment of rates, charges, and other fees for the utility services. However, the City does not offer reduced rates or waived connection charges for low income individuals to make housing more affordable.

The legislature has offered the City of Spokane a variety of incentives with regard to the cost of utilities. For example, RCW 35.92.380 allows a waiver or delay of water, sanitary, or storm

sewer connection charges for low income persons. With regard to sewer or solid waste utilities, RCW 35.92.020 allows a city to provide assistance to low income persons in connection with services which include such [income] factors that present a reasonable difference for assessing the cost of service and facilities. The same idea with regard to rate classifications of customers is set forth for water services. RCW 35.92.010. To increase "affordable housing," the City should use this state authority to help low income individuals.

3. The City May Provide Loans and Grants from its General Fund. Another statute that should be considered is RCW 35.21.685, which allows the City to assist in the development or preservation of privately owned housing for persons of low income by providing loans and grants from general municipal funds. The loans and grants can be made to owners or developers of the housing and can be used to construct, reconstruct, acquire, or rehabilitate housing to be occupied by low income persons. The loans and grants must be authorized by the City Council.

D. The State Environmental Policy Act Requires a Preparation of an Environmental Impact Statement For this Proposal. The Environmental Checklist identifies various properties that are affected by this proposal. However, no analysis is performed. The boilerplate avoids analysis by stating "this is a non-project action." Specifically, with respect to housing, public services, utilities, etc., no information is provided. Because this proposal is a significant departure from the presently existing affordable housing practices of the City, a proper environmental determination should address the proposal in relationship to existing land use plans and estimated population, housing, aesthetics, and increased demand upon public services. WAC 197-11-444.

SEPA is designed to provide decision makers with sufficient information to make a reasoned decision. *Citizens Alliance v. City of Auburn*, 126 Wn.2d 356, 362 (1995). RCW 43.21C.030 states that a city shall include in every recommendation or report on a proposal for legislation and other major action significantly affecting the quality of the environment, the environmental impact, adverse environmental affects which cannot be avoided, and alternatives. Given the sweeping nature of this proposal, the City should explore alternatives (including those identified above) through an EIS to include review of housing plans and policies adopted by the City.

F. The Tumwater Case Does Not Resolve Constitutional Taking Issues Under the City's Proposed Action. An important consideration in *Laurel Park Community v. City of Tumwater*, 698 F.3d 1180 (2012) was that the zoning district included a variety of permitted uses. And, while the Court analyzed a takings claim, the present posture of this matter does not permit an extensive discussion. However, in the context of a "taking" the Court expressed concern about the "character" of the governmental action. The Court characterized the Tumwater claim as a situation where the city forced "some people alone to bear public burdens which, in all fairness and justice, should be borne by the public as a whole." *Id.* at 1190. The Court noted the

ordinances required manufactured park owners to provide the public benefit sought when the benefit could be distributed more widely (for example, by providing relocation assistance to owners of manufactured homes). *Id.* Here, the proponents are asking the City to transfer property rights beyond those already afforded by state law. For example, on April 8, 2015, before the Planning Commission, proponents of this legislation stated they "desire security of tenure" because "closing [of the parks] is the issue."

G. Conclusion. The proposed Comprehensive Plan Text Amendment captures all rental properties within a manufactured home park regardless of whether they provide housing to low income individuals. This very broad net affects an entire park, regardless of the number of "affordable" homes.

The proposal ignores the various programs and incentives which have been made available by the legislature. Instead, the City is choosing to place the burden of solving its affordable housing goal on the backs of private property owners. This is contrary to past practices of the City.

The proposed legislation may also result in unintended consequences such as the continued use of mobile/manufactured homes, which are not energy efficient. In addition, without economic incentives to repair or replace aging homes, they will likely become substandard. The City should also consider that no surrounding community has enacted similar legislation. With RCW 59.21.105 allowing an older mobile home to be relocated due to closure or conversion regardless of the City's applicable fire, safety, or construction codes, this problem could be exacerbated. Clearly, this should not be encouraged.

It is respectfully requested that the text amendment be denied.¹

Very truly yours,

WITHERSPOON • KELLEY


Stanley M. Schwartz

SMS/kh
c: City Plan Commission

¹ Cascade, hereby incorporates and adopts the comment letter submitted from San Souci West Mobile Home Park to include all matters set forth therein.



NATIONAL MANUFACTURED HOME OWNERS ASSOCIATION

PO Box 22346 Seattle WA 98122-0346

www.nmhoa.org

Phone: 206.851.6385

Ishbel Dickens

Executive Director

(206) 851.6385

nmhoa.org

Planning & Development Services

Attn: Nathan Gwinn, Assistant Planner

808 W. Spokane Falls Blvd.

Spokane WA 99201-3329

RECEIVED

MAY 15 2015

Board of Directors

Tim Sheahan, President & CEO

Golden State Manufactured
Home Owners League

Carla Burr, First V.P.

Meadows of Chantilly Home
Owners Association, VA

Rita Loberger, Secretary

MH/OSTA (OR)

Myra Close, Treasurer

Utah Manufactured
Homeowners Group

Lori Dibble, V.P. NE Region

Manufactured Home Owners
Association of New Jersey

Paulette Cross, V.P. W. Region

Utah Manufactured
Homeowners Group

Jacki DeVore, VP Mid-West

Region

All Parks Alliance for Change

Ed Green, VP, S. Region

Florida

Anne Sadler, At-Large

Association of Manufactured
Home Owners (AMHO) (WA)

Gary Miller, At-Large

Manufactured Home Owners
Association of New Jersey

Lauren Williams,

Honorary Director

CFED

PLANNING & DEVELOPMENT SERVICES

May 11, 2015

Re: Application/Permit Number: Z1400065COMP

The National Manufactured Home Owners Association (NMHOA) is pleased to offer the following comments in support of the Spokane City Council's desire to preserve and protect opportunities for affordable home ownership within the City, especially as it pertains to the preservation of the City's 17 manufactured housing communities since they provide spaces for 1,100 home owners and their families to live in their own homes.

I believe the City's vision says it all: *"affordable housing of all types will be available to all community residents in an environment that is safe, clean, and healthy. Renewed emphasis will be placed on preserving existing houses and rehabilitating older neighborhoods."* This is exactly what zoning "mobile home parks" does. At no cost to the City, 1,100 affordable home ownership units could be preserved allowing for the long-term preservation of this opportunity for future young families just starting out on the home ownership ladder as well as allowing seniors to "age in place" since manufactured homes are single-story dwellings that are easy to maintain.

Here is the proposal under discussion:

LU 1.X Mobile Home Parks

Designate appropriate areas for the preservation of mobile and manufactured home parks.

Discussion: Manufactured and/or Mobile Home Parks provide affordable housing to many City residents. In many cases, they provide the opportunity of home ownership to households which cannot afford to purchase other types of housing. When existing manufactured home parks are redeveloped, many homeowners are unable to move their homes to other sites. Additionally, redeveloped mobile and manufactured home parks are generally not replaced by new parks within the City, resulting in a net loss of this type of housing.

Other jurisdictions across the state have done just this. The City of Tumwater was the first to enact a mobile home park zone in 2008. The City did this

The mission of NMHOA is to promote, represent, preserve, and enhance the rights and interests of manufactured home-owners throughout the United States.

through a very thorough public hearings process and invited representatives of both home owners and community owners to attend several meetings to discuss the issue. Despite, Tumwater City Council's unanimous adoption of its "mobile home park" zone after this inclusive and deliberate process, a couple of community owners and the Manufactured Housing Community Owners of Washington (MHCW), the industry group, filed suit in federal court against the City of Tumwater.

As expected, the City prevailed in 2008 when an *en banc* panel of the Ninth District Court of Appeals ruled unanimously in favor of Tumwater's ordinance. Since that time, the cities of Lynnwood and Marysville have enacted ordinances as has Snohomish County. None of these ordinances have been challenged.

Currently the City of Federal Way is also looking into zoning their communities as mobile home parks and the Association of Manufactured Home Owners (AMHO) continues to look for opportunities to encourage other jurisdictions to take similar action as a way to protect the last vestiges of affordable home ownership in a way that also allows the continued operation of highly profitable businesses – a win/win for everyone.

Preserving the City's manufactured housing communities allows the City to meet all the elements of the Housing Element in its Comprehensive Plan:

- Encourage the availability of affordable housing X
- Available to all economic segments of the population X
- While promoting a variety of residential densities X
- And a variety of housing types; X and
- Preserving existing neighborhoods. X

It does all of this while still allowing manufactured community owners to continue to operate successful businesses. Presumably the City would include a caveat in any ordinance that would provide for a way for any community owner, whose business was no longer economically viable, to come before the City Council to request a re-zone, so there are safeguards built into this proposal.

In the mid-2000s more than 50 manufactured housing communities in Washington changed their use as a result of the building boom. Over 2,000 home owners and their families were displaced, most would never be home owners again. I urge the City of Spokane to take a pro-active approach to the preservation of manufactured housing communities because once they are gone, they're gone.

Please support the mobile home park zoning ordinance.
Sincerely,

Ishbel Dickens,
Executive Director,
National Manufactured Home Owners Association,
PO Box 22346
Seattle WA 98122-0346
206.851.6385
www.nmhoa.org
www.facebook.com/NationalManufacturedHomeOwnersAssociation

RECEIVED

MAY 15 2015

PLANNING & DEVELOPMENT SERVICES

Dear Mr. Gwinn,

I am writing to express my support for Policy re Manufactured & Mobile Home Parks Z1400065COMP. I live at Sundance Meadows Community and I am a home owner. My husband and I moved here 5 ½ years ago and absolutely love our community. We are both retired and really enjoy the social aspects of living in a senior community. However, we do not own the land under our home and that is a cause for concern.

Unlike a lot of manufactured homes, ours is not really movable. It is a modular home and is attached to a concrete foundation. Many others, especially seniors, have mobile homes that can be moved. However, if you are living on a low fixed income, the cost of moving the home would not be feasible for a lot of people. Also, where would you move the home to? There aren't very many mobile home parks that have any space available. In many cases, people would have no choice but to walk away from their home and lose their entire investment.

Zoning for manufactured home communities would give home owners the added security of knowing there is some protection of their investment. It would preserve existing neighborhoods and provide a diversity of housing options by including an affordable option to people that might not otherwise be able to afford a home.

Included in the text of this zoning ordinance should be a use exception so that landlord have the ability to request a rezone if their land is no longer economically viable under the criteria established in the manufactured housing community zone.

Respectfully submitted,

Sharon D. Bishop

10426 Maximilian Lane

Nine Mile Falls, WA 99026-9278

(509) 484-2111

RECEIVED

City Planning Commission

MAY 19 2015

5-14-2015

Atten: Councilmen Jon Snyder
Nathan Gwinn

PLANNING & DEVELOPMENT SERVICES

This is my reason for wanting to be able to stay here at Cascade
Manufactured Home Community.

My husband Lee Beaman and I (Delores) moved here in 2001.
We bought #250, & proceeded to improve it, a great deal.

Jan 24 2015 Lee passed away and my income was cut in half.

I do not want have to move. I like it here. It is the most
affordable housing for me.

I know there is hope for this community and I know that you all
are working very hard at resolving this matter.

Thank you very much for everything.
Sincerely

Delores G Beaman
2311 W. 16th Ave Lot 250
Spokane WA 99224

From: [Sandra Pearson](#)
To: [Gwinn, Nathan](#); [Snyder, Jon](#)
Subject: Proposed Zoning for Manufactured home parks
Date: Monday, May 18, 2015 10:48:10 AM

Good Morning,

I am writing to you concerning the proposed zoning for the manufactured home parks in the city of Spokane. My husband and I are current residents of Cascade Manufactured Home Community and have been since December 2012. We were able to purchase this home when an elderly aunt of mine passed away and left me a gift. We love it here.

We both remark quite often how blessed we are to own our home and pay a monthly lot rental only. We are the kind of people that love owning our own home but could not afford a "traditional" home.

I am hoping that you will not be unduly influenced by the "big money" lawyers representing at least 3 large parks in Spokane who want this proposal stopped.

Thank you for considering the needs of the little guys out here in the world!

God bless you.

Sandra

"For God so loved the world that He gave His one and only Son that whosoever believeth in Him should not perish but have everlasting life." John 3:16

From: [Ishbel Dickens](#)
To: [Gwinn, Nathan](#)
Subject: Manufactured Housing Stakeholder meeting
Date: Thursday, July 09, 2015 8:57:14 PM

Nathan,

It was good to put a name and a face together this afternoon – thanks so much for your great work facilitating the meeting.

I have a few follow up items I'd like to share:

1. It is hard to understand why the Planning Commission workshop on the zoning issue is being moved at the request of a community owner representative, when the same courtesy was not afforded a home owner representative (me) when I commented that I could not be there for either of the August meetings. There are 11 manufactured housing communities in Spokane and they will be well represented at the workshop (whether or not they are allowed to testify) by their representatives. There are over 1,100 manufactured home owners and their families – it is unfortunate that their one representative will not be present if the workshop is held in August. I appreciate that the Planning Commission has other big issues to discuss at its July 22 meeting but since that is the date that is currently set for the workshop on manufactured housing, I respectfully request that this schedule be kept.
2. I overheard Robert Cochran stating that community owners are required to allow homes regardless of age to come into their communities. While in theory that may be true, in practice many community owners use aesthetics such as requirements that the home have wood siding or sloping roofs as a way to prevent older homes from being moved into communities.
3. I would support incentives as a way to encourage the preservation of manufactured housing communities but only if these are a quid pro quo for home owner protections. For instance a break on utility costs and property taxes paid by the community owner would be great incentives provided the home owners were given 5-10 year leases; a cap on the amount the rent can be raised (if the community owner gets a break on costs then presumably they will not need as much rental income to maintain a healthy profit margin); and at least 3 years' notice, if the community was going to be sold. Home owners need some guarantee of a return on their investment too.

There is still a lot to consider. I do hope I will be given the opportunity to participate as much as the community owners' representatives.

Best,

Ishbel

[Ishbel Dickens, Esq.](#)

[Executive Director](#)

[National Manufactured Home Owners Association \(NMHOA\)](#)

[PO Box 22346](#)

[Seattle WA 98122-0346](#)

206.851.6385

 nmhoa.org

www.nmhoa.org

Please like NMHOA on facebook:

<http://www.facebook.com/NationalManufacturedHomeOwnersAssociation>

Please consider the environment before choosing to print this.

SAVE THE DATE – NMHOA ANNUAL CONVENTION – Oct 24 & 25 – Minneapolis, MN.

From: [Robert Cochran](#)
To: [Gwinn, Nathan](#)
Subject: follow-up MHP stakeholders meeting
Date: Tuesday, July 14, 2015 11:53:16 AM
Attachments: [Spokane zone plan_14 July 2015.pdf](#)

Nathan,

Here's my input based largely on the two stakeholders meeting we have had thus far:

There are of course my previous submissions.

Robert Cochran
Contempo Spokane MHP
509 994 1909

Manufactured Housing Communities / Comprehensive Plan Amendment Stakeholders Discussions

City of Spokane, Plan Commission

Summary by Robert Cochran, stakeholder, manager of Contempo Mobile Home Park

1) The LU proposed comprehensive plan amendment that lays the groundwork to preserve selected manufactured housing communities within Spokane is a product of Corporation for Enterprise Development and is promoted heavily by Association of Manufactured Home Owners (AMHO) and especially by Ishbel Dickens, a founder of AMHO and current director of national association of MH owners (NMHOA). This zoning overlay plan is nothing but an attempt to make rental land permanent for the renters of the land at the expense of the property owners' rights. The arguments for a zoning change did not come from local homeowners facing local problems of communities closing.

2) Spokane has had decades of passive discrimination against manufactured homes (and some non-passive discrimination) that has lead to a skewed balance of housing compared with state and national averages. In WA, 70% or so of manufactured homes are located on their own land they control, 30% or so are located within manufactured housing communities. In Spokane, 80% of MH's are located within manufactured housing communities.

For the state, 9% of all households are made up of manufactured homes. About 2.3% are located in manufactured housing communities. For the city of Spokane, 0.47% of households are made up of MH's on their own land, and 1.76% of all households are MH's in communities and private land combined. This is far short of the 9% statistic of all households in the state. Just this statistic should be proof of the passive discrimination that has lead to the situation that practically the only place a person can live in a manufactured home within the city is to live in a manufactured housing community on rented land.

Should a person want to place a MH on private land in the city, current policy allows only brand new untitled homes to be placed. At one time, it was 10 years old or newer, then 7 years old and newer. Now it is brand new only, eliminating all relocation options to private land in the city for any homeowner who must vacate a manufactured housing community that is closing.

City of Spokane Valley eliminated their "new home only" requirement and made it simply a "post HUD 1976" requirement for private land location of MHs. This change occurred after they themselves considered a restrictive zoning ordinance sponsored by AMHO. They rejected any restrictive zoning for manufactured housing communities.

Spokane currently has in place a 10 acre minimum for any development of a new manufactured housing community. This anticipates allowing only 70 homes or more for a new development. There are few if any 10 acre parcels available, and there is no reason why a

smaller parcel for a 10-home or 20-home development would not be acceptable, unless the city really does not want any new manufactured housing communities.

The comprehensive plan requires the city to look at promoting a balanced blend of all types of housing. It appears the city has failed to promote manufactured housing as part of the blend in a balanced manner.

3) The plan commission should consider the option of rejecting the application to amend the comprehensive plan for the purpose of preserving manufactured housing communities solely based on the premise that “homeowners should be protected from having to relocate” their MHs. The amendment is unnecessary and was proposed in the application with incomplete information, and was based largely on hearsay, anecdotes and unsupported facts from AMHO and others.

4) The state’s manufactured housing relocation program exists and works. It could be improved by implementing a better funding source (the homeowners themselves on an annual basis for \$15 perhaps) instead of the \$100 per sale of home if home is worth more than \$5000. It could also be improved to give assistance to all tenant homeowners instead of “low-income” only and make the program a voucher system instead of a reimbursement system.

Along with the relocation program, there are significant protections for manufactured home owners who live in land-lease communities. These protections do work.

5) If in the future Spokane wishes to preserve a selected manufactured housing community people feel is in danger of closing, the Council should consider a housing authority type buyout of the community. This type of preservation has been done in the past by different cities, and in doing so the rights of the community owner are not trampled. Restrictive zoning tramples property rights.

6) Just to be clear, Ishbel Dickens of NMHOA and AMHO, Randy Chapman of AMHO, Kylin Parks of AMHO, are not stakeholders within the city of Spokane. The only stake they have in the situation is to promote their ideology in every municipality of the state. They actively promote legislation and policies to give more land rights to renters of the land while taking more rights away from the owners of the land. Both organizations are 501(c) 3 public charities.

