

**SPOKANE CITY PLAN COMMISSION FINDINGS OF FACT, CONCLUSIONS, AND  
RECOMMENDATION ON THE PROPOSED COMPREHENSIVE PLAN TEXT  
AMENDMENT FOR MOBILE AND MANUFACTURED HOME PARK PRESERVATION  
FILE NO. Z1400065COMP**

**A recommendation from the City Plan Commission to the City Council to deny proposed Comprehensive Plan Amendments to add a new policy, LU 1.X Mobile Home Parks, to the text of Chapter 3, Land Use.**

**FINDINGS OF FACT:**

- A.** The Washington State Legislature passed the Growth Management Act (GMA) in 1990, requiring among other things, the development of a Comprehensive Plan (RCW 36.70A).
- B.** The City of Spokane adopted a Comprehensive Plan in May of 2001 that complies with the requirements of the Growth Management Act.
- C.** Spokane Municipal Code (SMC), Title 17G, Administration and Procedures, chapter 17G.020 Comprehensive Plan Amendment Procedure was used to prepare this proposed amendment to the Comprehensive Plan.
- D.** SMC chapter 17G.020 "Comprehensive Plan Amendment Procedure" identifies terms and conditions for Comprehensive Plan amendments.
- E.** City of Spokane Comprehensive Plan, Land Use Chapter, Goal LU 1, Citywide Land Use states: *Offer a harmonious blend of opportunities for living, working, recreation, education, shopping, and cultural activities by protecting natural amenities, providing coordinated, efficient, and cost effective public facilities and utility services, carefully managing both residential and non-residential development and design, and proactively reinforcing downtown Spokane's role as the urban center.*
- F.** City of Spokane Comprehensive Plan, Land Use Chapter, Goal LU 7, Implementation states: *Ensure that the goals and policies of the comprehensive plan are implemented.*
- G.** City of Spokane Comprehensive Plan, Land Use Chapter, Policy LU 7.1 Regulatory Structure states: *Develop a land use regulatory structure that utilizes creative mechanisms to promote development that provides a public benefit.*
- H.** City of Spokane Comprehensive Plan, Housing Chapter, Goal H 1, Affordable Housing states: *Provide sufficient housing for the current and future population that is appropriate, safe, and affordable for all income levels.*
- I.** City of Spokane Comprehensive Plan, Housing Chapter, Goal H 2, Housing Choice and Diversity states: *Increase the number of housing alternatives within all areas of the city to help meet the changing needs and preferences of a diverse population.*
- J.** City of Spokane Comprehensive Plan, Housing Chapter, Goal H 3, Housing Quality states: *Improve the overall quality of the City of Spokane's housing.*
- K.** City of Spokane Comprehensive Plan, Housing Chapter, Policy H 3.2 Property Responsibility and Maintenance states: *Assist in and promote improved and increased public and private property maintenance and property responsibility throughout the city.*
- L.** City of Spokane Comprehensive Plan, Housing Chapter, Policy H 3.3 Housing Preservation states: *Encourage preservation of viable housing.*

- M. City of Spokane Comprehensive Plan, Housing Chapter, Policy H 3.5 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 the housing goals is not occurring.*
- N. City of Spokane Comprehensive Plan, Urban Design and Historic Preservation Chapter, Goal DP 6 Neighborhood Qualities states: *Preserve, improve, and support the qualities of individual neighborhood areas.*
- O. City of Spokane Comprehensive Plan, Urban Design and Historic Preservation Chapter, Policy DP 6.2 Access to Housing Choices states: *Encourage building and site design that allows a variety of housing forms while being compatible with the character of the immediate surrounding area, thereby generating community support for development at planned densities.*
- P. City of Spokane Comprehensive Plan, Social Health Chapter, Policy SH 4.1 Socioeconomic Mix states: *Ensure that all neighborhoods contain a mixture of housing types in order to provide an environment that allows for socioeconomic diversity.*
- Q. City of Spokane Comprehensive Plan, Neighborhoods Chapter, Policy N 2.4 Neighborhood Improvement states: *Encourage rehabilitation and improvement programs to conserve and upgrade existing properties and buildings.*
- R. Staff requested comments on the Environmental Checklist from City Departments and outside agencies on January 22, 2015. The comment period ended on February 5, 2015. No comments were received from agencies or departments.
- S. Staff presented the proposal to the Community Assembly at its meeting on March 6, 2015.
- T. Notice of the proposed Comprehensive Plan Amendment application and State Environmental Policy Act (SEPA) review was sent to agencies, organizations and neighborhood councils on March 9, 2015. This initiated a 60-day public comment period. Notice was also published in the *The Spokesman Review* on March 9 and 16, 2015 and the *Official Gazette* of the City of Spokane on March 4 and 11, 2015. Comments were provided by interested parties.
- U. The Spokane City Plan Commission held workshops to study the proposed amendment on April 8, July 22 and August 26, 2015.
- V. A Public Open House was held on April 15, 2015, in the Chase Gallery in the Lower Level of City Hall, to receive public feedback and respond to questions about the proposal.
- W. Stakeholder group meetings regarding the text amendment were held on June 17 and July 9, 2015.
- X. A State Environmental Policy Act (SEPA) Determination of Non-Significance was issued on September 4, 2015 relating to this Comprehensive Plan Amendment.
- Y. Announcement of the Plan Commission's September 23, 2015 hearing was published in *The Spokesman Review* on September 9 and 16, 2015. Notice was also provided in the September 9, 2015 issue of the *Official Gazette*.
- Z. On September 14, 2015, the Washington State Department of Commerce and appropriate state agencies were given the required 60-day notice before adoption of proposed changes to the Spokane Comprehensive Plan. An acknowledgement letter from the Department of Commerce was received by the City on September 15, 2015.

