

21400065 COMP

City of
Spokane



Planning Services
Department

General Application

DESCRIPTION OF PROPOSAL:

Comprehensive Plan text amendment to create a new
Comp. Plan land use designation and new zoning designation
for Mobile Home Parks.

ADDRESS OF SITE OF PROPOSAL: (if not assigned yet, obtain address from Public Works before submitting application)

APPLICANT:

Name: Jon Snyder

Address: 808 W. Spokane Falls Blvd.

Phone (home): 509-217-2855

Phone (work): 509-625-6254

Email address: jsnyder@spokane-city.org

PROPERTY OWNER:

Name:

Address:

Phone (home):

Phone (work):

Email address:

AGENT:

Name:

Address:

Phone (home):

Phone (work):

Email address:

ASSESSOR'S PARCEL NUMBERS:

LEGAL DESCRIPTION OF SITE:

SIZE OF PROPERTY:

LIST SPECIFIC PERMITS REQUESTED IN THIS APPLICATION:



DESCRIPTION OF THE PROPOSED AMENDMENT Please check the appropriate box(es):

(Inconsistent Amendments will only be processed every other year beginning in 2005.)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Comprehensive Plan Text Change | <input checked="" type="checkbox"/> Land Use Designation Change |
| <input type="checkbox"/> Regulatory Code Text Change | <input type="checkbox"/> Area-wide Rezone |

Please respond to these questions on a separate piece of paper. Incomplete answers may jeopardize your application's chances of being reviewed during this amendment cycle.

1. General Questions (for all proposals):

- a. Describe the nature of the proposed amendment and explain why the change is necessary.
- b. How will the proposed change provide a substantial benefit to the public?
- c. Is this application consistent or inconsistent with the Comprehensive Plan goals, objectives and policies? Describe and attach a copy of any study, report or data, which has been developed that supports the proposed change and any relevant conclusions. If inconsistent please discuss how the analysis demonstrates that changed conditions have occurred which will necessitate a shift in goals and policies.
- d. Is this application consistent or inconsistent with the goals and policies of state and federal legislation, such as the Growth Management Act (GMA) or environmental regulations? If inconsistent, describe the changed community needs or priorities that justify such an amendment and provide supporting documents, reports or studies.
- e. Is this application consistent with the Countywide Planning Policies (CWPP), the comprehensive plans of neighboring jurisdictions, applicable capital facilities or special district plans, the Regional Transportation Improvement District, and official population growth forecasts? If inconsistent please describe the changed regional needs or priorities that justify such an amendment and provide supporting documents, reports or studies.
- f. Are there any infrastructure implications that will require financial commitments reflected in the Six-Year Capital Improvement Plan?
- g. Will this proposal require an amendment to any supporting documents, such as development regulations, Capital Facilities Program, Shoreline Master Program, Downtown Plan, critical areas regulations, any neighborhood planning documents adopted after 2001, or the Parks Plan? If yes, please describe and reference the specific portion of the affected plan, policy or regulation.
- h. If this proposal is to modify an Urban Growth Area (UGA) boundary, please provide a density and population growth trend analysis. Changes to the Urban Growth Area may occur only every five years and when the Board of County Commissioners (BoCC) reviews all UGA's countywide.

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2. For Text Amendments:

- a. Please provide a detailed description and explanation of the proposed text amendment. Show proposed edits in "line in/line out" format, with text to be added indicated by underlining, and text to be deleted indicated with ~~strikeouts~~.
- b. Reference the name of the document as well as the title, chapter and number of the specific goal, policy or regulation proposed to be amended/added.

3. For Map Change Proposals:

- a. Attach a map of the proposed amendment site/area, showing all parcels and parcel numbers.
- b. What is the current land use designation?
- c. What is the requested land use designation?
- d. Describe the land uses surrounding the proposed amendment site (land use type, vacant/occupied, etc.)

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Comprehensive Plan or Land Use Code Amendment

Application Answers to Questions

1. General Questions (for all proposals)

a. Describe the nature of the proposed amendment and explain why the change is necessary.

The amendment would create a new Comprehensive Plan Land Use Designation as well as a new zoning designation for existing Manufactured Home Parks.