7) Before Spokane takes any action that diminishes a land owners’ rights and puts in place an expensive and protracted process to seek zoning changes by a manufactured housing community owner, as this comprehensive plan amendment would do, the city might consider coming up with an accurate overview and general policy towards manufactured housing within the city. Manufactured housing options should be promoted, new manufactured housing communities should be promoted, and policies should be explored for incentives to preserve some manufactured housing communities should they fall into circumstances favorable to redevelopment.

Cheers
RGC 14 July 2015

From: [Ishbel Dickens](#)
To: [Gwinn, Nathan](#)
Cc: ["Randy Chapman"](#)
Subject: RE: Follow-up on Proposals from Members of MHP Stakeholder Group
Date: Tuesday, July 14, 2015 3:19:46 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[Comments July 14.2015City of Spokane.docx](#)

Good afternoon Nathan,

I'm not sure if the Planning Commission's workshop on the manufactured housing issues is happening next week as originally planned but I wanted to be mindful of the Commissioners' request that they get timely notice of comments.

Attached are my comments based on the proposal, alternative proposal, and alternative actions proposed to date.

I trust you will be able to get them to the Planning Commission in a timely fashion.

Best,

Ishbel

Ishbel Dickens, Esq.

Executive Director

National Manufactured Home Owners Association (NMHOA)

PO Box 22346

Seattle WA 98122-0346

206.851.6385

 nmhoa.org

www.nmhoa.org

Please like NMHOA on facebook:

<http://www.facebook.com/NationalManufacturedHomeOwnersAssociation>

Please consider the environment before choosing to print this.

SAVE THE DATE – NMHOA ANNUAL CONVENTION – Oct 24 & 25 – Minneapolis, MN.

From: Gwinn, Nathan [mailto:ngwinn@spokanecity.org]

Sent: Friday, July 10, 2015 2:37 PM

Subject: Follow-up on Proposals from Members of MHP Stakeholder Group

Good afternoon Mobile/Manufactured Home Park Preservation Stakeholder Group,

I attached my previous memo outlining suggested policy language alternatives that was sent to the Stakeholder Group prior to our second meeting yesterday. Although additional policies and actions

were suggested (see below), the group members attending yesterday did not achieve consensus regarding a proposed policy alternative or action. I will try to contact you early next week with an update on the date of the next Plan Commission workshop on this topic.

In addition to the policies contained in the attached memo, the following alternative policy text and alternative action were suggested at the second group meeting.

Proposed Policy Alternative 3:

H 1.X Housing in Mobile and Manufactured Home Parks

Encourage through incentives the development and maintenance of mobile home parks as a type of affordable housing.

Discussion: Mobile and manufactured home parks provide diverse housing for a variety of income classes. To encourage the development and retention of affordable housing in these communities, the City should explore and consider the use of economic and land use incentives to encourage the preservation of existing and development of new mobile and manufactured home parks.

Alternative Action to Adopting the Proposed Policy:

Reject proposed policy of LU 1.X as unneeded and unnecessary; the application does not contain enough information to go forward and is not consistent with the City of Spokane Comprehensive Plan.

Alternative Action to Adopting the Proposed Policy:

Further develop policy for Manufactured Housing overall and potentially purchase a park that the City wants to protect.

Please note that none of these items were endorsed by the group. Also please note these are only proposals suggested by members of the group for the purposes of optional written comment by group members who have concerns.

Sincerely,



Nathan Gwinn | Assistant Planner | Planning & Development

509.625.6893 | ngwinn@spokanecity.org | www.spokanecity.org



City of Spokane Proposals for manufactured housing zoning

Dear Planning Commission,

After attending the Mobile/Manufactured Home Park Preservation Stakeholder Group and hearing the discussion of the various proposed policies and some additional action requests that were brought to the table by the community owners' representatives, I would like to offer the following comments, in red, below.

Proposed Policy:

LU 1.X Mobile Home Parks

Designate appropriate areas for the preservation of mobile and manufactured home parks.

Discussion: Manufactured and/or Mobile Home Parks provide affordable housing to many City residents. In many cases, they provide the opportunity of home ownership to households which cannot afford to purchase other types of housing. When existing manufactured home parks are redeveloped, many homeowners are unable to move their homes to other sites. Additionally, redeveloped mobile and manufactured home parks are generally not replaced by new parks within the City, resulting in a net loss of this type of housing.

There are 11 manufactured housing communities in the City of Spokane providing spaces for more than 1,100 individuals and families to place the homes that they own.

Four other Washington jurisdictions have enacted "mobile home park" zones and the sky has not fallen in. The owners of these communities continue to operate profitable businesses and have been able to raise rents and/or sell their communities as they choose.

It would be great if the City of Spokane would follow suit. Indeed, all that the current proposal does is set up a designation. It does not even identify which communities might fall under that designation in the future.

This is a small step that would reassure low income families and seniors, that the City is serious about the need to take legitimate steps to preserve manufactured housing communities because once they are gone, they're gone.

Proposed Policy Alternative 1:

H 1.X Mobile and Manufactured Home Park Incentives

Examine potential incentives for the maintenance and development of mobile and manufactured home parks.

Discussion: Mobile and manufactured homes provide an affordable housing option for some of the city's residents. The City should explore the feasibility of using incentives to encourage preservation of existing manufactured and/or mobile home parks and the development of new manufactured and/or mobile home parks.

A local zoning ordinance would provide an incentive for manufactured housing community owners, since the communities could then be taxed at "current use" rather than "highest and best" use – thus

providing a tax savings to the community owner, which they are not obligated to pass on to the home owners.

Allowing a non-profit housing provider or a community land trust to build a new manufactured housing community would be great. This would ensure the long-term preservation of an affordable home ownership option for some. Private land lease developers do not necessarily provide affordable rental space for these homes.

Proposed Policy Alternative 2:

H 1.X Housing in Mobile and Manufactured Home Parks

Adopt appropriate criteria for the maintenance and/or development of mobile and manufactured home parks as one means of ensuring an adequate stock of affordable housing.

Discussion: Manufactured and/or mobile home parks can provide affordable housing to many city residents. In many cases, they provide the opportunity of home ownership to households which cannot afford to purchase other types of housing.

The City should develop a set of criteria to determine opportunities for preservation and development of manufactured and/or mobile home parks. Criteria to consider may be the occupancy rate of the park, the age and condition of the housing stock, the location of the park, whether the park serves seniors, and the demand for manufactured and/or mobile homes in the city of Spokane.

This proposal is very vague. Who decides what “appropriate criteria” is? Most communities are already close to 100% occupied and most home owners own their homes outright. However, whenever a community closes, more than half of them are likely to lose their homes and never be home owners again. Statistics from the State Dept. of Commerce show that over 50% of displaced home owners are unable to relocate their homes.

Older pre-HUD code homes could be phased out and replaced by new small footprint energy star homes (starting price \$38,000) so even if existing stock is held that may not necessarily be a criterion the City would want to entertain. Likewise, the community owner might be just fine with that older home being there – it still generates the same monthly income as the newer home beside it.

Proposed Policy Alternative 3:

H 1.X Housing in Mobile and Manufactured Home Parks

Encourage through incentives the development and maintenance of mobile home parks as a type of affordable housing.

Discussion: Mobile and manufactured home parks provide diverse housing for a variety of income classes. To encourage the development and retention of affordable housing in these communities, the City should explore and consider the use of economic and land use incentives to encourage the preservation of existing and development of new mobile and manufactured home parks.

As stated earlier, taxing a community that is zoned as such, at current use, rather than highest and best use would accomplish this goal. Additionally, a voluntary opportunity to receive lower utility costs and tax incentives if the community was kept as a “mobile home park” for 5-10 years might be worth considering, especially when the community owners insist that they plan to continue to operate their communities as such for at least the next 20 years.

Alternative Action to Adopting the Proposed Policy:

Reject proposed policy of LU 1.X as unneeded and unnecessary; the application does not contain enough information to go forward and is not consistent with the City of Spokane Comprehensive Plan.

Reject this action as counter to the City's desire to preserve housing affordable to all economic segments of the population, preserve existing neighborhoods, ensure a variety and density of housing options, and comply with the Growth Management Act.

Alternative Action to Adopting the Proposed Policy:

Further develop policy for Manufactured Housing overall and potentially purchase a park that the City wants to protect.

Additional policies might well be valid and could be pursued after the original Proposed Policy was established. After all, the Proposed Policy does not preclude additional study, or the ability to bring forward new ideas and new proposals if and when the City determines it is time to identify and designate particular communities as "mobile home parks" and zone accordingly.

Thank you for your consideration. There is a lot to think about and hopefully the desire of 1,100 Spokane households to preserve their homes and live within the City limits will play an important role in your deliberations.

Sincerely,

Ishbel Dickens
Executive Director,
National Manufactured Home Owners Association
PO Box 22346
Seattle WA 98122

206.851.6385

www.nmhoa.org

<http://www.facebook.com/NationalManufacturedHomeOwnersAssociation>

July 21, 2015

VIA U.S. MAIL and E-MAIL: ngwinn@spokanecity.org

City of Spokane Planning Commission
c/o Mr. Nathan Gwinn
City of Spokane Community Development Department
808 West Spokane Falls Boulevard
Spokane, Washington 99201

***RE: Manufactured Home Policy - Z1400065COMP
Comments from Sans Souci West***

Dear Members of the Planning Commission:

Shrine Park Association, Inc. ("Shrine Park"), the owner of Sans Souci West Mobile Home Park ("Sans Souci"), and members of the El Katif Shrine have been active participants in the stakeholder group formed to review the City of Spokane's proposed policy to preserve and protect manufactured and mobile home parks.

It has thus far participated in the two meetings and engaged in the deliberative process to determine whether the City's proposed policy addresses the twin goals of preserving a desired housing stock for the community and protecting affordable housing for citizens. The stakeholder group developed a number of alternatives ranging from continuing with the current policy to pursuing an overall analysis of affordable housing available within the City of Spokane, but none of these alternatives received the consensus of the group.

The proposed policy is not ripe for consideration by the Planning Commission. The City of Spokane Comprehensive Plan specifies an annual process for the City of Spokane to determine whether the existing goals and policies of the Housing Element are satisfied and to address whether there needs to be modifications. More particularly, H 3.5, entitled "Housing Goal Monitoring," states:

Provide a report annually to the City Plan Commission that monitors progress toward achieving the housing goals and includes recommended policy change if positive direction toward achieving housing goals is not occurring.

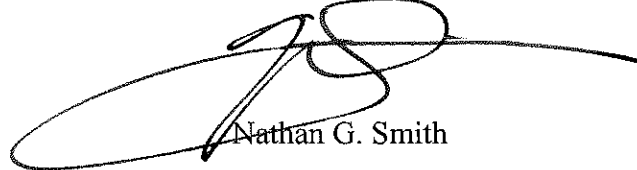
City of Spokane Comprehensive Plan, Goal H 3.5.

Sans Souci West understands that the foregoing has not occurred over the course of the past few years and the preparation of this annual report is a prerequisite to adopting any new policies addressing the City of Spokane's housing goals. This annual report should include the involvement of the public at large and providers of a variety of types of housing. Without the preparation of the annual report, the proposed policy could be inconsistent with or detrimental to the City's existing housing goals. The Planning Commission should request that there be an annual report prepared consistent with Goal H 3.5 before proceeding with further review of the proposed policy.

In the event that this matter moves forward toward a public hearing, Sans Souci will provide additional comments regarding the proposed policy. Should you have any questions regarding the foregoing, please do not hesitate to give me a call.

Very truly yours,

WITHERSPOON • KELLEY

A handwritten signature in black ink, appearing to be "Nathan G. Smith", written over a horizontal line.

NGS/kh

C: El Katif Shrine

From: [Randy Chapman](#)
To: [Gwinn, Nathan](#)
Subject: Could this happen here/
Date: Monday, July 27, 2015 6:48:13 AM

Hi Nathan,

This article came in a newsletter this morning and I would appreciate your forwarding to the Plan Commission. I so fear that this is what we would be facing in Spokane if we can't get something done with zoning in our fair city.



[startuptopia](#)

The Last Trailer Park in Techland

Palo Alto's Buena Vista Mobile Home Park is looking for a tech millionaire to save it

by [Andrew Thompson](#) July 10, 2015

unnamed



In October 2013, Joe Jisser, the manager of Buena Vista Mobile Home Park in Palo Alto, sent a letter to the park's four hundred and seventeen mostly low-income, mostly Hispanic residents. It informed them that his parents, Toufic and Eva Jisser, who own the park, were selling the property to a real estate developer. [Buena Vista is the city's last trailer park](#), and closing it will result in the loss of around a hundred units of affordable housing in one of the most expensive housing markets in the country. The ensuing legal battle became a fractious, public proxy fight over who gets to live in Palo Alto, a city that has been radically transformed by an influx of raw, uncut capital generated at bewildering scale by two technology booms in the past twenty years.

A somewhat arcane city law required the Jissers to pay to relocate the residents to a "comparable mobile-home park." The Jissers maintained that comparable options existed in nearby towns like Sunnyvale and Redwood City; they offered to pay about fifty-five thousand dollars to each resident to move. Residents argued that any trailer park outside of Palo Alto is effectively incomparable, in large part because of its highly regarded [public-school system](#)—which has been a path to the middle class for many Buena Vista residents, like Erika Escalante, a program manager at the Palo Alto Medical Foundation who grew up in the park, and who I talked

to last summer. A few months later, in December, a hearing officer appointed by the city sided with the Jissers, allowing them to close the park and relocate its residents outside of Palo Alto with six months notice, a decision reaffirmed by the city council.

But since January, in the background of the appeal hearings, local politicians and philanthropists have rallied to meet the Jissers' asking price of the four-acre lot and purchase the park, allowing the residents to stay in their homes. By then, Prometheus, the developer to whom the Jissers originally planned to sell the land—and one of the largest developers in Silicon Valley—had already backed out of the process, reportedly turned off by the situation's poor optics.

Exactly what the land underneath Buena Vista is now worth is uncertain. The Jissers initially rejected a fourteen-and-a-half million dollar offer cobbled together by the park's residents in favor of a thirty-million-dollar bid from Prometheus. But in Palo Alto, even a figure of thirty million dollars, appraised in 2013, is profoundly outdated. Average housing prices in the past year alone [have risen twenty-one percent](#), and at the current rate, Palo Alto home prices increase on average by about thirty-five thousand dollars per month. Prices move upward so briskly that the City Council, in its most recent decision in May, required the Jissers to conduct a new appraisal.

Buena Vista's advocates have largely been galvanized around a now-standard Silicon Valley irony—that a region so concerned with “changing the world” is able to so fully ignore the indigence of its own residents. “This would fulfill Palo Alto's estimation of itself, ‘We can do it, we can do anything, we have fabulous values, we are more innovative than anybody, we can solve problems,’” Winter Dellenbach, a retired civil rights lawyer and the park's chief non-resident vanguard, told me. “So if Buena Vista doesn't work out...” she trailed off.

The park's supporters have quilted together thirty-nine million dollars to buy it on behalf of its current residents: fourteen-and-a-half million from the county (for every square foot of land that Stanford has developed since 1999, [it has paid twenty dollars into a county fund for the development of low-income housing](#) within six miles of the university); fourteen-and-a-half million dollars from the city, in matching funds; and ten million in the form of a tax-exempt bond from Caritas, a nonprofit that manages low-income mobile home parks, and which would likely manage the park if it was successfully purchased from the Jissers on behalf of its residents.

With additional fees and other anticipated costs, the total amount needed to purchase Buena Vista is stands at more than forty million dollars—at least three hundred forty thousand dollars per trailer—and could rise by millions more, depending on the outcome of a new appraisal. To raise additional funding, a local foundation has contacted several local tech plutocrats in the hopes that their charitable interests might align with Buena Vista's needs.

The question of whether or not it's worth it is really a question of, “What would this cost to replace this affordable housing unit if we lost it from our stock?” Joe Simitian, a local politician-of-all-trades who, at various points, has been Palo Alto's mayor, state senator, and is now its county supervisor, told me. He pointed out that an affordable housing project built in 2014 that took a decade of politicking and fundraising to develop provided fifty units of housing at six hundred thousand dollars a unit.

No matter how much money supporters raise, the whole deal is, of course, contingent on the Jissers accepting the offer. Neither Jissers nor their lawyer could be reached for comment. “I'm in regular contact with the property owners,” Simitian said, adding that the decision to allow the Jissers to close the park was made on May 26th, “and Mr. Jisser and I were in my office the next morning at 10 o'clock. We've probably met four or five times in the intervening months. We talk on the phone. He wants to shop the property and get sense of what the market is for his property. But we talk and we're still talking.”

--

[Randy Chapman](#)

President

Association of Manufactured Home Owners

PO Box 30273 Spokane, WA 99223

[\[REDACTED\]@gmail.com](#)

509-343-9624

Learn from the mistakes of others.....You can't live long enough to make them all yourself.

From: [Gwinn, Nathan](#)
To: ["Randy Chapman"](#)
Subject: RE: 9th Circuit Court Decision
Date: Thursday, July 30, 2015 11:45:00 AM

Good morning Randy:

Thank you for your comment. I will include it and the article you forwarded Monday, July 27 in the public record for this file.

I found the following existing links for the documents you attached:

Tumwater 9th Circuit Opinion:

<http://cdn.ca9.uscourts.gov/datastore/opinions/2012/10/29/11-35466.pdf>

Tumwater Mobile Home Park Zoning Ordinance:

<http://www.codepublishing.com/wa/tumwater/?Tumwater18/Tumwater1849.html#18.49.070>

Sincerely,

Nathan Gwinn | Assistant Planner | City of Spokane

509.625.6893 | ngwinn@spokanecity.org | www.spokanecity.org

From: Randy Chapman [mailto:[\[REDACTED\]@gmail.com](#)]
Sent: Wednesday, July 29, 2015 7:09 PM
To: Gwinn, Nathan
Subject: 9th Circuit Court Decision

Nathan would you please include this in the Public comments for the Planning Commission proceedings on the zoning of Manufactured housing in the City of Spokane. Both the Tumwater zoning ordinance and the 9th Circuit Court decision are included here.
Thanks.

--

Randy Chapman
President
Association of Manufactured Home Owners
PO Box 30273 Spokane, WA 99223
[\[REDACTED\]@gmail.com](#)
[509-343-9624](tel:509-343-9624)

Learn from the mistakes of others.....You can't live long enough to make them all yourself.

From: [D.W.Pappenheim](#)
To: [Gwinn, Nathan](#)
Subject: Comprehensive Plan Policy targeted at Sans Souci hurts Shriners
Date: Thursday, August 13, 2015 8:55:04 AM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

The city should not limit El Katif's ability to appropriately manage Sans Souci for the best interest of the organization and the Spokane Shriners Children's Hospital.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital.

