

Report to Plan Commission 8-26-15: Manufactured Homes

Gail, Rick, and I don't believe there is a **compelling evidence** that there is a **need** for this proposed amendment. There are three main reasons.

1. First, although there **may be problems with manufactured housing park closures in some parts of the country**, we think **our history shows** that Spokane **does not have a significant problem**.
2. Second, we think that the **forced freezing of the manufactured housing park land use** in order to **inhibit an owner from closing a park** and redeveloping it with a **more profitable land use**, is a **bad way** to address the issue.
3. Third **we don't think** the proposed amendment will help us **meet the important Comp Plan goals of controlling sprawl**, promoting **increased housing densities around centers and corridors**, and promoting **increased affordable housing**.

The following was left out in the interest of time:

Concerning the need for the amendment, in the past three decades, the Amendment would have **inhibited the closure of only one park**. That was **15 years ago** and the park contained only about **6% of the total spaces in Spokane**. There are **two new parks since then** that have more than replaced that loss.

The proposed amendment will not do anything to increase housing density around centers, where employment, shopping, public transportation, and other services are more readily available.

It will not increase affordable housing. At best, the proposed amendment will lock in the affordable housing component of the existing parks, most of which are on the outer edge of the City. But the forced freezing of the existing parks land use will probably inhibit the construction any new parks. If any new parks are constructed, they will also likely to be on the outskirts of the City due to the 10 acre minimum size requirement.

We feel that Citywide, there are some **very complicated and interconnected housing issues**, and that we are probably **falling short of meeting** some of our Comp Plan **housing goals**. The **dialog** created by this proposed amendment concerning manufactured housing **has been beneficial** because it has **made it clear** that we need to take a **holistic look at all the issues** associated with housing,..... **housing of all types and all locations**.

We feel that the **best way to do this** is for the **Plan Commission** to conduct a **complete Housing Review of existing housing goals and policies** for all types of housing, **including manufactured housing**. **Input to this Review** will include a "**Housing Goal Monitoring Report**", which is called for in the Comp Plan, produced by the Staff 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 manufactured home parks provides a **good start on this effort**.

To sum up, we feel the **Plan Commission recommendation to the City Council** should be that the **proposed amendment be denied**, and that the **Plan Commission** should conduct a complete **Housing Review**. 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**.

ADDITIONAL NOTES IN CASE THERE WERE QUESTIONS:

There is a vacancy rate of about 15% in the existing parks.

Housing density averages less than 7 units per acre.

Manufactured housing does not promote as many local construction jobs as conventional housing. I looked at a number of companies marketing manufactured homes in Spokane. None of the 26 factories where they are built are in Spokane County. Only 3 were located elsewhere in Washington State.

Existing Manufactured home parks have contributed to sprawl. 30% of the existing parks are at the City limits and the average distance to the City limits of all the parks is less than a half mile.

As to the problem of delaying a Comp Plan text amendment until the 2017 cycle, 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.

A component of this Housing Review would include review of possible measures to incentivize the maintenance of current manufactured home parks and the creation of new parks, including consideration of a reduction in the minimum 10 acre size of new parks.

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.