This change is necessary to protect residents of Manufactured and/or Mobile Home Parks from potential relocation as a result of land owner sales. According to the Seattle Times, from 2003 to 2007 Mobile Home Park closures in the State of Washington were 13.6 per year.¹ From 2008 to 2013, at least 3 Mobile Home Parks Closed in Spokane County according to the Department of Commerce.

The hardship of moving from a Mobile or Manufactured Home Park is difficult for the residents and members to bear. The state legislature recognized this back in 1990 when they adopted HB 2907 (Mobile Home Relocation Bill). While the state still offers relocation assistance, it can still be a lengthy and costly process even with help.² This would add an extra layer of scrutiny to land sales or redevelopment efforts that could displace Manufactured and/or Mobile Home Park residents.

b. How will the proposed change provide a substantial benefit to the public?

It will be a benefit due to the fact that Manufactured and/or Mobile Homes provide residents of the City of Spokane with another option for lower income, higher density housing. The latest available data suggests that around 32% of households in Spokane have a median income of less than \$25,000 (American Community Survey 2013, 1-Year Estimate, City of Spokane, Household Income Less Than \$25,000). The Median Value for an Owner-Occupied House in Spokane is estimated to be \$155,300 (American Community Survey 2013, 1-Year Estimate, City of Spokane, Owner-Occupied Housing Units: Median Value). This is unaffordable for many people who live in the city. In contrast, the Census Bureau estimates that the average sales price for a new Manufactured Home in the Western U.S. is \$44,600 for a new single-wide and \$86,600

¹http://seattletimes.com/html/snohomishcountynews/2004320063_mobileparks02n.html

² In April 2013, the Department of Commerce issued a memorandum that noted, "We are unable to estimate how long the reimbursement process will take due to the fluctuation of the revenue source." (See attached).

for a new double-wide.³ The Consumer Financial Protection Bureau estimates that monthly housing costs for Metro Manufactured Homes are \$816 less per month for owner-occupants and \$316 less per month for renters.⁴

Manufactured homes also provide a community benefit in terms of efficient energy use and environmental impact; an important goal of the Comprehensive Plan (NE 18 – Energy Conservation). According to a 2012 study titled *“Sustainability in Manufactured Home Communities: Cost-Effective Energy, Water and Community Infrastructure Strategies to Maximize Long-Term Value,”* Manufactured Homes have an overall environmental impact that is less than half that of a Single-Family Home.⁵

- c. Is this application consistent or inconsistent with the Comprehensive Plan goals, objectives and policies? Describe and attach a copy of any study, report or data, which has been developed, that supports the proposed change and any relevant conclusions. If inconsistent please discuss how the analysis demonstrated that changed conditions have occurred which will necessitate a shift in goals and policies.**

The proposed change is consistent with the Comprehensive Plan in numerous ways. One of the key objectives under the Comprehensive Plan is to provide a diversity of housing options as it relates to neighborhood/location, housing price, type and form. For instance, it is stated under Policy LU 3.11 (Compact Residential Patterns) that the city should, *“Allow more compact and affordable housing in all neighborhoods in accordance with neighborhood-based design guidelines.”* Another example is Policy H 2.1 (Distribution of Housing Options), which states, *“Promote a wide range of housing types and housing diversity to meet the needs of the diverse population and ensure that this housing is available throughout the community for people of all income levels and special needs.”*

A similar sentiment is espoused in Policy DP 6.2 (Access to Housing Choices), Policy SH 4.1 (Socioeconomic Mix) and Policy N 2.6 (Housing Options). Preservation of current Manufactured and/or Mobile Home Parks, via a new land use designation and a new zoning designation, is consistent with these policies in a few ways:

³ Census Bureau, Average Sales Price of New Manufactured Homes by Region and Size of Home, 2013. (See attached)

⁴ Consumer Financial Protection Bureau (2014), *Manufactured-housing consumer finance in the United States*, pg. 22. (See: http://files.consumerfinance.gov/f/201409_cfpb_report_manufactured-housing.pdf)

⁵ To Measure environmental impact, they looked at energy use, water use, storm water impacts, construction waste, greenhouse gas emissions and affordability. (See: <http://rocusa.org/uploads/Sustainability%20in%20Manufactured%20Home%20Communities%20-%20White%20Paper.pdf>).