Sincerely,

D.W. Pappenheim

 sanssouciwest.com

From: [Robert Breza](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci's potential rezone hurts Shriners Hospital
Date: Thursday, August 13, 2015 9:05:43 AM

I'm writing today because I believe it would be a mistake to adopt the proposed Comprehensive Plan Policy applicable to the Sans Souci Mobile Homes Park.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

Thank you for what you do for our city. Please consider my email and reject this misguided amendment to the city's Comprehensive Plan.

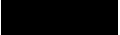
Sincerely,
Robert Breza
[REDACTED]@gmail.com

From: [Ronald Rodgers](#)
To: [Gwinn, Nathan](#)
Subject: Oppose Sans Souci plan
Date: Thursday, August 13, 2015 9:21:51 AM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park is a shortsighted plan with potentially devastating long-term consequences.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major contributor to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

Thank you for allowing me to speak out on this important issue. Please support the Shriners and reject this amendment.


Sincerely,
Ronald Rodgers
nwlink.com

From: [kurt Kimberling](#)
To: [Gwinn, Nathan](#)
Subject: Don't allow a potential rezone of Sans Souci West
Date: Thursday, August 13, 2015 9:50:11 AM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

While having low and moderate income housing in Spokane is a worthy goal, mandating land owners (no matter who they are) to maintain this designation for perpetuity is simply not right. City officials are off-target on this one.

I appreciate your service to the city and the time you've spent on this issue. I hope you will reject this amendment.

Sincerely,
kurt Kimberling
comcast.net

From: [HARVEY MACQUARRIE](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Thursday, August 13, 2015 10:02:21 AM

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

The El Katif Shriners have a long track record of supporting the children's hospital. We are all incredibly lucky to have the El Katif Shriners here.

Please do what's right for the Shriners and the good work they do.

Sincerely,
HARVEY MACQUARRIE
[REDACTED]@MSN.COM

From: [David Wetmore](#)
To: [Gwinn, Nathan](#)
Subject: Hands off Shriners" private property
Date: Thursday, August 13, 2015 10:17:40 AM

I'm writing to you today because I think the city is wrong to even consider a potential rezone of the Sans Souci Mobile Home Park.

Instead of considering proposals that would restrict what El Katif can do with its own private property, the city ought to be doing whatever it can to support the Shriners' good charitable works in our community.

Please support the El Katif Shriners and the good works they do. Thank you for your time.

Sincerely,
David Wetmore
lighting. [REDACTED] gmail.com

From: [Bruce Bothman](#)
To: [Gwinn, Nathan](#)
Subject: Spokane supports Shriners Children's Hospital
Date: Thursday, August 13, 2015 10:32:38 AM

I'm writing today because I believe would be a mistake to adopt the proposed Comprehensive Plan Policy applicable to the Sans Souci Mobile Home Park.

I agree providing housing for low- and moderate-income residents is a worthy goal but this is the wrong way to do it. The Shriners need this income from this property to support the Children's hospital.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.

Sincerely,
Bruce Bothman
[REDACTED]@aol.com

From: [John Pasteur](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Shriners Comprehensive Plan Policy
Date: Thursday, August 13, 2015 10:47:30 AM

I'm writing to you today because I think the city is wrong to even consider a potential rezone of the Sans Souci Mobile Home Park.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major funder of the Shriner's hospital. Don't do anything to interfere with that.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.


Sincerely,
John Pasteur
[REDACTED]comcast.net

From: [Richard Dawe](#)
To: [Gwinn, Nathan](#)
Subject: El Katif Supports our Community
Date: Thursday, August 13, 2015 10:49:55 AM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park could have devastating consequences for the El Katif Shriners and the fundraising it does for Shriners Hospital.

Sans Souci Mobile Home Park income supports the operations of El Katif. The city should be very careful about rewriting the rules governing what the Shriners can or cannot do as property owners and as valuable members of our community.

Thank you for reading and for doing everything you can to support the El Katif Shriners.


Sincerely,
Richard Dawe
comcast.net

From: [Kurt H. Sterzelbach](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Thursday, August 13, 2015 11:07:18 AM

Please support our Shriners and the Spokane Shriners Children's Hospital by rejecting a proposed Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

Sans Souci Mobile Home Park income supports the operations of El Katif. The city should be very careful about rewriting the rules governing what the Shriners can or cannot do as property owners and as valuable members of our community.

I appreciate your time. It's important to me and to others in our community to support the Shriners and their good work.

Sincerely,
Kurt H. Sterzelbach
comcast.net

From: [Mike Lish](#)
To: [Gwinn, Nathan](#)
Subject: Fair housing plan isn't fair to Shriners
Date: Thursday, August 13, 2015 11:13:50 AM

I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

The biggest source of income for the El Katif Shriners is the Sans Souci Mobile Home Park. Spokane officials should be careful about rewriting the rules about what the Shriners can do with the property they own.

Thank you for reading my email. And please vote No on the Sans Souci amendment.


Sincerely,
Mike Lish
lish. [REDACTED] gmail.com

From: [David Chamberlin](#)
To: [Gwinn, Nathan](#)
Subject: Shriners's projects will suffer with City's proposed Comprehensive Plan Policy
Date: Thursday, August 13, 2015 11:19:21 AM

Please stop the proposed plan that would allow for the City to rezone the Sans Souci Mobile Home Park.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major contributor to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

Thank you for allowing me to speak out on this important issue. Please support the Shriners and reject this amendment.

Sincerely,
David Chamberlin
rocketmail.com

From: [Robert D.faulkner](#)
To: [Gwinn, Nathan](#)
Subject: Mobile Home goal hurts Shriners
Date: Thursday, August 13, 2015 11:20:18 AM

I think it's a terrible idea for you to adopt the Comprehensive Plan Policy for the the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land. I have lived in Spokane all my life ,76 years, and none of the past owners have taken care of this property, like the El Katif Shriners

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

This is important to me and to our community. Please do the right thing and reject this amendment.

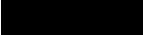
Sincerely,
Robert D. faulkner
[REDACTED]hotmail.com

From: [Bill Willey](#)
To: [Gwinn, Nathan](#)
Subject: Oppose Sans Souci plan I profoundly oppose this amendment.
Date: Thursday, August 13, 2015 1:19:52 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park is a shortsighted plan with potentially devastating long-term consequences.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major contributor to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

Please don't support this zoning change. It's not right for the Shriners and it doesn't help low-income families who need charity most.

Sincerely,
Bill Willey
live.com

From: [Robert Valentine](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci rental income supports El Katif Shriners
Date: Thursday, August 13, 2015 1:22:29 PM

Please drop the idea of a Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

While having low and moderate income housing in Spokane is a worthy goal, mandating land owners (no matter who they are) to maintain this designation for perpetuity is simply not right. City officials are off-target on this one.

Thank you for what you do for our city. Please consider my email request and reject this misguided amendment to the city's Comprehensive Plan.

Sincerely,
Robert Valentine
[REDACTED]@yahoo.com

From: [Barbara Valentine](#)
To: [Gwinn, Nathan](#)
Subject: Shriners" main source of revenue is under attack
Date: Thursday, August 13, 2015 1:24:16 PM

I want to make sure that the Spokane Shriners Children's Hospital can continue to provide good care for local kids. That's why I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

The amount of income the Shriners can derive from this property they own is explicitly limited by a Comprehensive Plan amendment that will be in front of the Spokane City Planning Commission. Long-term, that means less money available for fundraising for Shriners Hospital.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter.

Sincerely,
Barbara Valentine
yahoo.com

From: [James Bech](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci's potential rezone hurts Shriners Hospital
Date: Thursday, August 13, 2015 2:08:37 PM

Please reject a proposed Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

The El Katif Shriners have a long track record of supporting the children's hospital. We are all incredibly lucky to have the El Katif Shriners here.

This is important to me and to our community. Please do the right thing and reject this amendment.

Sincerely,
James Bech
[REDACTED]@gmail.com


From: [William Jeanneret](#)
To: [Gwinn, Nathan](#)
Subject: Comprehensive Plan Policy targeted at Sans Souci hurts Shriners
Date: Thursday, August 13, 2015 3:32:24 PM

I believe it's just plain wrong for the city to adopt a Comprehensive Plan Policy allowing a rezone of the Sans Souci Mobile Home Park and forever limit the amount of money the Shriners can get from the property.

This Comprehensive Plan Policy proposal that will go before the Spokane City Planning Commission explicitly limits the amount of income the Shriners can derive from this property long-term and that means the amount of money available for local charities.

Please do what's right. Please vote to reject this misguided rezone plan. Thank you for your time.

My lady and I reject this misguided rezone plan that would limit long term income growth from San Souci, a critical income source for Shriners to meet future costs at the Shriners Hospitals. We are grandfathered in our financial commitment to maintain Shriners Hospital. Please do not rezone our San Souci Park. Thank you for your consideration.

Sincerely,
William Jeanneret
msn.com

From: [James Berdal](#)
To: [Gwinn, Nathan](#)
Subject: Shriners" main source of revenue is under attack
Date: Thursday, August 13, 2015 7:53:53 PM

I can't believe that you are going to force the Sans Souci Mobile Home Park to remain nothing more than low-income housing forever. That's a dumb idea.

Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and a majority of their giving benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Thank you for reading and for doing everything you can to support the El Katif Shriners.

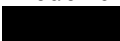
Sincerely,
James Berdal
[REDACTED]yahoo.com

From: [Frederic Anderson](#)
To: [Gwinn, Nathan](#)
Subject: Don't limit Shriners' good work
Date: Thursday, August 13, 2015 8:16:41 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park is a shortsighted plan with potentially devastating long-term consequences.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major funder of the Shriner's hospital. Don't do anything to interfere with that.

This is important to me and to our community. Please do the right thing and reject this amendment.


Sincerely,
Frederic Anderson
 charter.net

From: [Jim Stewart](#)
To: [Gwinn, Nathan](#)
Subject: Shriners" main source of revenue is under attack
Date: Thursday, August 13, 2015 8:41:57 PM

Please stop the proposed plan that would allow for the City to rezone the Sans Souci Mobile Home Park.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major contributor to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

Thank you for allowing me to speak out on this important issue. Please support the Shriners and reject this amendment.


Sincerely,
Jim Stewart
 hughes.net

From: [David Campanella](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Friday, August 14, 2015 6:55:14 AM

Please stop the proposed plan that would allow for the City to rezone the Sans Souci Mobile Home Park.

The biggest source of income for the El Katif Shriners is the Sans Souci Mobile Home Park. Spokane officials should be careful about rewriting the rules about what the Shriners can do with the property they own.

Please consider all the facts and then vote against this amendment. I thank you and so will the Shriners.

Sincerely,
David Campanella
msn.com

From: [Thomas Redeye](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Friday, August 14, 2015 8:37:02 AM

Spokane's Shriners hospital will suffer if a proposed Comprehensive Plan Policy is adopted permitting a rezone of the Sans Souci Mobile Home Park.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major funder of the Shriner's hospital. Don't do anything to interfere with that.

I suspect that you receive a lot of emails, so thank you for reading mine. Please consider the impact this amendment will have on the Shriners and the Spokane Shriners Children's Hospital.

Sincerely,
Thomas Redeye
[REDACTED]@gmail.com

From: [Gary E. Waterhouse](#)
To: [Gwinn, Nathan](#)
Subject: Hands off Shriners" private property
Date: Friday, August 14, 2015 12:08:23 PM

I'm writing today because I'm not sure why Spokane city officials would vote to restrict the amount of money the Shriners can raise for the Shriners Hospital.

It is important to remember that Sans Souci is an investment property that funds El Katif. El Katif is a major contributor to the Shriners Children's Hospital. Therefore Spokane must not do anything that could damage El Katif's ability to earn income from this property.

Thank you for reading and for doing everything you can to support the El Katif Shriners.

Sincerely,
Gary E. Waterhouse
gary. [REDACTED] gmail.com

From: [Reba Vosecky](#)
To: [Gwinn, Nathan](#)
Subject: El Katif Supports our Community
Date: Friday, August 14, 2015 1:18:48 PM

I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

I want to see the city support El Katif, the Shriners Children's Hospital and the charities it supports. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

Thank you for reading my email. The Shriners do important work in our community.


Sincerely,
Reba Vosecky
rebaj_ [REDACTED] yahoo.com

From: [Duane Cook](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Friday, August 14, 2015 1:58:34 PM

I'm writing to you today because I think the city is wrong to even consider a potential rezone of the Sans Souci Mobile Home Park.

I agree providing housing for low- and moderate-income residents is a worthy goal but this is the wrong way to do it. The Shriners need this income from this property to support the Children's hospital.

Thank you for your service to our community. I am confident you will do the right thing to protect the Shriners and future revenues for the children's hospital.

Sincerely,
Duane Cook
theofficenet.com

From: [Bright M.Bowe](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Shriners Comprehensive Plan Policy
Date: Friday, August 14, 2015 2:25:41 PM

I can't believe that you are going to force the Sans Souci Mobile Home Park to remain nothing more than low-income housing forever. That's a dumb idea.

Under this Comprehensive Plan Policy, El Katif would never be able to add apartments or condominiums to the property or change the housing mix in any way to increase revenue.

I appreciate your service to the city and the time you've spent on this issue. I hope you will reject this amendment.

Sincerely,
Bright M. Bowe
4005 S. Irby St.

From: [Bright M.Bowe](#)
To: [Gwinn, Nathan](#)
Subject: Spokane supports Shriners Children's Hospital
Date: Friday, August 14, 2015 2:58:20 PM

Please re-think your idea, your purposed amendment to the Comprehensive Plan would greatly effect our El Katif income of support to our fraternity and hospital care for children. This is our major source of income for caring for and treatment the children within the eastern Washington area. This is a terrible idea and one not well thought out by City Council and their Planning Commissioners. Please reconsider this purposed amendment.

Thank you

Bright Bowe


Sincerely,
Bright M. Bowe
4005 S. Irby St.

From: [merlin buchanan](#)
To: [Gwinn, Nathan](#)
Subject: Oppose Sans Souci plan
Date: Friday, August 14, 2015 3:49:24 PM

I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

I suspect that you receive a lot of emails, so thank you for reading mine. Please consider the impact this amendment will have on the Shriners and the Spokane Shriners Children's Hospital.

Sincerely,
merlin buchanan
wildBlue.net.

From: [Jerry Combs](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Sans Souci West Comprehensive Plan Policy
Date: Friday, August 14, 2015 7:01:15 PM

I'm writing today because I'm not sure why Spokane city officials would vote to restrict the amount of money the Shriners can raise for the Shriners Hospital.

The amount of income the Shriners can derive from this property they own is explicitly limited by a Comprehensive Plan amendment that will be in front of the Spokane City Planning Commission. Long-term, that means less money available for fundraising for Shriners Hospital.

This is important to me and to our community. Please do the right thing and reject this amendment.

Sincerely,
Jerry Combs
[REDACTED]q.com

From: [James Bockstruck](#)
To: [Gwinn, Nathan](#)
Subject: Comprehensive Plan Policy limits Shriners' income
Date: Saturday, August 15, 2015 12:32:05 AM

I can't believe that you are going to force the Sans Souci Mobile Home Park to remain nothing more than low-income housing forever. That's a dumb idea.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital.

Thank you for your service to our community. I am confident you will do the right thing to protect the Shriners and future revenues for the children's hospital.

Sincerely,
James Bockstruck
jameslee_ [REDACTED] hotmail.com

From: [Thomas Stark](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci rental income supports El Katif Shriners
Date: Saturday, August 15, 2015 9:33:28 AM

I think it's a terrible idea for you to adopt the Comprehensive Plan Policy for the the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

The city should not limit El Katif's ability to appropriately manage Sans Souci for the best interest of the organization and the Spokane Shriners Children's Hospital.

Thank you for reading and for doing everything you can to support the El Katif Shriners.

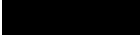
Sincerely,
Thomas Stark
[REDACTED]@gmail.com

From: [Al Conetto](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Sans Souci West Comprehensive Plan Policy
Date: Saturday, August 15, 2015 12:17:40 PM

Spokane's Shriners hospital will suffer if a proposed Comprehensive Plan Policy is adopted permitting a rezone of the Sans Souci Mobile Home Park.

While having low and moderate income housing in Spokane is a worthy goal, mandating land owners (no matter who they are) to maintain this designation for perpetuity is simply not right. City officials are off-target on this one.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.

Sincerely,
Al Conetto
 charter.net

From: [Richard Kerber](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci rental income supports El Katif Shriners
Date: Saturday, August 15, 2015 7:47:24 PM

Lately I've heard that the city wants to forever limit what the El Katif Shriners can do with their own property. Don't do it.

I want to see the city support El Katif, the Shriners Children's Hospital and the charities it supports. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

Thank you for your service to our community. I am confident you will do the right thing to protect the Shriners and future revenues for the children's hospital.

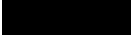
Sincerely,
Richard Kerber
[REDACTED]@aol.com

From: [Jim Heebink](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Sunday, August 16, 2015 7:05:40 AM

I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

I know you receive a lot of email from members of the public. Thank you for reading mine and considering my concerns about how this rezone will affect the El Katif Shriners.

Sincerely,
Jim Heebink
centurytel.net

From: [Tom Felton](#)
To: [Gwinn, Nathan](#)
Subject: Protect El Katif investment potential
Date: Sunday, August 16, 2015 6:42:32 PM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

I appreciate your service to the city and the time you've spent on this issue. I hope you will reject this amendment.


Sincerely,
Tom Felton
[REDACTED]@aol.com

From: [Dan Martin](#)
To: [Gwinn, Nathan](#)
Subject: Spokane supports Shriners Children's Hospital
Date: Sunday, August 16, 2015 11:41:07 PM

I believe it's just plain wrong for the city to adopt a Comprehensive Plan Policy allowing a rezone of the Sans Souci Mobile Home Park and forever limit the amount of money the Shriners can get from the property.

Your job is to look out for what's best for our community. I believe it's best for our community to support El Katif Shriners and the good works they do, especially in support of the Spokane Shriners Children's Hospital.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.

Sincerely,
Dan Martin
hotmail.com

From: [Ted Toll](#)
To: [Gwinn, Nathan](#)
Subject: Hands off Shriners" private property
Date: Monday, August 17, 2015 9:31:44 AM

Please stop the proposed plan that would allow for the City to rezone the Sans Souci Mobile Home Park.

It is important to remember that Sans Souci is an investment property that funds El Katif. El Katif is a major contributor to the Shriners Children's Hospital. Therefore Spokane must not do anything that could damage El Katif's ability to earn income from this property.

Thank you for what you do for our city. Please consider my email and reject this misguided amendment to the city's Comprehensive Plan.

