MEMORANDUM

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.