- Manufactured and/or Mobile Home Parks offer a higher density alternative to apartments or single family homes, thus giving potential home buyers or renters another housing option beyond traditional apartments, lofts or condos.
 - Example: Contempo Mobile Home Park, contained in Block 3006, has a population density of 5,753 people per sq. mile. Blocks just to the East have less density. (See attached)
- Current Manufactured and/or Mobile Home Parks can be found throughout the City of Spokane in neighborhoods such as Latah Valley, Grandview Thorpe, West Central and Hillyard; giving buyers and renters a breadth of potential locations to live within the City of Spokane.
- Manufactured and/or Mobile Homes are traditionally less expensive than single family homes, and can accommodate families as well as seniors.
 - As noted above, monthly costs for manufactured homes are significantly less than site-built homes.
 - An Example of a community that a Manufactured Home Community that caters specifically to populations at risk for being low income is Cascade Manufactured Home Community is an age 55+ community that includes a pool, clubhouse, fitness center, picnic area, etc. that is in close proximity to downtown.

d. Is this application consistent or inconsistent with the goals and policies of state and federal legislation, such as the Growth Management Act (GMA) or environmental regulations? If inconsistent, describe the changed community deeds or priorities that justify such an amendment and provide supporting documents, reports or studies.

Two of the primary goals of the Growth Management are to *“Reduce sprawl”* and *“Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential density and housing types, and encourage perseveration of existing housing stock”* (RCW 36.70A.020 (2) & (4)).

The creation of a new land use designation and new zoning designation for Manufactured and/or Mobile Home Parks would accomplish both of these goals by:

- Protecting existing higher density housing. Higher housing densities create more compact communities that slow the outward expansion of the city’s boundaries.
- Protecting affordable housing options that exist in Manufactured and/or Mobile Home Parks.

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- e. **Is this application consistent with the Countywide Planning Policies (CWPP), the comprehensive plans of neighboring jurisdictions, applicable capital facilities or special district plans, the Regional Transportation Improvement District, and official population growth forecasts? If inconsistent please describe the changed regional needs or priorities that justify such an amendment and provide supporting documents, reports or studies.**

As with the Growth Management Act, one the topics addressed in the Countywide Planning Policies for Spokane County is affordable housing (Policy Topic 7). It states, *"Each jurisdiction's comprehensive plan shall specify the strategies for attaining its affordable housing objectives. These strategies should include a diverse mix of housing types and prices, including low-income housing" (pg. 36)*. This amendment to the Comprehensive Plan is a way to preserve current low income housing stock in Manufactured and/or Mobile Home Parks.

- f. **Are there any infrastructure implications that will require financial commitments reflected in the Six-Year Capital Improvement Plan?**

Due to the fact that this would only impact current Manufactured and/or Mobile Home Parks who are already being serviced, there are no additional financial commitments required at this moment in time.

- g. **Will the proposal require an amendment to any supporting documents, such as development regulations, Capital Facilities Programs, Shoreline Master Program, Downtown Plan, critical areas regulations, any neighborhood planning documents adopted after 2001, or the Parks Plan. If yes, please describe and reference the specific portion of the affected plan, policy or regulation.**

This proposal will not require a change to the Capital Facilities Program, Shoreline Master Program, Downtown Plan, critical area regulations, the Parks Plan or any known neighborhood plans.

- h. **If this proposal is to modify an Urban Growth Area (UGA) boundary, please provide a density and population growth trend analysis. Changes to the Urban Growth Boundary may occur only every five years and when the Board of County Commissioners (BoCC) reviews all UGA's countywide.**

This proposal does not modify an Urban Growth Area (UGA) boundary.

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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 house-holds which cannot afford to purchase other types of housing. When existing manufactured home parks are redeveloped many homeowners are unable to move to 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.

- b. Reference the name of the document as well as the title, chapter and number of the specific goal, policy or regulation to be proposed/amended.

City of Spokane Comprehensive Plan, Chapter 3 (Land Use), LU 1.X Mobile Home Parks.

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