Sincerely,
Ted Toll
[REDACTED]@yahoo.com

From: [Roger Gehrig](#)
To: [Gwinn, Nathan](#)
Subject: Don't allow a potential rezone of Sans Souci West
Date: Monday, August 17, 2015 4:24:48 PM

I believe it's just plain wrong for the city to adopt a Comprehensive Plan Policy allowing a rezone of the Sans Souci Mobile Home Park and forever limit the amount of money the Shriners can get from the property.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major funder of the Shriner's hospital. Don't do anything to interfere with that.

Thank you for what you do for our city. Please consider my email and reject this misguided amendment to the city's Comprehensive Plan.

Sincerely,
Roger Gehrig
Pote08.█gmail.com

From: [George Manson](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Monday, August 17, 2015 5:52:59 PM

I have a hard time understanding why Spokane city officials would consider limiting the amount of income the El Katif Shriners can make off of land they've owned for years.

I agree providing housing for low- and moderate-income residents is a worthy goal but this is the wrong way to do it. The Shriners need this income from this property to support the Children's hospital.

I appreciate your service to the city and the time you've spent on this issue. I hope you will reject this amendment.

Sincerely,
George Manson
[REDACTED]hotmail.com

From: [Tom Richardson](#)
To: [Gwinn, Nathan](#)
Subject: Don't limit Shriners' good work
Date: Monday, August 17, 2015 9:40:56 PM

I seldom write to city officials but I am today because this is important: Please stop the proposed Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital.

Sincerely,
Tom Richardson
[REDACTED]@gmail.com

From: [Charles D.Hall](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Tuesday, August 18, 2015 1:24:49 PM

Spokane's Shriners hospital will suffer if a proposed Comprehensive Plan Policy is adopted permitting a rezone of the Sans Souci Mobile Home Park.

While having low and moderate income housing in Spokane is a worthy goal, mandating land owners (no matter who they are) to maintain this designation for perpetuity is simply not right. City officials are off-target on this one.

I suspect that you receive a lot of emails, so thank you for reading mine. Please consider the impact this amendment will have on the Shriners and the Spokane Shriners Children's Hospital.

Sincerely,
Charles D. Hall
[REDACTED]@gmail.com

From: [cynthia.pasteur](#)
To: [Gwinn, Nathan](#)
Subject: Protect El Katif investment potential
Date: Thursday, August 20, 2015 4:11:49 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park could have devastating consequences for the El Katif Shriners and the fundraising it does for Shriners Hospital.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Please consider all the facts and then vote against this amendment. I thank you and so will the Shriners.

Sincerely,
cynthia.pasteur
[REDACTED]comcast.net

From: [Jasmes Ball](#)
To: [Gwinn, Nathan](#)
Subject: Don't allow a potential rezone of Sans Souci West
Date: Thursday, August 20, 2015 9:31:55 PM

Spokane's Shriners hospital will suffer if a proposed Comprehensive Plan Policy is adopted permitting a rezone of the Sans Souci Mobile Home Park.

Under this Comprehensive Plan Policy, El Katif would never be able to add apartments or condominiums to the property or change the housing mix in any way to increase revenue.

Please don't support this zoning change. It's not right for the Shriners and it doesn't help low-income families who need charity most.


Sincerely,
Jasmes Ball
[REDACTED]hotmail.com

From: [Gary Van Dyke](#)
To: [Gwinn, Nathan](#)
Subject: Protect El Katif investment potential
Date: Tuesday, August 25, 2015 12:43:28 PM

I'm writing today because I'm not sure why Spokane city officials would vote to restrict the amount of money the Shriners can raise for the Shriners Hospital.

I agree providing housing for low- and moderate-income residents is a worthy goal but this is the wrong way to do it. The Shriners need this income from this property to support the Children's hospital.

Please support the El Katif Shriners and the good works they do. Thank you for your time.

Sincerely,
Gary Van Dyke
msn.com

From: [Charles Roberts](#)
To: [Gwinn, Nathan](#)
Subject: Shriners suffer with Comprehensive Plan Policy
Date: Tuesday, August 25, 2015 12:44:13 PM

I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

The El Katif Shriners have a long track record of supporting the children's hospital. We are all incredibly lucky to have the El Katif Shriners here.

I know you receive a lot of email from members of the public. Thank you for reading mine and considering my concerns about how this rezone will affect the El Katif Shriners.


Sincerely,
Charles Roberts
[REDACTED]@gmail.com

From: [Ronald Rodgers](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Tuesday, August 25, 2015 12:54:28 PM

Lately I've heard that the city wants to forever limit what the El Katif Shriners can do with their own property. Don't do it.

Your job is to look out for what's best for our community. I believe it's best for our community to support El Katif Shriners and the good works they do, especially in support of the Spokane Shriners Children's Hospital.

I thank you and I know that local families will thank you for doing the right thing and supporting the El Katif Shriners.

Sincerely,
Ronald Rodgers
nwlink.com

From: [Sean Morgan](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Sans Souci West Comprehensive Plan Policy
Date: Tuesday, August 25, 2015 12:57:10 PM

Please support our Shriners and the Spokane Shriners Children's Hospital by rejecting a proposed Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

While having low and moderate income housing in Spokane is a worthy goal, mandating land owners (no matter who they are) to maintain this designation for perpetuity is simply not right. City officials are off-target on this one.

This is important to me and to our community. Please do the right thing and reject this amendment.

Sincerely,
Sean Morgan
[REDACTED]@gmail.com

From: [kim.berg](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Tuesday, August 25, 2015 12:57:14 PM

Please do not tie the hands of our community based organization. We are good citizens who support our community and our philanthropy. Do not hamstring us with zoning restrictions.

I'm writing today because I believe would be a mistake to adopt the proposed Comprehensive Plan Policy applicable to the Sans Souci Mobile Home Park.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major contributor to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital.

Sincerely,
kim.berg
[REDACTED]@gmail.com

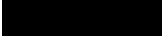
From: [William Wilson](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci rental income supports El Katif Shriners
Date: Tuesday, August 25, 2015 1:04:53 PM

Please drop the idea of a Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and a majority of their giving benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Thank you for your service to our community. I am confident you will do the right thing to protect the Shriners and future revenues for the children's hospital.

Thank you very much,
We're here for just the kids and need all the help we can get,
WT "Bill" Wilson

Sincerely,
William Wilson
comcast.net

From: [James A Williams](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Tuesday, August 25, 2015 1:15:19 PM

I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major funder of the Shriner's hospital. Don't do anything to interfere with that.

Thank you for what you do for our city. Please consider my email and reject this misguided amendment to the city's Comprehensive Plan.

Jim Williams

Proud to be a Shriner!

Sincerely,
James A Williams
comcast.net

From: [Marc Johnston](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Sans Souci West Comprehensive Plan Policy
Date: Tuesday, August 25, 2015 1:26:29 PM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

Spokane is incredibly fortunate to have the El Katif Shriners here. They have a long track record of supporting the children's hospital and other worthy charities with money received from the Sans Souci Mobile Home Park.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.

Sincerely,
Marc Johnston
[REDACTED]@gmail.com

From: [Merle](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Tuesday, August 25, 2015 1:48:07 PM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

I view this as a taking of property without due process. While currently a Mobile Home Park, such a designation precludes the ability to use the property for other uses and requires the landlord to meet what ever future regulations the City in its wisdom may require.

I thank you and I know that local families will thank you for doing the right thing and supporting the El Katif Shriners.

Sincerely,
Merle
Iverson

From: [Bob Brockman](#)
To: [Gwinn, Nathan](#)
Subject: Shriners suffer with Comprehensive Plan Policy
Date: Tuesday, August 25, 2015 1:55:12 PM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

Spokane is incredibly fortunate to have the El Katif Shriners here. They have a long track record of supporting the children's hospital and other worthy charities with money received from the Sans Souci Mobile Home Park.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter.

Sincerely,
Bob Brockman
[REDACTED]@yahoo.com

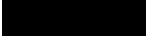
From: [Dave Tellessen](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Tuesday, August 25, 2015 1:55:14 PM

I am writing because I want to make sure that a plan allow for a potential rezone of the Sans Souci Mobile Home Park is rejected.

I want to see the city support El Katif, the Shriners Children's Hospital and the charities it supports. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.

Dave Tellessen

Sincerely,
Dave Tellessen
comcast.net

From: [Kathy Tellessen](#)
To: [Gwinn, Nathan](#)
Subject: Comprehensive Plan Policy limits Shriners' income
Date: Tuesday, August 25, 2015 1:56:13 PM

I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

Thank you for what you do for our city. Please consider my email and reject this misguided amendment to the city's Comprehensive Plan.

Kathy Tellessen

Sincerely,
Kathy Tellessen
[REDACTED]comcast.net

From: [Jason Flodin](#)
To: [Gwinn, Nathan](#)
Subject: Oppose Sans Souci plan
Date: Tuesday, August 25, 2015 2:43:15 PM

I am writing because I want to make sure that a plan allow for a potential rezone of the Sans Souci Mobile Home Park is rejected.

The city should not limit El Katif's ability to appropriately manage Sans Souci for the best interest of the organization and the Spokane Shriners Children's Hospital.

I appreciate your service to the city and the time you've spent on this issue. I hope you will reject this amendment.

Sincerely,
Jason Flodin
jas_ [REDACTED] hotmail.com

From: [Barry K Jones](#)
To: [Gwinn, Nathan](#)
Subject: Our Shriners Need Your Support
Date: Tuesday, August 25, 2015 3:52:00 PM

Please reject a proposed Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

Under this Comprehensive Plan Policy, El Katif Shrine, as omers would never be able to add apartments or condominiums to the property or change the housing mix in any way to increase revenue.

They should have the ability to change the housing mix in the future as necessary to continue to receive funds to help their support of The Spokane Shriners Hospital

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.

Sincerely,
Barry K Jones
[REDACTED]@gmail.com

From: [Stacy Flynn](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Tuesday, August 25, 2015 4:37:26 PM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital.

Thank you for considering my concerns. I hope you will agree that we need to do all we can do to support the Shriners.

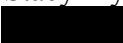
Sincerely,
Stacy Flynn
ssflyn

From: [Stacy Flynn](#)
To: [Gwinn, Nathan](#)
Subject: Shriners" main source of revenue is under attack
Date: Tuesday, August 25, 2015 4:38:20 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park is a shortsighted plan with potentially devastating long-term consequences.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter.

Sincerely,
Stacy Flynn
live.com

From: [Melvin Neil](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci rental income supports El Katif Shriners
Date: Tuesday, August 25, 2015 6:51:14 PM

Please stop the proposed plan that would allow for the City to rezone the Sans Souci Mobile Home Park.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major contributor to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.

Sincerely,
Melvin Neil
[REDACTED]comcast.net

From: [Anthony Sijohn](#)
To: [Gwinn, Nathan](#)
Subject: Support Our Shriners
Date: Tuesday, August 25, 2015 9:17:55 PM

I think it's a terrible idea for you to adopt the Comprehensive Plan Policy for the the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

The city should not limit El Katif's ability to appropriately manage Sans Souci for the best interest of the organization and the Spokane Shriners Children's Hospital.

Thank you for allowing me to weigh in as part of the democratic process. Please do the right thing and make sure the El Katif Shriners can continue to raise money for Shriners Hospital..


Sincerely,
Anthony Sijohn
[REDACTED]hotmail.com

From: [Leonard Woltersdorf](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Shriners Comprehensive Plan Policy
Date: Wednesday, August 26, 2015 6:46:46 AM

I can't believe that you are going to force the Sans Souci Mobile Home Park to remain nothing more than low-income housing forever. That's not a sensible idea.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

This is important to me and to our community. Please do the right thing and reject this amendment.


Sincerely,
Leonard Woltersdorf
bigplanet.com

From: [Jerry Gendreau](#)
To: [Gwinn, Nathan](#)
Subject: Don't allow a potential rezone of Sans Souci West
Date: Wednesday, August 26, 2015 10:35:49 AM

I want to make sure that the Spokane Shriners Children's Hospital can continue to provide good care for local kids. That's why I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

Your job is to look out for what's best for our community. I believe it's best for our community to support El Katif Shriners and the good works they do, especially in support of the Spokane Shriners Children's Hospital.

Thank you for your service to our community. I am confident you will do the right thing to protect the Shriners and future revenues for the children's hospital.

Sincerely,
Jerry Gendreau
comcsst.net

From: [Bob Valentine](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Wednesday, August 26, 2015 11:34:40 AM

I want to make sure that the Spokane Shriners Children's Hospital can continue to provide good care for local kids. That's why I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

Instead of considering proposals that would restrict what El Katif can do with its own private property, the city ought to be doing whatever it can to support the Shriners' good charitable works in our community.

Thank you for reading and for doing everything you can to support the El Katif Shriners.

Sincerely,
Bob Valentine
[REDACTED]gmail.com

From: [Tom Felton](#)
To: [Gwinn, Nathan](#)
Subject: Comprehensive Plan Policy targeted at Sans Souci hurts Shriners
Date: Wednesday, August 26, 2015 6:04:40 PM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

The city should not limit El Katif's ability to appropriately manage Sans Souci for the best interest of the organization and the Spokane Shriners Children's Hospital.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital.


Sincerely,
Tom Felton
[REDACTED]@aol.com

From: [Ed Rutledge](#)
To: [Gwinn, Nathan](#)
Subject: Don't allow a potential rezone of Sans Souci West
Date: Thursday, August 27, 2015 10:42:35 AM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

I appreciate your time and your service. Please do the right thing and drop this amendment.


Sincerely,
Ed Rutledge
q.com

From: [John A. Wiess](#)
To: [Gwinn, Nathan](#)
Subject: Shriners suffer with Comprehensive Plan Policy
Date: Thursday, August 27, 2015 9:56:09 PM

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and a majority of their giving benefits the local Children's Hospital which has been providing free medical (orthopedic, related muscle/bone deformities) since the 1920's. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Please do what's right. Please vote to reject this misguided rezone plan. Thank you for your time.


Sincerely,
John A. Wiess
comcast.net

From: [Sharon Ball](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Sans Souci West Comprehensive Plan Policy
Date: Saturday, August 29, 2015 1:38:45 PM

I'm writing today because I'm not sure why Spokane city officials would vote to restrict the amount of money the Shriners can raise for the Shriners Hospital.

Spokane is incredibly fortunate to have the El Katif Shriners here. They have a long track record of supporting the children's hospital and other worthy charities with money received from the Sans Souci Mobile Home Park.

I know that you care about this community. Thank you for reading my email and for doing what's best for the Shriners and not hurt the Shriners' ability to raise money for the children's hospital.

Sincerely,
Sharon Ball
yahoo.com

From: [Jay A. Smith](#)
To: [Gwinn, Nathan](#)
Subject: Say No to Proposed Mobile Home Park Re-Zoning
Date: Friday, September 04, 2015 8:25:54 PM

I am writing this in regards to your comprehensive plan on re-zoning mobile home parks as low income housing. Of course, I am very much against using private landowners, such as Sans Souci West Mobile Home Park, to fill your low income housing needs. Although there is a need for low income housing in Spokane, please do not destroy the private landowner and devalue the land at Sans Souci by changing the zoning to low income housing. Sans Souci land values would forever be restricted and Sans Souci would be restricted in the future to improve their revenues. Also, a commission would be established to evaluate Sans Souci on an annual basis and step in and tell Sans Souci how to run their business. Not only is this stealing land values, but the business becomes under government control. This is unacceptable!

I am a member of El Katif Shriners here in Spokane. I served as Potentate (President/CEO) of El Katif Shrine in 2011. El Katif Shriners are the owners of Sans Souci Mobile Home Park. I am very knowledgeable on the workings and operation of Sans Souci. El Katif Shriners is a fraternity of Shriners whose sole and only purpose is to raise funds for Shriners Hospitals (one of which is located in Spokane) and a Shriners Transportation Fund.

The Shriners Transportation Fund is established by raising money to transport children who need medical help to one of 22 Shrine Hospitals. Shriners Hospitals specialize in orthopedic care, burn care, spinal cord injuries, and cleft lip and palate. If the community of Spokane has a child with severe burn injuries, El Katif will fly that child and a parent or legal guardian to Sacramento, California or Houston or Galveston, Texas for treatment at NO cost to the families. This is very costly and runs in the tens of thousands of dollars. This is what Shriners do. We care for kids with revenue that we (Shriners) earn. The revenues from Sans Souci Mobile Home Park provides money to the fraternity, which in turn supports the Shriners Hospitals.

Shriners Hospitals for Children have treated well in excess of 1,000,000 children. One of our 22 hospitals is located right here in Spokane. We call it the crown jewel of the South Hill. When this Spokane Hospital needs something, El Katif does fundraisers to help fill the special needs. Right now El Katif Shriners are fundraising for a special x-ray machine called an Eose Machine. It would be the only x-ray machine of this type in the entire northwest, costing hundreds of thousands of dollars.

So, as you can see, we as El Katif Shriners do great things by fundraising for our hospital and transportation fund. Sans Souci West Mobile Home Park is a large source of that income that allows El Katif Shriners to meet our obligations to our Shriners Hospital network.

Please do not re-zone Sans Souci Mobile Home Park. It would not only be devastating to El Katif Shriners, but also to a child and family that needs our help.


Sincerely,
Jay A. Smith
[REDACTED]@hotmail.com

From: [Dale Hearn](#)
To: [Gwinn, Nathan](#)
Subject: El Katif Supports our Community
Date: Tuesday, September 08, 2015 12:24:40 PM

I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

Sans Souci Mobile Home Park income supports the operations of El Katif. The city should be very careful about rewriting the rules governing what the Shriners can or cannot do as property owners and as valuable members of our community.

Thank you for allowing me to speak out on this important issue. Please support the Shriners and reject this amendment.


Sincerely,
Dale Hearn
comcast.net

From: [Brent Oty](#)
To: [Gwinn, Nathan](#)
Subject: Protect El Katif investment potential
Date: Tuesday, September 08, 2015 12:30:09 PM

I'm writing today because I believe would be a mistake to adopt the proposed Comprehensive Plan Policy applicable to the Sans Souci Mobile Home Park.

Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and a majority of their giving benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Please consider all the facts and then vote against this amendment. I thank you and so will the Shriners.


Sincerely,
Brent Oty
comcast.net

From: [Ernest Miranda](#)
To: [Gwinn, Nathan](#)
Subject: El Katif Supports our Community
Date: Tuesday, September 08, 2015 12:34:43 PM

I think it's a terrible idea for you to adopt the Comprehensive Plan Policy for the the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and a majority of their giving benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Please do what's right for the Shriners and the good work they do.