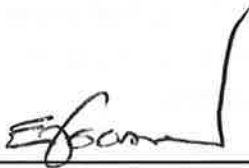
**AA.** The City Plan Commission held a Public Hearing on September 23, 2015 to obtain public comments on the proposed amendments; deliberations followed.

**CONCLUSIONS:**

- A.** The Plan Commission has reviewed all public testimony received during the public hearings.
- B.** The proposed amendments have been reviewed by the City Plan Commission, which believes there is not enough information available to determine the proposal's conformance with the goals and policies of the City's 2001 Comprehensive Plan.
- C.** 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.
- D.** The proposal will be more appropriately and effectively addressed through a complete housing review of existing policies, as recommended by the Plan Commission subcommittee that participated in the stakeholder meetings. The time needed for this review is outside the 2014/2015 comprehensive plan amendment cycle.
- E.** The City Plan Commission recognizes it has been some time since it has been briefed on the progress toward achieving the City's housing goals.
- F.** The City Plan Commission concurs with the subcommittee and believes the proposal may be more appropriately studied as part of the work program in the year 2016, outside the 2014/2015 comprehensive plan amendment cycle.
- G.** For the reasons outlined in the subcommittee's August 18, 2015 attached report, the Plan Commission believes there is not enough information to make a decision on the merits of the proposal at this time and that this proposal would be more appropriately addressed as another part of the Plan Commission's work program.

**RECOMMENDATION:**

By a vote of 5 to 1, the Plan Commission recommends to the City Council the denial of the proposed amendment to the Comprehensive Plan, and that a Plan Commission housing review program be put on the 2016 Plan Commission work program.



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**Evan Verduin, Vice President  
Spokane Plan Commission  
September 23, 2015**

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MEMORANDUM

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DATE: August 18, 2015

TO: City Plan Commission

FROM: Commissioners F.J. Dullanty, Jr., John Dietzman, and Gail Prosser

RE: Plan Commission Subcommittee Report  
for Proposed Comprehensive Plan Text Amendment  
File Z1400065COMP, Mobile and Manufactured Home Park  
Preservation

A subcommittee of the Plan Commission participated in discussions about manufactured home parks with a number of stakeholders that represented both park owners, industry consultants and tenants. The stakeholder group meetings were held June 17, 2015 and July 9, 2015 to provide information to the subcommittee and staff regarding issues surrounding manufactured home parks. This memorandum summarizes the Plan Commission subcommittee's consensus regarding suggested action by the Plan Commission on the proposed text amendment. It was the consensus of the subcommittee that the proposed Amendment Z1400065COMP should be sent to the City Council with a recommendation of denial for these summarized reasons, and for such other reasons the Plan Commission may adopt, if the Plan Commission cannot reach a recommendation of approval.

The subcommittee believes the application materials for the proposed text amendment offer insufficient evidence to support its adoption. The subcommittee feels that there is a lack of information on the relation of manufactured home parks to the promoting of increased densities in centers and corridors as well as affordable housing.

Plan Commission subcommittee members, however, developed an alternative to adopting the proposed Amendment. A Plan Commission workshop on the Mobile and Manufactured Home Park Preservation Amendment is scheduled for August 26, 2015. Following the workshop, staff will request a public hearing on this and the other proposed Comprehensive Plan amendments. The subcommittee asks that the Plan Commission consider the following alternative if the Commission cannot support the Amendment proposal. The Commission should then adopt the alternative into its Findings & Conclusions to be forwarded to the City Council.

### **PROPOSED ALTERNATIVE:**

**The Amendment should be denied and a Housing Review of progress toward all housing goals, including manufactured housing, should be conducted.**

The subcommittee believes that the proposed Comp Plan Text Amendment should be denied, and the Plan Commission should conduct a complete Housing Review of existing housing goals and policies, including but not limited to, mobile/manufactured homes and mobile/manufactured home parks. Input to this Review will include City Comprehensive Plan Policy H 3.5, "Housing Goal Monitoring," which outlines instructions for Staff to produce a Monitoring Report that will provide direction to the Plan Commission for recommended policy change if progress toward the City's housing goals is not achieved. The Staff's preliminary report of the status of mobile home parks provides a good start on this effort. This Housing Review would necessitate further study outside the timeframe of the 2015 Comprehensive Plan amendment cycle, so it should be included as part of the Plan Commission's 2016 Work Program.

A component of a complete Housing Review would include review of Development Standards for Mobile Home Parks (17-345.120) both as to site size and current issues in manufactured housing as it may relate to affordable housing, plus policy implementation measures to incentivize the maintenance of current manufactured home parks and the creation of new parks. The current 10 acre minimum parcel size required for a new manufactured home park may actually restrict park development in the City. Revising the SMC Section 17C.345.120 would possibly eliminate the need for new Comp Plan language.

For all types of housing citywide, part of the analysis should include housing needs and housing location plus local job generation related to housing. A complete review would also include citywide options to upgrade housing infrastructure and affordable housing of all types as well as innovations such as current use taxation or utility assessment programs.