Sincerely,
Ernest Miranda
 cableone.net

From: [Richard Sayre](#)
To: [Gwinn, Nathan](#)
Subject: RE: Please do not restrict use of Sans Souci mobile home park.
Date: Wednesday, September 09, 2015 10:40:14 AM

Thanks for your response, Nathan. We've been around a long time and we use the income from Sans Souci to do all that we do. If use is restricted, that will impact our ability to support our hospital and do the other millions of things Shriners do for Spokane.

I appreciate your consideration of my concerns.

Dick Sayre

From: Gwinn, Nathan [mailto:ngwinn@spokanecity.org]
Sent: Wednesday, September 9, 2015 10:33 AM
To: 'Richard Sayre' <[REDACTED]supportourshriners.com>; Richard Sayre <[REDACTED]sayrelaw.com>
Subject: RE: Please do not restrict use of Sans Souci mobile home park.

Good morning Mr. Sayre,

Thank you for your comment. I will add it to the public record for file Z1400065COMP, the manufactured home park preservation Comprehensive Plan text amendment.

For more information, please visit the web page for this application:
<http://my.spokanecity.org/projects/policy-re-manufactured-and-mobile-home-parks/>

Sincerely,

Nathan Gwinn | Assistant Planner | City of Spokane

509.625.6893 | ngwinn@spokanecity.org | www.spokanecity.org

From: Richard Sayre [[mailto:\[REDACTED\]@supportourshriners.com](mailto:[REDACTED]@supportourshriners.com)]
Sent: Tuesday, September 08, 2015 12:46 PM
To: Gwinn, Nathan
Subject: Please do not restrict use of Sans Souci mobile home park.


I'm worried that a plan to allow the City to rezone the Sans Souci Mobile Home Park will have unintended consequences for Spokane Shriners and the Spokane Shriners Children's Hospital.

The El Katif Shriners have a long track record of supporting the children's hospital. We are all incredibly lucky to have the El Katif Shriners here.

Spokane Shriners have long been involved in community activities and have given back to Spokane for decades - from being instrumental in the building the prior hospital to working aggressively with Shriners Hospitals to maintain the current facility. We sponsor activities

which allow patients to receive care at no cost to themselves, sparing the community millions of dollars in health care costs. Shriners participate in parades, actively take part in community programs and are a vital part of the fabric of Spokane. Sans Souci is the most important resource we have to make it happen.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter.


Sincerely,
Richard Sayre
 sayrelaw.com

From: [Gail Kalk](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Tuesday, September 08, 2015 1:04:35 PM

I'm writing today because I believe would be a mistake to adopt the proposed Comprehensive Plan Policy applicable to the Sans Souci Mobile Home Park.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

Thank you for considering my concerns. I hope you will agree that we need to do all we can do to support the Shriners.

Sincerely,
Gail Kalk
alliantsecurities.com

From: [Ben Kruse](#)
To: [Gwinn, Nathan](#)
Subject: Spokane supports Shriners Children's Hospital
Date: Tuesday, September 08, 2015 1:12:16 PM

I seldom write to city officials but I am today because this is important: Please stop the proposed Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

Your job is to look out for what's best for our community. I believe it's best for our community to support El Katif Shriners and the good works they do, especially in support of the Spokane Shriners Children's Hospital.

Thank you for reading my email. And please vote No on the Sans Souci amendment.

Sincerely,
Ben Kruse
[REDACTED] aol.com

From: [Jon Lind](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Tuesday, September 08, 2015 1:15:30 PM


I think it's a terrible idea for you to adopt the Comprehensive Plan Policy for the the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major funder of the Shriner's hospital. Don't do anything to interfere with that.

Thank you for what you do for our city. Please consider my email and reject this misguided amendment to the city's Comprehensive Plan.

Sincerely,

Jon Lind

centurytel.net

From: [Ronald R Green](#)
To: [Gwinn, Nathan](#)
Subject: Comprehensive Plan Policy limits Shriners" income
Date: Tuesday, September 08, 2015 1:43:48 PM

I can't believe that you are going to force the Sans Souci Mobile Home Park to remain nothing more than low-income housing forever. That's a dumb idea.

Under this Comprehensive Plan Policy, El Katif would never be able to add apartments or condominiums to the property or change the housing mix in any way to increase revenue.

I appreciate your time and your service. Please do the right thing and drop this amendment.


Sincerely,
Ronald R Green
[REDACTED]@gmail.com

From: [Melvin Neil](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Sans Souci West Comprehensive Plan Policy
Date: Tuesday, September 08, 2015 1:56:52 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park could have devastating consequences for the El Katif Shriners and the fundraising it does for Shriners Hospital.

Sans Souci Mobile Home Park has been owned and operated by El Katif for years. They've established an excellent living environment for park residents. But they should not be prohibited from selling or redeveloping the property if they think it is best.

Thank you for reading and for doing everything you can to support the El Katif Shriners.

Sincerely,
Melvin Neil
comcast.net

From: [Don Black](#)
To: [Gwinn, Nathan](#)
Subject: Oppose Sans Souci Comprehensive Plan Policy
Date: Tuesday, September 08, 2015 2:03:03 PM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Please don't support this zoning change. It's not right for the Shriners and it doesn't help low-income families who need charity most.

Sincerely,
Don Black

comcast.net

From: [Chrls Young](#)
To: [Gwinn, Nathan](#)
Subject: Shriners's projects will suffer with the City's proposed Comprehensive Plan Policy
Date: Tuesday, September 08, 2015 2:08:30 PM

Please reject any plan that would cut into the income that the El Katif Shriners receive from San Souci. The proposed Comprehensive Plan Policy will significantly impact the income from San Souci Community received by El Katif Shriners. Much of the money received by El Katif is used to support Shriners Hospital for Children-Spokane.

The El Katif Shriners have a long track record of supporting the children's healthcare. Shriners Hospital for Children has been an important part of the health care community in Spokane since the 1920's. We are all incredibly lucky to have the El Katif Shriners in Spokane. Not only do they support Shriners Hospitals for Children but contribute in many ways to the community.

Thank you for reading my email. The Shriners do important work in our community.

Sincerely,
Chrls Young

 COMCAST.NET

From: [Robert Lindgren](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci rental income supports El Katif Shriners
Date: Tuesday, September 08, 2015 3:12:57 PM


I seldom write to city officials but I am today because this is important: Please stop the proposed Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

I want to see the city support El Katif, the Shriners Children's Hospital and the charities it supports. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

Thank you for allowing me to speak out on this important issue. Please support the Shriners and reject this amendment.

In fact, I am thinking about moving to Sans Souci in the next 2 years.

Sincerely, Bob


Sincerely,
Robert Lindgren
frontier.com

From: [David Easley](#)
To: [Gwinn, Nathan](#)
Subject: Comprehensive Plan Policy limits Shriners' income
Date: Tuesday, September 08, 2015 3:38:41 PM

Please stop the proposed plan that would allow for the City to rezone the Sans Souci Mobile Home Park.

I agree providing housing for low- and moderate-income residents is a worthy goal but this is the wrong way to do it. The Shriners need this income from this property to support the Children's hospital. Restricting long term options for the property is not right. Please review and restructure this plan.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital.

Sincerely,
David Easley
 charter.net

From: [r](#)
To: [Gwinn, Nathan](#)
Subject: Don't allow a potential rezone of Sans Souci West
Date: Tuesday, September 08, 2015 3:44:25 PM


Lately I've heard that the city wants to forever limit what the El Katif Shriners can do with their own property. Don't do it.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

I appreciate your service to the city and the time you've spent on this issue. I hope you will reject this amendment.

Sincerely,

r

 charter.net

From: [Jesse.pew](#)
To: [Gwinn, Nathan](#)
Subject: Don't allow a potential rezone of Sans Souci West
Date: Tuesday, September 08, 2015 3:53:10 PM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

This Comprehensive Plan Policy proposal that will go before the Spokane City Planning Commission explicitly limits the amount of income the Shriners can derive from this property long-term and that means the amount of money available for local charities.

Thank you for allowing me to weigh in as part of the democratic process. Please do the right thing and make sure the El Katif Shriners can continue to raise money for Shriners Hospital..

Sincerely,
Jesse pew
[REDACTED]@yahoo.com

From: [Steve R Black](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Tuesday, September 08, 2015 4:34:44 PM

I want the city council to reject any plan that would cut into the income that the El Katif ShrineStrs receive.

It is important to remember that Sans Souci is an investment property that funds El Katif. El Katif is a major contributor to the Shriners Children's Hospital. Therefore Spokane must not do anything that could damage El Katif's ability to earn income from this property.

Please consider all the facts and then vote against this amendment. I thank you and so will the Shriners.


Sincerely,
Steve R Black
[REDACTED]yahoo.com

From: [David Campanella](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Tuesday, September 08, 2015 4:50:18 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park could have devastating consequences for the El Katif Shriners and the fundraising it does for Shriners Hospital.

Sans Souci Mobile Home Park income supports the operations of El Katif. The city should be very careful about rewriting the rules governing what the Shriners can or cannot do as property owners and as valuable members of our community.

Thank you for considering my concerns. I hope you will agree that we need to do all we can do to support the Shriners.

Sincerely,
David Campanella
msn.com

From: [Mike Harper](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Tuesday, September 08, 2015 7:53:09 PM

I'm writing today because I'm not sure why Spokane city officials would vote to restrict the amount of money the Shriners can raise for the Shriners Hospital.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Thank you for reading my email. And please vote No on the Sans Souci amendment.


Sincerely,
Mike Harper
[REDACTED]@aol.com

From: [Jerry Schieche](#)
To: [Gwinn, Nathan](#)
Subject: Spokane supports Shriners Children's Hospital
Date: Tuesday, September 08, 2015 10:40:50 PM

I have a hard time understanding why Spokane city officials would consider limiting the amount of income the El Katif Shriners can make off of land they've owned for years.

The Shriners have owned the Sans Souci property for years and re-invested rents in the fraternity to allow it to fundraise for the Children's Hospital where kids get the care they need regardless of their families' income or ability to pay.

Please do whatever you can to make sure that the Shriners can continue to fundraise for Shriners Children's Hospital.

Sincerely,
Jerry Schieche
centurylink.net

From: [Susanne Hartwell](#)
To: [Gwinn, Nathan](#)
Subject: Comprehensive Plan Policy limits Shriners' income
Date: Tuesday, September 08, 2015 10:59:55 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park is a shortsighted plan with potentially devastating long-term consequences.

The amount of income the Shriners can derive from this property they own is explicitly limited by a Comprehensive Plan amendment that will be in front of the Spokane City Planning Commission. Long-term, that means less money available for fundraising for Shriners Hospital.

I appreciate your time. It's important to me and to others in our community to support the Shriners and their good work.

Sincerely,
Susanne Hartwell
msn.com

From: [John Robertson](#)
To: [Gwinn, Nathan](#)
Subject: Shriners" main source of revenue is under attack
Date: Wednesday, September 09, 2015 5:53:25 AM

I think it's an extremely bad idea for you to adopt the Comprehensive Plan Policy for the the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

The city should not limit El Katif's ability to appropriately manage Sans Souci for the best interest of the organization and the Spokane Shriners Children's Hospital.

Thank you for reading and for doing everything you can to support the El Katif Shriners.


Sincerely,
John Robertson
[REDACTED]@gmail.com

From: [Linda Gray](#)
To: [Gwinn, Nathan](#)
Subject: Hands off Shriners" private property
Date: Wednesday, September 09, 2015 6:27:24 AM

I am writing because I'm concerned about what I hear about the city's attempt to put limits on the property owned by the El Katif Shriners.

Instead of considering proposals that would restrict what El Katif can do with its own private property, the city ought to be doing whatever it can to support the Shriners' good charitable works in our community.

Thank you for reading and for doing everything you can to support the El Katif Shriners.

Sincerely,
Linda Gray
comcast.net

From: [Bill Eberly](#)
To: [Gwinn, Nathan](#)
Subject: Shriners's projects will suffer with City's proposed Comprehensive Plan Policy
Date: Wednesday, September 09, 2015 7:01:33 AM

I think it's a terrible idea for you to adopt the Comprehensive Plan Policy for the the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

I want to see the city support El Katif, the Shriners Children's Hospital and the charities it supports. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

Thank you for reading my email. And please vote No on the Sans Souci amendment.

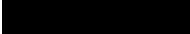
Sincerely,
Bill Eberly
[REDACTED]hotmail.com

From: [Gabe Thompson](#)
To: [Gwinn, Nathan](#)
Subject: Shriners's projects will suffer with City's proposed Comprehensive Plan Policy
Date: Wednesday, September 09, 2015 7:11:12 AM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

The Shriners have owned the Sans Souci property for years and re-invested rents in the fraternity to allow it to fundraise for the Children's Hospital where kids get the care they need regardless of their families' income or ability to pay.

I know that you care about this community. Thank you for reading my email and for doing what's best for the Shriners and not hurt the Shriners' ability to raise money for the children's hospital.

Sincerely,
Gabe Thompson
live.com

From: [Judith A Eberly](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Wednesday, September 09, 2015 7:37:15 AM

I'm writing to you today because I think the city is wrong to even consider a potential rezone of the Sans Souci Mobile Home Park.

I want to see the city support El Katif, the Shriners Children's Hospital and the charities it supports. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter.

Sincerely,
Judith A Eberly
[REDACTED]hotmail.com

From: [jerry harp](#)
To: [Gwinn, Nathan](#)
Subject: Mobile Home goal hurts Shriners
Date: Wednesday, September 09, 2015 8:23:22 AM

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

The biggest source of income for the El Katif Shriners is the Sans Souci Mobile Home Park. Spokane officials should be careful about rewriting the rules about what the Shriners can do with the property they own.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city.

Sincerely,
jerry harp

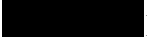
 wildblue.net

From: [David L Swannack](#)
To: [Gwinn, Nathan](#)
Subject: Sans Souci rental income supports El Katif Shriners
Date: Thursday, September 10, 2015 2:50:52 PM

I can't believe that you are going to force the Sans Souci Mobile Home Park to remain nothing more than low-income housing forever. That's a dumb idea.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Thank you for reading and for doing everything you can to support the El Katif Shriners.

Sincerely,
David L Swannack
 pionnetwb.com

From: [Elaine kimberling](#)
To: [Gwinn, Nathan](#)
Subject: Protect the Shriners Children's Hospital
Date: Thursday, September 10, 2015 7:49:35 PM

I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major funder of the Shriner's hospital. Don't do anything to interfere with that.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter.

Sincerely,
Elaine kimberling
comcast.net

From: [Herb Postlewait](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Friday, September 11, 2015 3:43:40 PM

Lately I've heard that the city wants to forever limit what the El Katif Shriners can do with their own property. Don't do it.

Sans Souci Mobile Home Park has been owned and operated by El Katif for years. They've established an excellent living environment for park residents. But they should not be prohibited from selling or redeveloping the property if they think it is best.

We have no intention of limiting other multi family property owners options for the use of their property, now or in the future. We would appreciate not limiting our options, either. There is no reason to revise the zoning of our (my, as a member of El Katif) property.

I appreciate your time and your service. Please do the right thing and drop this amendment.

Sincerely,
Herb Postlewait
herb-[REDACTED]comcast.net

From: [Herb Postlewait](#)
To: [Gwinn, Nathan](#)
Subject: Oppose Sans Souci Comprehensive Plan Policy
Date: Friday, September 11, 2015 3:44:44 PM

Lately I've heard that the city wants to forever limit what the El Katif Shriners can do with their own property. Don't do it.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital.

Please do what's right. Please vote to reject this misguided rezone plan. Thank you for your time.

Sincerely,
Herb Postlewait
herb-[REDACTED]comcast.net

From: [Robert Valentine](#)
To: [Gwinn, Nathan](#)
Subject: Don't allow a potential rezoning of Sans Souci West
Date: Friday, September 11, 2015 6:04:33 PM

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

The El Katif Shriners have a long track record of supporting the children's hospital. We are all incredibly lucky to have the El Katif Shriners here.

I appreciate your time. It's important to me and to others in our community to support the Shriners and their good work.


Sincerely,
Robert Valentine
[REDACTED]@yahoo.com

From: [james kirkpatrick](#)
To: [Gwinn, Nathan](#)
Subject: Support Shriners Children's Hospital
Date: Monday, September 14, 2015 11:25:02 AM

Please reject a proposed Comprehensive Plan Policy for the Sans Souci Mobile Home Park.

The El Katif Shriners have a long track record of supporting the children's hospital. We are all incredibly lucky to have the El Katif Shriners here.

Please don't support this zoning change. It's not right for the Shriners and it doesn't help low-income families who need charity most.

Sincerely,
james kirkpatrick
columbiainet.com

From: [b.bailey](#)
To: [Gwinn, Nathan](#); [Stum, Blaine](#); [Snyder, Jon](#)
Subject: Manufactured Home Comprehensive Plan Text Amendment
Date: Tuesday, September 22, 2015 1:32:48 PM

Hello Nathan, Jon, and Blaine,

I want to thank all of you for all of your hard work that you have invested in this project. I will not be able to attend the public hearing regarding this matter due to other obligations. I am sending this email in regards to my input on this subject.

I support the request to have this proposal put on the 2016 Work program so that further investigations and study's be conducted, in an effort to make a well informed decision.

This should be an effortless proposal if all involved would have left their personal agenda's at the door and worked towards a common goal.

Landowners need to understand that they have chosen to use their land as a business, and in doing so they have certain protocol's to abide by. They should be held accountable to the same standards as apartment, duplex, and other rental dwellings. As I have stated before, these landowners prey on the elderly, low income, and uneducated sector of society. This is a very complex situation due to the fact that a majority of people living in manufactured housing own their home and are merely renting the land that it sits on. If one were renting an apartment they would never sign a lease that states that the owner can sell, transfer, or close the unit at any time. So why is it acceptable for manufactured home landowners to conduct business in this manner?

Several of our residents purchased their homes for a variety of reasons. They have downsized while still being a homeowner, they want a low maintenance household to accommodate their physical limitations, or they are striving for affordable home ownership in their retirement to remain independent. There should never be a threat looming over them that they might have to move their home at their expense or pay to have their home destroyed.

Landowners should be offered incentives that other low income property owners receive in an effort to keep costs down and maintain affordable housing choices.

I have confidence that the planning commission with added time will be able to address all housing options as well as manufactured homes. Manufactured housing is a unique situation, the landowners and the homeowners both have an investment, therefore some type of a process should be adopted so that neither party has more power than other. Both parties should be working together to insure financial gain for landowners and a sense of security for homeowners.

Thanks again for all your work on this proposal and hopefully with extra time the differences can be worked out and a logical solution can be formed.

Sincerely,
Brenda Bailey
President
Cascade Community Homeowners Alliance



September 23, 2015

City of Spokane Planning Commission
808 W. Spokane Falls Blvd.
Spokane, Washington 99201-3329

**Re: Comprehensive Plan Text Amendment
Z-140065COMP**

Dear Mr. President and Members of the City Planning Commission:

This letter is submitted on behalf of Cascade Manufactured Home Community, located at 2311 W. 16th Avenue, between US-195 and Inland Empire Way. The Community contains 283 homes with a Clubhouse, Fitness Center, Heated Pool (plus Hot Tub and Sauna), Business Center, Free Wi-Fi and other amenities. It was constructed in 1970 and is age restricted to persons who are over 55 years old. Demographically, there is a wide range of lifestyles and incomes.

Cascade opposes the proposed Comprehensive Plan Text Amendment.

1. City of Spokane Staff Report. The following are concerns with regard to the City of Spokane Staff Report. By way of summary section V entitled "Conclusions" fails to properly apply of the Growth Management Act and the Spokane Municipal Code when reviewing a comprehensive plan amendment.

A. Internal Consistency. Subsection V(B) according to SMC 17G.020.02.030(E) requires internal consistency. Staff concludes:

The proposal is consistent with all supporting documents of the comprehensive plan. The proposed change to the text does not specify that a change to regulations is required.

WAC 365-196-500 defines "internal consistency", as follows: "differing parts of the comprehensive plan must fit together so that no one feature precludes the achievement of any other." *Id.* Further, a city "must use compatible assumptions in different aspects of the plan." *Id.* Here, the City of Spokane has not addressed housing policy H 3.5 which requires an annual housing report be provided to the City Plan Commission that "monitors progress toward achieving the housing goals and includes recommended policy change if positive direction towards achieving the housing goals is not occurring." (Emphasis added). This goal assumes that

September 23, 2015

Page 2

there will be specific affordable housing data within the City that relates to the proposed action. Such data would presumably support the proposed action and its application to specifically identified properties. Here, the proposed Comprehensive Plan amendment has not taken into consideration this existing requirement and thus it is impossible to tell whether the proposal is internally consistent.

In addition, Staff concludes a comprehensive plan text change does not require a change to associated regulations. This is incorrect. WAC 165-196-500 states that "development regulations must be internally consistent and be consistent with and implement the comprehensive plan." *Id.* See also RCW 36.70.040(4) which repeats the above requirement. Thus, the next step, if this amendment is approved, would be to adopt development regulations (zoning).

B. "Consistent Amendments." Subsection V(K) under SMC 17G.020.030(K) provides that policy amendments, such as this one, should "provide correction or additional guidance" to better achieve "the community's original visions and values." In general, such "corrections" or "additional guidance" should be supported by findings from "feedback instruments related to monitoring and evaluating the implementation of the comprehensive plan". Id. Further, there are examples of how to obtain such findings to support the proposed amendment. Here, the City has wholly failed to provide relevant, local, documentation to support this proposal especially in light of the existing requirements set forth in the comprehensive plan.

2. Conclusion. The proposed amendment seeks to impose an affordable housing requirement on selected mobile home communities without regard to their existing use, demographics, and policies of the comprehensive plan. For the reasons set forth above as well as the previous testimony and documents in the record, the Plan Commission is requested to deny this proposal and adopt the August 18, 2015 Plan Commission Sub-Committee Report.

Very truly yours,

WITHERSPOON • KELLEY



Stanley M. Schwartz

SMS/kh


Cc: Gary Griglak

From: [Randall Ader](#)
To: [Gwinn, Nathan](#)
Subject: Vote No! on Shriners Comprehensive Plan Policy
Date: Thursday, October 08, 2015 10:00:29 PM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major funder of the Shriner's hospital. Don't do anything to interfere with that.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital.

Sincerely,
Randall Ader
meridian.ws

From: [Bill Eberly](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Protect El Katif investment potential
Date: Wednesday, October 28, 2015 11:26:55 AM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will will hurt the El Katif Shriners.

Instead of considering proposals that would restrict what El Katif can do with its own private property, the city ought to be doing whatever it can to support the Shriners. Spokane is incredibly fortunate to have the El Katif Shriners here. They have a long track record of supporting the children's hospital. I want to see the city support El Katif, and the fundraising efforts for the Shriners Children's Hospital. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

Thank you for reading my email. And please vote No on the Sans Souci amendment. Please affirm the recommendation from the Planning Commission.

Sincerely,
Bill Eberly
2840

From: [Bob Brockman](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Vote No! on Shriners comprehensive plan goal
Date: Wednesday, October 28, 2015 11:30:23 AM

Please support our Shriners by rejecting a proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

Thank you for what you do for our city. Please consider my email and reject this misguided amendment to the City's Comprehensive Plan.

Sincerely,
Bob Brockman
[REDACTED]@yahoo.com

From: [Doc Williams](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Comprehensive Plan Goal Targeted at Sans Souci hurts Shriners
Date: Wednesday, October 28, 2015 11:33:57 AM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

Please affirm the recommendation from the Planning Commission.

Sincerely,

Doc Williams


outlook.com

From: [Lawrence Allan Coulson](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: El Katif Supports our Community
Date: Wednesday, October 28, 2015 11:35:04 AM

I can't believe that you are going to force the Sans Souci Mobile Home Park to remain nothing more than low-income housing forever. That's a dumb idea.

This proposal by the Spokane City Council directly threatens future income derived from Sans Souci threatening the existence of El Katif itself and, as a consequence, future funding for the Shriners Children's Hospital.

Please affirm the recommendation from the Planning Commission.

Sincerely,
Lawrence Allan Coulson
cdametals.com

From: [Marc Johnston](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Support El Katif Shriners
Date: Wednesday, October 28, 2015 11:37:41 AM

I have never written to city officials but I am today because this is important: Please stop the proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

The biggest source of income for the El Katif Shriners is the Sans Souci Mobile Home Park. Spokane officials should be careful about rewriting the rules about what the Shriners can do with the property they own.

Thank you for reading my email. The Shriners do important work in our community. Please allow them to continue to do this work and adopt the recommendation from the Planning Commission.

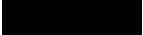
Sincerely,
Marc Johnston
[REDACTED]@gmail.com

From: [Jodi kolb](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Mobile Home Goal hurts Shriners
Date: Wednesday, October 28, 2015 11:38:04 AM

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

I agree providing housing for low- and moderate-income residents is a worthy goal but this is the wrong way to do it. The Shriners need this income from this property to support the fundraising efforts for the Children's hospital.

Thank you for reading my email. And please vote No on the Sans Souci amendment. Please affirm the recommendation from the Planning Commission.


Sincerely,
Jodi kolb
hotmail.com

From: [James Stewart](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Sans Souci's potential rezone hurts El Katif Shriners
Date: Wednesday, October 28, 2015 11:47:04 AM

I'm writing today because I'm not sure why Spokane city officials would vote to restrict the amount of money the Shriners can raise for the Shriners Hospital.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major fundraiser for to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

Please support the El Katif Shriners and the good works they do. Thank you for your time. We ask that you adopt the recommendation of the Planning Commission.


Sincerely,
James Stewart
hughes.net

From: [Michele Stewart](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Wednesday, October 28, 2015 11:47:39 AM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park is a shortsighted plan with potentially devastating long-term consequences.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

Please do what's right for the Shriners and the good work they do. Please affirm the recommendation from the Planning Commission.

Sincerely,
Michele Stewart
 hughes.net

From: [Ashley Stewart](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Wednesday, October 28, 2015 11:48:32 AM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

While having low and moderate income housing in Spokane is a worthy goal, mandating land owners (no matter who they are) to maintain this designation for perpetuity is simply not right. City officials are off-target on this one.

Thank you for reading and for doing everything you can to support the El Katif Shriners. Please affirm the recommendation from the Planning Commission.

Sincerely,
Ashley Stewart
[REDACTED]yahoo.com

From: [Leonard](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners" projects will suffer with City"s proposed Comprehensive Plan goal
Date: Wednesday, October 28, 2015 11:56:34 AM

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

This Comprehensive plan goal proposal that will go before the City Council explicitly limits the amount of income the Shriners can derive from this property long-term and that means the amount of money available for the fraternity to do fundraising for Shriners Hospital.

Please do what's right for the Shriners and the good work they do. Please affirm the recommendation from the Planning Commission.

Sincerely,

Leonard


bigplanet.com

From: [William E.Frandsen](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Support Our Shriners
Date: Wednesday, October 28, 2015 12:00:28 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park is a shortsighted plan with potentially devastating long-term consequences.

Instead of considering proposals that would restrict what El Katif can do with its own private property, the city ought to be doing whatever it can to support the Shriners. Spokane is incredibly fortunate to have the El Katif Shriners here. They have a long track record of supporting the children's hospital. I want to see the city support El Katif, and the fundraising efforts for the Shriners Children's Hospital. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

I appreciate your time and your service. The Planning Commission's recommendation was correct, please do the right thing and drop this amendment.

Sincerely,
William E. Frandsen
comcast.net

From: [Roger Gehrig](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Support Our Shriners
Date: Wednesday, October 28, 2015 12:05:32 PM

I'm writing to you today because I think the city is wrong to even consider a potential rezone of the Sans Souci Mobile Home Park.

The biggest source of income for the El Katif Shriners is the Sans Souci Mobile Home Park. Spokane officials should be careful about rewriting the rules about what the Shriners can do with the property they own.

Thank you for reading my email. The Shriners do important work in our community. Please allow them to continue to do this work and adopt the recommendation from the Planning Commission.

Sincerely,
Roger Gehrig
Pote08.█gmail.com

From: [Robert Carter](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Protect the El Katif Shriner's Fundraising Efforts for Shriners Children's Hospital
Date: Wednesday, October 28, 2015 12:22:42 PM

I am writing because I want to make sure that the plan now under consideration to rezone the Sans Souci Mobile Home Park is rejected.

While providing housing for low- and moderate-income residents is a worthy goal which El Katif has supported for a very long time through the San Souci Mobile Home Park, it is completely inappropriate to force El Katif to do so forever. Low income housing is both a public and private concern, but government should not be able to force a private organization to provide low-income housing. This is a good example of government overreaching it's authority, given to it by the people it governs. In my opinion, what you're contemplating is completely against the principles under which the United States was founded.

As I understand the proposed changes to the Comprehensive Plan, El Katif's hands would be tied regarding any future changes they would like to make with the property. . .even improvements to increase the number of low income units, such as apartments. That makes no sense!

As a private organization actively involved in philanthropic endeavors, Sans Souci is one of El Katif's primary sources of income. The income generated from Sans Souci directly benefits the Shriner's Hospital in Spokane where children receive excellent care regardless of their family's ability to pay. This commitment continues even as the cost of providing this care grows each year.

Under this Comprehensive Plan goal, El Katif would never be able to add apartments or condominiums to the property or change the housing mix in any way to increase revenue and contribute more to the needs of disabled children.

You may notice that I now live in Port Orchard, Washington, and wonder why I would be concerned about what you're doing in Spokane. My wife Ardath and I lived in Spokane for 57 years. I joined the Masons as a young man in Wisconsin, and increased my involvement in several Masonic organizations, including El Katif, after moving to Spokane. I am still a member of El Katif, Scottish Rite, and the Manito Masonic Lodge. I was Potentate of El Katif in 1992, and as a result have a clear understanding of the organization's financial structure and of the Sans Souci Mobile Home Park. We moved to Western Washington to be closer to our family, and moved into the home of one of our daughter's when we were no longer able to live independently. We would have preferred to remain in Spokane. My wife has passed away and I'm now 91, but I continue to keep up to date on what's happening with El Katif, the other organizations I belong to, and our remaining friends there.

Thank you for considering my concerns. I hope you will agree that we need to do all we can do to support the Shriners and prevent government from taking over the rights of private organizations. The Planning Commission understood El Katif's concerns, and we ask that the City Council does the same.


Sincerely,
Robert Carter

From: [Ernest Miranda](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners suffer with City's Comprehensive Plan goal
Date: Wednesday, October 28, 2015 12:33:00 PM

I seldom write to city officials but I am today because this is important: Please stop the proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

This proposal by the Spokane City Council directly threatens future income derived from Sans Souci threatening the existence of El Katif itself and, as a consequence, future funding for the Shriners Children's Hospital.

Thank you for allowing me to speak out on this important issue. Please support the Shriners and reject this amendment. The Planning Commission made the right decision, please affirm it!

Sincerely,
Ernest Miranda
cableone.net

From: [Frederick Wertman](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: "Fair" housing plan isn't fair to Shriners
Date: Wednesday, October 28, 2015 12:36:35 PM

I seldom write to city officials but I am today because this is important: Please stop the proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital.

This is important to me and to our community, so please support the Planning Commission's decision. Please do the right thing and reject this amendment.


Sincerely,
Frederick Wertman
[REDACTED]comcast.net

From: [Andy Anderson](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Support El Katif Shriners
Date: Wednesday, October 28, 2015 12:38:48 PM

I'm worried that a plan to allow the City to rezone the Sans Souci Mobile Home Park will have unintended consequences for the El Katif Shriner's and their fundraising efforts for Spokane Shriners Children's Hospital. I believe it's just plain wrong for the city to adopt a Comprehensive Plan goal allowing a rezone of the Sans Souci Mobile Home Park and forever limit the amount of money the Shriners can get from the property.

This proposal by the Spokane City Council directly threatens future income derived from Sans Souci threatening the existence of El Katif itself and, as a consequence, future funding for the Shriners Children's Hospital.

Please don't support this zoning change. It's not right for the Shriners and it doesn't help low-income families who need charity most. Please send a positive message and affirm the recommendation from the Planning Commission.


Sincerely,
Andy Anderson
 charter.net

From: [Charlton Winchester](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't allow for a potential rezone of Sans Souci West
Date: Wednesday, October 28, 2015 12:46:18 PM

I think it's a terrible idea for you to adopt the Comprehensive Plan goal for the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major fundraiser of the Shriner's hospital. Don't do anything to interfere with that.

Thank you for reading my email. And please vote No on the Sans Souci amendment. Please affirm the recommendation from the Planning Commission.

Sincerely,
Charlton Winchester
@aol.com

From: [jim Williams](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: "Fair" housing plan isn't fair to Shriners
Date: Wednesday, October 28, 2015 12:50:07 PM

Add mine name to the list of those who are sending you this message. The Shriners do so much for this community and this area and deserve this consideration.

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

I agree providing housing for low- and moderate-income residents is a worthy goal but this is the wrong way to do it. The Shriners need this income from this property to support the fundraising efforts for the Children's hospital.

Please do whatever you can to make sure that the Shriners can continue to fundraise for Shriners Children's Hospital. Please show your support and affirm the recommendation of the Planning Commission.

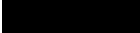
Sincerely,
jim Williams
[REDACTED]hotmail.com

From: [Al Conetto](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Wednesday, October 28, 2015 1:20:12 PM

Please reject a proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

I thank you and I know that local families will thank you for doing the right thing and supporting the El Katif Shriners. Please support the recommendation from the Planning Commission.

Sincerely,
Al Conetto
 charter.net

From: [HARVEY MACQUARRIE](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners" main source of revenue is under attack
Date: Wednesday, October 28, 2015 1:20:28 PM

Spokane's Shriners ability to support Shriner's Hospital will suffer if a proposed Comprehensive Plan goal is adopted permitting a rezone of the Sans Souci Mobile Home Park.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city. Please allow the El Katif Shriners to continue to do positive work and adopt the recommendation from the Planning Commission.

Sincerely,
HARVEY MACQUARRIE
CHENEY

From: [James Ball](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Protect the El Katif Shriner's Fundraising Efforts for Shriners Children's Hospital
Date: Wednesday, October 28, 2015 1:21:38 PM

I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital.

I appreciate your time and your service. The Planning Commission's recommendation was correct, please do the right thing and drop this amendment.

Sincerely,
James Ball
[REDACTED]@yahoo.com

From: [Robert Valentine](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Vote No! on Sans Souci West comprehensive plan goal
Date: Wednesday, October 28, 2015 1:42:16 PM

Please stop the proposed plan that would allow for the City to rezone the Sans Souci Mobile Home Park.

The Shriners have owned the Sans Souci property for years and re-invested rents in the fraternity to allow it to fundraise for the Children's Hospital where kids get the care they need regardless of their families' income or ability to pay.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city. Please allow the El Katif Shriners to continue to do positive work and adopt the recommendation from the Planning Commission.

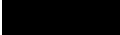
Sincerely,
Robert Valentine
[REDACTED]@yahoo.com

From: [Melvin Neil](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Protect the El Katif Shriner's Fundraising Efforts for Shriners Children's Hospital
Date: Wednesday, October 28, 2015 2:18:26 PM

Spokane's Shriners ability to support Shriner's Hospital will suffer if a proposed Comprehensive Plan goal is adopted permitting a rezone of the Sans Souci Mobile Home Park.

Sans Souci Mobile Home Park has been owned and operated by El Katif for years. They've established an excellent living environment for park residents. But they should not be prohibited from selling or redeveloping the property if they think it is best.

Thank you for reading my email. The Shriners do important work in our community. Please allow them to continue to do this work and adopt the recommendation from the Planning Commission.

Sincerely,
Melvin Neil
comcast.net

From: [Richard](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Sans Souci's potential rezone hurts El Katif Shriners
Date: Wednesday, October 28, 2015 2:27:35 PM

Please stop the proposed plan that would allow for the City to rezone the Sans Souci Mobile Home Park.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

Please support the El Katif Shriners and the good works they do. Thank you for your time. We ask that you adopt the recommendation of the Planning Commission.

Sincerely,
Richard


gmail.com

From: [Richard](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't allow for a potential rezone of Sans Souci West
Date: Wednesday, October 28, 2015 2:28:15 PM

I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital. The Planning Commission's decision was right, please support their recommendation.

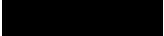
Sincerely,
Richard
gmail.com

From: [Jerry Gendreau](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Support El Katif Shriners
Date: Wednesday, October 28, 2015 2:37:48 PM

I'm worried that a plan to allow the City to rezone the Sans Souci Mobile Home Park will have unintended consequences for the El Katif Shriner's and their fundraising efforts for Spokane Shriners Children's Hospital. I believe it's just plain wrong for the city to adopt a Comprehensive Plan goal allowing a rezone of the Sans Souci Mobile Home Park and forever limit the amount of money the Shriners can get from the property.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

I appreciate your service to the city and the time you've spent on this issue. I hope you will reject this amendment. Please support the recommendation from the Planning Commission.

Sincerely,
Jerry Gendreau
comcast.net

From: [Thomas Youmans](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Wednesday, October 28, 2015 2:39:35 PM

Lately I've heard that the city wants to forever limit what the El Katif Shriners can do with their own property. Don't do it.

The city should not limit El Katif's ability to appropriately manage Sans Souci for the best interest of the organization and the fundraising for Spokane Shriners Children's Hospital.

Thank you for reading and for doing everything you can to support the El Katif Shriners. Please affirm the recommendation from the Planning Commission.


Sincerely,
Thomas Youmans
13113 N. Palomino Ln

From: [David Campanella](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Wednesday, October 28, 2015 2:53:06 PM

I'm writing today because I'm not sure why Spokane city officials would vote to restrict the amount of money the Shriners can raise for the Shriners Hospital.

Under this Comprehensive Plan goal, El Katif would never be able to add apartments or condominiums to the property or change the housing mix in any way to increase revenue.

I appreciate your service to the city and the time you've spent on this issue. I hope you will reject this amendment. Please support the recommendation from the Planning Commission.


Sincerely,
David Campanella
msn.com

From: [Robert & Lula Schroder](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Wednesday, October 28, 2015 3:23:50 PM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter. Please show your support for these families affirm the recommendation from the Planning Commission.

Sincerely,
Robert & Lula Schroder
centurylink.net

From: [Scott West](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't allow for a potential rezone of Sans Souci West
Date: Wednesday, October 28, 2015 3:47:06 PM

I seldom write to city officials but I am today because this is important: Please stop the proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital. The Planning Commission's decision was right, please support their recommendation.

Sincerely,
Scott West
miller_ [REDACTED] roadrunner.com

From: [Rodney Schmidt](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Support El Katif Shriners
Date: Wednesday, October 28, 2015 4:02:13 PM

I want to make sure that the El Katif Shriners can continue to fundraise for Spokane Shriners Children's Hospital and the hospital continue to provide good care for local kids. That's why I want the Planning Commission to reject any plan that would cut into the income that the El Katif Shriners receive. I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major fundraiser for to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

I thank you and I know that local families will thank you for doing the right thing and supporting the El Katif Shriners. Please support the recommendation from the Planning Commission.


Sincerely,
Rodney Schmidt
r32044Aolcom

From: [John Pasteur](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: El Katif Supports our Community
Date: Wednesday, October 28, 2015 4:30:26 PM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

The biggest source of income for the El Katif Shriners is the Sans Souci Mobile Home Park. Spokane officials should be careful about rewriting the rules about what the Shriners can do with the property they own.

Please affirm the recommendation from the Planning Commission.

Sincerely,
John Pasteur
comcast.net

From: [Tom Felton](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners" projects will suffer with City"s proposed Comprehensive Plan goal
Date: Wednesday, October 28, 2015 6:01:06 PM

I am writing because I want to make sure that a plan allow for a potential rezone of the Sans Souci Mobile Home Park is rejected.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city. Please allow the El Katif Shriners to continue to do positive work and adopt the recommendation from the Planning Commission.

Sincerely,
Tom Felton
[REDACTED]@aol.com


From: [Mr. & Mrs. John A. Wiess](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Comprehensive Plan Goal Targeted at Sans Souci hurts Shriners
Date: Wednesday, October 28, 2015 7:59:04 PM

We are writing to tell the city that we believe it a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital. After all, while it is increasingly expensive for the Shrine members, it is....and will always be....free to our patients.

Thank you for considering our concerns. I hope you will agree that the community and the City government need to do all we can do to support the Shriners. The Planning Commission understood El Katif's concerns, and we respectfully ask that the City Council does the same.

Sincerely, John and Gerry Wiess

Sincerely,
Mr. & Mrs. John A. Wiess
comcast.net

From: [Richard Dawe](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners' projects will suffer with City's proposed Comprehensive Plan goal
Date: Wednesday, October 28, 2015 10:50:39 PM

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

Instead of considering proposals that would restrict what El Katif can do with its own private property, the city ought to be doing whatever it can to support the Shriners. Spokane is incredibly fortunate to have the El Katif Shriners here. They have a long track record of supporting the children's hospital. I want to see the city support El Katif, and the fundraising efforts for the Shriners Children's Hospital. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

Thank you for reading my email. And please vote No on the Sans Souci amendment. Please affirm the recommendation from the Planning Commission.

Sincerely,
Richard Dawe
[REDACTED]comcast.net

From: [Duane Cook](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Oppose Sans Souci plan
Date: Thursday, October 29, 2015 11:12:10 AM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

It is important to remember that Sans Souci is an investment property that funds El Katif's operations.. El Katif is a major fundraiser for the Shriners Children's Hospital. Therefore Spokane must not do anything that could damage El Katif's ability to earn income from this property.

Thank you for reading my email. And please vote No on the Sans Souci amendment. Please affirm the recommendation from the Planning Commission.

Sincerely,
Duane Cook


theoffice.com

From: [Bright M. Bowe](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: The Rezoning of San Souci.....
Date: Thursday, October 29, 2015 11:20:30 AM

I'm worried that a plan to allow the City to rezone the Sans Souci Mobile Home Park will have unintended consequences for the El Katif Shriner's and their fundraising efforts for Spokane Shriners Children's Hospital. I believe it's just plain wrong for the city to adopt a Comprehensive Plan goal allowing a rezone of the Sans Souci Mobile Home Park and forever limit the amount of money the Shriners can get from the property.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major fundraiser for to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

This is important to me and to our community, so please support the Planning Commission's decision. Please do the right thing and reject this amendment. With the interest of Children who's parents who are unable to pay and our ability to treat as we have over the last 75 years, I as a past Director and Board Member of El Katif Shriner's, I cannot comprehend the thinking of the City of Spokane. Who's going to do this if you change our fundraising efforts? Please don't change something that's not necessary. Sincerely, Bright Bowe

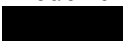
Sincerely,
Bright M. Bowe
 charter.net

From: [Frederic Anderson](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: "Fair" housing plan isn't fair to Shriners
Date: Friday, October 30, 2015 10:26:00 AM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

I thank you and I know that local families will thank you for doing the right thing and supporting the El Katif Shriners. Please support the recommendation from the Planning Commission.

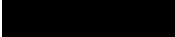
Sincerely,
Frederic Anderson
 charter.net

From: [Jimmy Stewart](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: El Katif Supports our Community
Date: Friday, October 30, 2015 10:29:30 AM

I'm sending you this email because I wonder if the City of Spokane knows what it's doing with the Sans Souci Mobile Home Park and whether you know the Comprehensive Plan goal before you will hurt the El Katif Shriners.

Sans Souci Mobile Home Park income supports the operations of El Katif. The city should be very careful about rewriting the rules governing what the Shriners can or cannot do as property owners and as valuable members of our community.

Please don't support this zoning change. It's not right for the Shriners and it doesn't help low-income families who need charity most. Please send a positive message and affirm the recommendation from the Planning Commission.

Sincerely,
Jimmy Stewart
 hughes.net

From: [James Berdal](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners" main source of revenue is under attack
Date: Friday, October 30, 2015 10:32:26 AM

Please support our Shriners by rejecting a proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital.

I thank you and I know that local families will thank you for doing the right thing and supporting the El Katif Shriners. Please support the recommendation from the Planning Commission.

Sincerely,
James Berdal
[REDACTED]yahoo

From: [David L Swannack](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners suffer with City's Comprehensive Plan goal
Date: Friday, October 30, 2015 10:34:08 AM

Spokane's Shriners ability to support Shriner's Hospital will suffer if a proposed Comprehensive Plan goal is adopted permitting a rezone of the Sans Souci Mobile Home Park.

Your job is to look out for what's best for our community. I believe it's best for our community to support El Katif Shriners and the good works they do, especially in support of the Spokane Shriners Children's Hospital.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter. Please show your support for these families affirm the recommendation from the Planning Commission.


Sincerely,
David L Swannack
[REDACTED]@gmail.com

From: [Ron Green](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: "Fair"; housing plan isn't fair to Shriners
Date: Friday, October 30, 2015 10:44:28 AM

I am writing because I want to make sure that a plan allow for a potential rezone of the Sans Souci Mobile Home Park is rejected.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

Thank you for reading my email. The Shriners do important work in our community. Please allow them to continue to do this work and adopt the recommendation from the Planning Commission.


Sincerely,
Ron Green
gmail.com

From: [Jon Lind](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners' projects will suffer with City's proposed Comprehensive Plan goal
Date: Friday, October 30, 2015 10:44:54 AM

A proposed Comprehensive Plan amendment applicable to the Sans Souci Mobile Home Park may sound like a good idea, but it isn't.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

Please vote no on the Sans Souci amendment. Thank you for your time and for all that you do for our city. Please allow the El Katif Shriners to continue to do positive work and adopt the recommendation from the Planning Commission.

Sincerely,
Jon Lind
centurytel.net

From: [Dean Oakes](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Oppose Sans Souci comprehensive plan goal
Date: Friday, October 30, 2015 10:58:21 AM


I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

While having low and moderate income housing in Spokane is a worthy goal, mandating land owners (no matter who they are) to maintain this designation for perpetuity is simply not right. City officials are off-target on this one.

I appreciate your time and your service. The Planning Commission's recommendation was correct, please do the right thing and drop this amendment.

Nathan, have you weighed the cost of this plan to the community, its children and adults, fully? Surely there is a win-win situation somewhere else and the Sans Souci plan can be shelved. Thanks you,

Dean & Darlene Oakes

Sincerely,
Dean Oakes
comcast.net

From: [Dick Hines](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Oppose Sans Souci comprehensive plan goal
Date: Friday, October 30, 2015 11:09:16 AM

Please reject a proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

Thank you for allowing me to weigh in as part of the democratic process. Please do the right thing and make sure the El Katif Shriners can continue to raise money for Shriners Hospital. Please allow them to continue to use Sans Souci to support their charitable efforts and affirm the recommendation from the Planning Commission.

Sincerely,
Dick Hines
D

From: [Howard Wynia](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Comprehensive Plan Goal Targeted at Sans Souci hurts Shriners
Date: Friday, October 30, 2015 11:34:54 AM

I want the city council to reject any plan that would cut into the income that the El Katif Shriners receive.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

Thank you for allowing me to weigh in as part of the democratic process. Please do the right thing and make sure the El Katif Shriners can continue to raise money for Shriners Hospital. Please allow them to continue to continue to use Sans Souci to support their charitable efforts and affirm the recommendation from the Planning Commission.


Sincerely,
Howard Wynia
[REDACTED]@aol.com

From: [George Manson](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Sans Souci's potential rezone hurts El Katif Shriners
Date: Friday, October 30, 2015 12:01:11 PM

I think it's a terrible idea for you to adopt the Comprehensive Plan goal for the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

It is important to remember that Sans Souci is an investment property that funds El Katif's operations.. El Katif is a major fundraiser for the Shriners Children's Hospital. Therefore Spokane must not do anything that could damage El Katif's ability to earn income from this property.

Thank you for reading my email. And please vote No on the Sans Souci amendment. Please affirm the recommendation from the Planning Commission.

Sincerely,
George Manson
hotmail.com

From: [Jerry Combs](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Friday, October 30, 2015 12:18:58 PM

I'm writing today because I'm not sure why Spokane city officials would vote to restrict the amount of money the Shriners can raise for the Shriners Hospital.

No organization has done more to help our city's low-income families than El Katif. It's not right for the city to pass laws that would hurt their ability to sell or develop property they own for the highest, best purpose.

Please don't support this zoning change. It's not right for the Shriners and it doesn't help low-income families who need charity most. Please send a positive message and affirm the recommendation from the Planning Commission.


Sincerely,
Jerry Combs
[REDACTED]q.com

From: [David Campanella](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Oppose Sans Souci plan
Date: Friday, October 30, 2015 12:24:44 PM

I'm writing today because I believe would be a mistake to adopt the proposed Comprehensive Plan goal applicable to the Sans Souci Mobile Home Park.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major fundraiser for to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

This is important to me and to our community, so please support the Planning Commission's decision. Please do the right thing and reject this amendment.

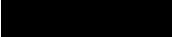
Sincerely,
David Campanella
msn.com

From: [Tom Richardson](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Shriners" main source of revenue is under attack
Date: Friday, October 30, 2015 12:29:54 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park could have devastating consequences for the El Katif Shriners and the fundraising it does for Shriners Hospital.

The biggest source of income for the El Katif Shriners is the Sans Souci Mobile Home Park. Spokane officials should be careful about rewriting the rules about what the Shriners can do with the property they own.

Thank you for considering my concerns. I hope you will agree that we need to do all we can do to support the Shriners. The Planning Commission understood El Katif's concerns, and we ask that the City Council does the same.


Sincerely,
Tom Richardson
gmail.com

From: [Roger Nelson](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Vote No! on Sans Souci West comprehensive plan goal
Date: Friday, October 30, 2015 12:53:30 PM

I'm writing to you today because I think the city is wrong to even consider a potential rezone of the Sans Souci Mobile Home Park.

The city should not limit El Katif's ability to appropriately manage Sans Souci for the best interest of the organization and the fundraising for Spokane Shriners Children's Hospital.

I appreciate your time and your service. The Planning Commission's recommendation was correct, please do the right thing and drop this amendment.

Sincerely,
Roger Nelson
kxly.com

From: [Thomas Redeye](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Hands off Shriners" private property
Date: Friday, October 30, 2015 2:00:34 PM

I can't believe that you are going to force the Sans Souci Mobile Home Park to remain nothing more than low-income housing forever. That's a dumb idea.

Under this Comprehensive Plan goal, El Katif would never be able to add apartments or condominiums to the property or change the housing mix in any way to increase revenue.

Thank you for allowing me to weigh in as part of the democratic process. Please do the right thing and make sure the El Katif Shriners can continue to raise money for Shriners Hospital. Please allow them to continue to continue to use Sans Souci to support their charitable efforts and affirm the recommendation from the Planning Commission.

Sincerely,
Thomas Redeye
[REDACTED]@gmail.com

From: [Snady Cook](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Comprehensive Plan Goal Targeted at Sans Souci hurts Shriners
Date: Friday, October 30, 2015 2:14:12 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park could have devastating consequences for the El Katif Shriners and the fundraising it does for Shriners Hospital.

If this Comprehensive Plan goal is approved, El Katif will never be able to change the housing mix or do anything to make more money off this land. This is important because these are the dollars the fraternity uses to fundraise for donations to Shriners Hospital.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter. Please show your support for these families affirm the recommendation from the Planning Commission.

Sincerely,
Snady Cook


theofficenet.com

From: [Stacy Flynn](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Support El Katif Shriners
Date: Friday, October 30, 2015 3:16:32 PM

I think it's a terrible idea for you to adopt the Comprehensive Plan goal for the Sans Souci Mobile Home Park and restrict what the Shriners can do with their own land.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Thank you for reading and for doing everything you can to support the El Katif Shriners. Please affirm the recommendation from the Planning Commission.


Sincerely,
Stacy Flynn
live.com

From: [William T. Henry](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Our Shriners Need Your Support
Date: Friday, October 30, 2015 4:14:46 PM

I'm writing to you today because I think the city is wrong to even consider a potential rezone of the Sans Souci Mobile Home Park.

Sans Souci Mobile Home Park income supports the operations of El Katif. The city should be very careful about rewriting the rules governing what the Shriners can or cannot do as property owners and as valuable members of our community.

Thank you for reading my email. The Shriners do important work in our community. Please allow them to continue to do this work and adopt the recommendation from the Planning Commission.


Sincerely,
William T. Henry
msn.com

From: [Jon Lind](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Friday, October 30, 2015 3:22:04 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park is a shortsighted plan with potentially devastating long-term consequences.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter. Please show your support for these families affirm the recommendation from the Planning Commission.

Sincerely,
Jon Lind
centurytel.net

October 30, 2015

**VIA U.S. MAIL AND E-MAIL: citycouncil@spokanecity.org
and ngwinn@spokanecity.org**

City of Spokane City Council
808 West Spokane Falls Boulevard
Spokane, Washington 99201

RE: Z1400065COMP
***Manufactured Housing Text Amendment to City of
Spokane Comprehensive Plan***

Dear Council President and Members of the City Council:

We are counsel to Shrine Park Association, Inc., ("Shrine Park"), the owner of Sans Souci West Mobile Home Park ("Sans Souci"). Shrine Park is a Fraternal Business Society organized under Chapter 24.24 RCW that supports the El Katif Shrine.

Shrine Park opposes the adoption of the proposed comprehensive plan text amendment that declares the City of Spokane's policy (the "Policy") to designate and protect manufactured and mobile home parks in perpetuity. It believes the Policy (i) was prepared without the required housing study, thus in violation of the City of Spokane Comprehensive Plan, (ii) is not consistent with the Growth Management Act, and (iii) violates Shrine Park's constitutional rights.

A. SANS SOUCI PROPERTY HISTORY AND USE.

Sans Souci is situated in the West Central neighborhood at the western terminus of Boone Avenue along the banks of the Spokane River where the former Natatorium Park was situated. It is comprised of 212 slips for single-wide and double-wide manufactured homes for lease to homeowners over fifty-five (55) years in age. Shrine Park acquired the property in 1967 to generate income to promote the activities of El Katif Shrine and its related clubs, which in turn is used to support the Shriner's Hospital for Children.

Many of the existing homes pre-date the adoption of the federal Manufactured Home Construction and Safety Standards Act in 1976 and are thus considered "mobile homes." These mobile homes have neared or are nearing the end of their utility and the owners have elected to

replace the units with new, more energy efficient and safe models. To continue to make Sans Souci attractive to prospective residents, Shrine Park has made a number of improvements to the infrastructure of the Sans Souci for the benefit of residents including work on the streets, club house and tenant safety facilities.

In 2009 and 2010, Shrine Park assisted in the preparation of the revisions to the City's Shoreline Master Program update which resulted in flexibility for the continued use of Sans Souci. In addition, it worked with the Washington State Department of Ecology to enhance the existing shoreline by planting various native plants. It views its partnership with local regulatory agencies as important for the long term sustainability of Sans Souci.

B. THE POLICY PROCESS TO DATE AND THE PLANNING COMMISSION RECOMMENDATION.

Shrine Park actively participated in the review and consideration of the Policy. It attended a number of workshops conducted by the City. It also attended both stakeholder group meetings to voice its opposition to the Policy and collaborate on potential alternatives that would resolve the concerns that prompted the initiation of the Policy.

The Shrine supports the Plan Commission's Findings of Fact, Conclusions, and Recommendation approved on September 23, 2015 ("Findings"). The Findings detail a number of specific deficiencies with the Policy that should be remedied before it is considered:

The City Plan Commission questioned whether the proposal will achieve the desired mix of housing, whether it furthers affordable housing goals, and whether the policy is needed if other factors may be remedied....

Conclusions, ¶ C.

The proposal will be more appropriately and effectively addressed through a complete housing review of existing policies....The time needed for this review is outside the 2014/2015 comprehensive plan amendment cycle...

Conclusions, ¶ D.

... The Plan Commission believes there is not enough information to make a decision on the merits of the proposal at this time...

Conclusion, ¶ G. The Plan Commission specifically concluded that the Policy lacked any evidence to support its adoption. Its recommendation defers the consideration of the Policy until such time as the City prepares the housing study it is required to do by Housing Goal 3.5.

C. THE RECOMMENDATION OF THE PLAN COMMISSION SHOULD BE AFFIRMED.

1. The Policy Violates the City's Comprehensive Plan.

The criteria to amend the City's Comprehensive Plan requires be internal consistency with the Comprehensive Plan together with its "supporting documents." SMC 17G.020.030(E). The Policy is not consistent as it prematurely attempts to protect a housing type without consideration of the City's progress on achieving its housing goals. The City bears an affirmative obligation under H 3.5 to conduct an annual review of the compliance with the City's housing goals. Goal H 3.5 entitled "Housing Goal Monitoring," states:

Provide a report annually to the City Plan Commission that monitors progress toward achieving the housing goals and includes recommended policy change if positive direction toward achieving housing goals is not occurring.

City of Spokane Comprehensive Plan, Goal H 3.5. As noted by the Planning Commission, this study has not been accomplished. It is a prerequisite to the consideration of the Policy. In addition, the conclusion that the required housing study could be conducted *after* the adoption of the Policy imposes significant burdens upon the public and City staff as it may result in duplicative processes and could ultimately demonstrate that the City Council should not have adopted the Policy in the first place.

In addition, the *draft* ordinance that adopts the Policy provided to the City Council highlights the deficiencies in the evidence. The *draft* ordinance does not indicate whether the number of manufactured housing units identified within City limits was inadequate. It also does not indicate that whether maintaining the number of manufactured housing units within City limits protects the affordable housing needs of the City. In sum, these missing elements demonstrate that the Policy is not supported by the record information developed by the City.

2. The Policy is Inconsistent with the Growth Management Act.

The City's criteria for Comprehensive Plan amendments also require compliance with the "goals and purposes of the Growth Management Act." SMC 17G.020.030(C). One of the planning goals within the GMA is that cities must "encourage" affordable housing to all economic segments and "promote" a variety of residential densities. RCW 36.70A.020. Moreover, the GMA encourages local jurisdictions to promote the use of affordable housing through incentives. RCW 36.70A.540. These incentives include, but are not limited to, bonus densities, height and bulk bonuses, and fee waivers. RCW 36.70A.540(1)(a).

The Policy is counterintuitive to the suggestions of the GMA. In lieu of encouraging park owners such as Shrine Park to invest in their facilities, and thus better places for residents to live, the Policy encourages Shrine Park and others to maintain the *status quo*. It provides no incentives for Shrine Park to invest in expanding Sans Souci or attempting to provide additional affordable housing within the park boundaries because future development, and thus income potential, is restrained. These issues were undiscovered by the fact the Plan Commission's subcommittee specifically concluded that any future iterations of the Policy should include "innovations" like "current use taxation or utility assessment programs."

3. The Policy Potentially Violates the Constitutional Rights of Shrine Park.

The adoption of the Policy has the potential to abrogate Shrine Park's constitutional rights. One of the fundamental tenants of the GMA is that private property rights be protected. RCW 36.70A.020(4). The GMA also protects landowners from arbitrary and discriminatory actions. *Id.* The Policy and the potential development regulations that it authorizes, impair Shrine Park's vested property right to freely redevelop their property for alternative uses. The City's apparent reliance upon the precedence established by the Ninth Circuit to justify the adoption of the Policy is misplaced since that case was solely limited to a *facial* constitutional challenge to the regulations adopted by the City of Tumwater. *Laurel Park Community, LLC, v. City of Tumwater*, 698 F.3d 1180, 1183 (9th Cir. 2012). It did not address compliance with the Growth Management Act, and thus should not be relied upon for that purpose.

The Washington State Supreme Court has been more vigorous in its protection of manufactured and mobile home park owners when the statute or regulation attempts to transfer the future development rights of a park from the property owner to its tenants. For instance, in *Manufactured Housing Communities of Washington v. State*, the Washington State Supreme Court struck down the Mobile Home Parks Residents' Ownership Act, which granted park tenants a right of first refusal when a park owner elected to sell their property as violating the eminent domain provisions of the Washington constitution. *Manufactured Housing Communities of Washington v. State*, 142 Wn.2d 347, 352, 13 P.3d 183 (2000). The court noted that the transfer of the future development rights to the park tenants destroyed the fundamental property rights of the park owner. *Id.* at 369. The City's attempted restriction on development rights of park owners, including Sans Souci, is no different.

In sum, Shrine Park supports the recommendation of the Plan Commission and believes that the commission of the housing study required by the Comprehensive Plan is a necessary prerequisite to the consideration of the Policy by the City.

October 30, 2015
Page 5

Should you have any questions regarding the foregoing, please do not hesitate to contact me.

Very truly yours,

WITHERSPOON & KELLEY



Nathan G. Smith

NGS/kh


C: Sans Souci

From: [Ronald Rodgers](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Oppose Sans Souci plan
Date: Friday, October 30, 2015 4:37:39 PM

I'm worried that a plan to allow the City to rezone the Sans Souci Mobile Home Park will have unintended consequences for the El Katif Shriner's and their fundraising efforts for Spokane Shriners Children's Hospital. I believe it's just plain wrong for the city to adopt a Comprehensive Plan goal allowing a rezone of the Sans Souci Mobile Home Park and forever limit the amount of money the Shriners can get from the property.

Sans Souci Mobile Home Park has been owned and operated by El Katif for years. They've established an excellent living environment for park residents. But they should not be prohibited from selling or redeveloping the property if they think it is best.

Thank you for considering my concerns. I hope you will agree that we need to do all we can do to support the Shriners. The Planning Commission understood El Katif's concerns, and we ask that the City Council does the same.


Sincerely,
Ronald Rodgers
nwlink.com

From: [Dave Lockard](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Mobile Home Goal hurts Shriners
Date: Friday, October 30, 2015 6:36:05 PM

I seldom write to city officials but I am today because this is important: Please stop the proposed Comprehensive Plan goal for the Sans Souci Mobile Home Park.

City officials have missed the mark here. While it is important to have low and moderate income housing in Spokane, forcing land owners to maintain this designation forever is shortsighted and wrong.

I know that the families who benefit most from the Shriners' charity will thank you and I also thank you for your time and consideration on this important matter. Please show your support for these families affirm the recommendation from the Planning Commission.

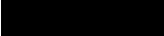
Sincerely,
Dave Lockard
q.com

From: [gerald.e.clayburn](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Our Shriners Need Your Support
Date: Friday, October 30, 2015 7:55:53 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park could have devastating consequences for the El Katif Shriners and the fundraising it does for Shriners Hospital.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major fundraiser for to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

I appreciate your time and your service. The Planning Commission's recommendation was correct, please do the right thing and drop this amendment.


Sincerely,
gerald e. clayburn
@juno.com

From: [gerald.e.clayburn](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Oppose Sans Souci plan
Date: Friday, October 30, 2015 7:56:03 PM

I want to make sure that the El Katif Shriners can continue to fundraise for Spokane Shriners Children's Hospital and the hospital continue to provide good care for local kids. That's why I want the Planning Commission to reject any plan that would cut into the income that the El Katif Shriners receive. I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

El Katif's charitable mission is to provide funding for the Shriners Children's Hospital in Spokane. In a nutshell, Sans Souci is investment property allowing El Katif to exist and to be a major fundraiser of the Shriner's hospital. Don't do anything to interfere with that.

Please don't support this zoning change. It's not right for the Shriners and it doesn't help low-income families who need charity most. Please send a positive message and affirm the recommendation from the Planning Commission.

Sincerely,
gerald.e.clayburn
juno.com

From: [gerald.e.clayburn](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't limit Shriners' good work
Date: Friday, October 30, 2015 7:56:46 PM

I'm worried that a plan to allow the City to rezone the Sans Souci Mobile Home Park will have unintended consequences for the El Katif Shriner's and their fundraising efforts for Spokane Shriners Children's Hospital. I believe it's just plain wrong for the city to adopt a Comprehensive Plan goal allowing a rezone of the Sans Souci Mobile Home Park and forever limit the amount of money the Shriners can get from the property.

This Comprehensive plan goal proposal that will go before the City Council explicitly limits the amount of income the Shriners can derive from this property long-term and that means the amount of money available for the fraternity to do fundraising for Shriners Hospital.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital. The Planning Commission's decision was right, please support their recommendation.

Sincerely,
gerald e. clayburn
[REDACTED]@juno.com

From: [Kurt Kimberling](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Vote No! on Sans Souci West comprehensive plan goal
Date: Saturday, October 31, 2015 7:35:49 AM

I'm writing to tell the city that it's a foolish idea to tell the Shriners they can't make as much as they can from their property, the Sans Souci Mobile Home Park.

Taking care of children at Shriners Hospital is expensive and costs continue to rise. We must not do anything to limit El Katif's ability to fundraise for the hospital.

Thank you for your time. Please stand up for the Shriners and help them to continue to support our children's hospital. The Planning Commission's decision was right, please support their recommendation.

Sincerely,
Kurt Kimberling
[REDACTED]@gmail.com

From: [Mike OBrien](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Protect El Katif investment potential
Date: Saturday, October 31, 2015 9:42:59 AM

I want to make sure that the El Katif Shriners can continue to fundraise for Spokane Shriners Children's Hospital and the hospital continue to provide good care for local kids. That's why I want the Planning Commission to reject any plan that would cut into the income that the El Katif Shriners receive. I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Please support the El Katif Shriners and the good works they do. Thank you for your time. We ask that you adopt the recommendation of the Planning Commission.


Sincerely,
Mike OBrien
[REDACTED]@gmail.com

From: [Steve Blagck](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Oppose Sans Souci plan
Date: Saturday, October 31, 2015 9:47:32 PM

I want to make sure that the El Katif Shriners can continue to fundraise for Spokane Shriners Children's Hospital and the hospital continue to provide good care for local kids. That's why I want the Planning Commission to reject any plan that would cut into the income that the El Katif Shriners receive. I heard that the city wants to put some kind of permanent income cap on the Shriners' property. I'm writing because I think that's a bad idea.

Sans Souci Mobile Home Park has been owned and operated by El Katif for years. They've established an excellent living environment for park residents. But they should not be prohibited from selling or redeveloping the property if they think it is best.

Thank you for allowing me to speak out on this important issue. Please support the Shriners and reject this amendment. The Planning Commission made the right decision, please affirm it!

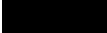
Sincerely,
Steve Blagck
yahoo.com

From: [Scott Hamilton](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Sans Souci's potential rezone hurts El Katif Shriners, the Shriner's Hospital, and the current residents. No upgrades creates slums!
Date: Monday, November 02, 2015 9:19:48 AM

I want the city council to reject any plan that would restrict changes and improvements of property use, effectively take property values without proper condemnation, and potentially take income from the El Katif Shriners and redirect for public works without proper authority.

Instead of considering proposals that would restrict what El Katif can do with its own private property, the city ought to be doing whatever it can to support the Shriners. Spokane is incredibly fortunate to have the El Katif Shriners here. They have a long track record of supporting the Shriner's Children's hospital. I want to see the city support El Katif, and the fundraising efforts for the Shriners Children's Hospital. I do not expect my city to do anything that would limit their ability to raise money and do good works long term.

I know you receive a lot of email from members of the public. Thank you for reading mine and considering my concerns about how this Comprehensive Plan amendment will affect the El Katif Shriners. The adoption of the Planning Commission's decision is important to me, so I ask that you affirm their decision.

Sincerely,
Scott Hamilton
raiinc.com

From: [John Robertson](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Oppose Sans Souci plan
Date: Monday, November 02, 2015 1:22:44 PM

Spokane's Shriners ability to support Shriner's Hospital will suffer if a proposed Comprehensive Plan goal is adopted permitting a rezone of the Sans Souci Mobile Home Park.

This proposal by the Spokane City Council directly threatens future income derived from Sans Souci threatening the existence of El Katif itself and, as a consequence, future funding for the Shriners Children's Hospital.

I know you receive a lot of email from members of the public. Thank you for reading mine and considering my concerns about how this Comprehensive Plan amendment will affect the El Katif Shriners. The adoption of the Planning Commission's decision is important to me, so I ask that you affirm their decision.

Sincerely,
John Robertson
[REDACTED]@gmail.com

November 2, 2015

City Council President Ben Stuckart
Members of Spokane City Council
808 West Spokane Falls Boulevard
Spokane, Washington 99201

***Re: Proposed Ordinance for Comprehensive Plan Text Amendment ("CPA")
Z-140065COMP***

Dear Council President and Members of the City Council:

This letter is submitted on behalf of Cascade Manufactured Home Community, located at 2311 W. 16th Avenue, between US-195 and Inland Empire Way. The Community contains 283 homes with a Clubhouse, Fitness Center, Heated Pool (plus Hot Tub and Sauna), Business Center, Free Wi-Fi and other amenities. It was constructed in 1970 and is age restricted to persons who are over 55 years old. Demographically, there is a wide range of lifestyles and incomes.

Cascade supports the Plan Commission's recommendation to deny the proposed Comprehensive Plan Text Amendment.

1. Consistent Amendments. SMC 17G.020.030(K) provides that Comprehensive Plan policy amendments, such as this one, should "provide correction or additional guidance" to better achieve "the community's original visions and values." In general, such "corrections" or "additional guidance" should be supported by findings from "feedback instruments related to monitoring and evaluating the implementation of the comprehensive plan". Id. Here, the City has wholly failed to provide relevant, local, documentation to support this proposal.

The proposed text amendment and ordinance is not consistent with nor has it addressed the Comprehensive Plan Housing Policy H-3.5. H-3.5 requires an annual housing report be provided to the City Plan Commission that "monitors progress towards achieving the housing goals and **includes recommended policy change** if positive direction towards achieving the housing goals is not occurring." (Emphasis added). This Comprehensive Plan policy assumes this CPA will be supported by "datasets" that are specific to the proposed action. Despite the clear recommendation from the Plan Commission, the proposed ordinance fails to show if affordable housing goals are not being achieved.

2. "Just a Policy." Staff has consistently clung to the mantra that this CPA is just a policy. At page 5 of the Proposed Ordinance, City Council is asked to adopt a recital that states

After this amendment to the Comprehensive Plan is enacted by the City Council, it is anticipated that the City will conduct a public process to determine what implementation strategy to pursue, and whether or not that strategy will involve any change to local development regulations.

WAC 165-96-500 states "development regulations must be internally consistent with and implement the comprehensive plan." *Id.* See also RCW 36.70.040(4) (GMA) which repeats the above requirement. The CPA puts the cart before the horse. In other words, when a comprehensive plan policy is adopted, the Growth Management Act assumes it will be followed by implementing development regulations.¹ If this is not the case, then the proper first step is to follow the recommendation of the Plan Commission and initiate the housing study.

The GMA anticipates that a Comprehensive Plan policy leads to adoption of development regulations. The only question is when those regulations should be adopted. But surely before a policy is passed, there should be a sound factual basis instead of a promise that there will be a "public process to determine what implementation strategy to pursue, and whether or not that strategy will involve any change to local development regulations."

3. Previous Public Participation. On May 15, 2015, Cascade submitted to the City of Spokane initial comments on the CPA. One section was devoted to the City Council's opportunities to promote affordable housing. Listed were a number of Washington statutes that allowed the City to enact affordable housing incentives. Also referenced was a report the City received entitled "Addressing Spokane's Affordable Housing Crisis: Policy Options for the City Council of Spokane." The above initiatives and report were not addressed by City Staff.

4. Conclusion. The Plan Commission formed a subcommittee to make specific inquiries concerning this proposed legislation. Meetings were held, information was gathered, and the

¹ It should also be noted that the Staff Report accompanying this Comprehensive Plan Amendment is inaccurate. SMC 17.G.020.030(e) entitled "Internal Consistency" is summarized by Staff with the following statement.

As appropriate, changes to the map or text of the Comprehensive Plan must result in corresponding adjustments to the zoning map and implementation regulations in the Spokane Municipal Code.

Id. The Staff response to this consistency requirement is the following.

The proposal does not result in the need for other amendments to the Comprehensive Plan or development regulations.

November 2, 2015

Page 3

public was given an opportunity to present facts and opinions. After careful deliberation, the Plan Commission recommended denial of this text amendment, but requested a 2016 work plan based upon the existing Comprehensive Plan Policy H-3.5.

For the reasons set forth above, and the clear need for the City to study this matter prior to enacting the proposed Comprehensive Plan Amendment, Cascade requests that the City Council follow the recommendation of the Plan Commission.²

Very truly yours,

WITHERSPOON • KELLEY



Stanley M. Schwartz

SMS/kh

cc: Gary Griglak

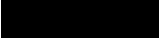
² Cascade also adopts the October 30, 2015 letter submitted to the City Council on behalf of the Shrine Park Association, Inc.

From: [Edward Rutledge](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Don't allow for a potential rezone of Sans Souci West
Date: Monday, November 02, 2015 8:12:48 PM

The proposed Comprehensive Plan amendment allowing the City to rezone the Sans Souci Mobile Home Park could have devastating consequences for the El Katif Shriners and the fundraising it does for Shriners Hospital.

The way I understand it, Sans Souci is an investment property allowing El Katif to exist. El Katif is a major fundraiser for to the Shriners Children's Hospital. What doesn't the city understand about this arrangement? The city must not do anything to interfere with El Katif's ability to earn income from this property.

Thank you for reading my email. And please vote No on the Sans Souci amendment. Please affirm the recommendation from the Planning Commission.

Sincerely,
Edward Rutledge
q.com

From: [Barry K Jones](#)
To: [Gwinn, Nathan](#); [City Council Members](#)
Subject: Vote No! on Sans Souci West comprehensive plan goal
Date: Friday, November 06, 2015 12:41:58 PM

I'm writing today because I believe would be a mistake to adopt the proposed Comprehensive Plan goal applicable to the Sans Souci Mobile Home Park.

A proposed Comprehensive Plan Amendment to allow for the City to rezone the Sans Souci as designated mobile and manufactured home parks is well-meaning, but it will severely restrict future income potential from the property. Why would the city want to interfere with the way El Katif has managed this property to support the fraternity. Please know that the majority of El Katif's income comes from the Sans Souci Mobile Home Park and all their fundraising benefits the local Children's Hospital. Please do not do anything that would threaten El Katif's ability to raise income over the long-term.

Thank you for allowing me to weigh in as part of the democratic process. Please do the right thing and make sure the El Katif Shriners can continue to raise money for Shriners Hospital. Please allow them to continue to continue to use Sans Souci to support their charitable efforts and affirm the recommendation from the Planning Commission.

Sincerely,
Barry K Jones
[REDACTED]@gmail.com