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*An Organization of Manufactured Home Park Residents*

# ALL PARKS ALLIANCE FOR CHANGE (APAC) COMPREHENSIVE PLAN PROJECT

*Giving voice to Minnesota's manufactured housing communities*

Prepared by Owen Hawkins and Dave Anderson

July 2020



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We started this project with the intention of improving city comprehensive plans on behalf of manufactured housing residents.

The 2018 Update gave us an opportunity to push for change at a time characterized by a pressing need for innovative solutions to the affordable housing crisis.



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## Goals

- Increase language that identifies manufactured housing as a resource.
- Increase quantity of language discussing manufactured housing in comprehensive plans.
- Increase relevance and quality of language discussing manufactured housing.
- Increase discussion and awareness of manufactured housing among residents, city officials, and general public.



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### Goals (Continued)

- Investigate and promote comprehensive plans as a tool of positive system change.
- Reframe stigma regarding manufactured housing residents and communities.
- Serve as a platform for community organizing and facilitate residents' democratic engagement with their elected officials and city planners.



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## Questions

- What is the relationship between planning and outcomes for specific groups?
- What is the relationship between advocacy and planning?
- What role does government have in providing outcomes for specific resident groups?
- What incentive structures create barriers to establishing best practices?
- What values affect the processes and outcomes we are seeking to support?
- How do we best create a messaging strategy that resonates with stakeholders beyond the group we directly represent?



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### Project Timeline

- Started planning and research in January, 2016
- Engaged cities in letters and meetings through 2017 and 2018
- Obtained drafts at end of 2018
- Developed and applied evaluation criteria in 2019
- Compiled findings and report - 2020



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## Methodology

- Reviewed comprehensive plan language related to manufactured housing using key-word search (“manufactured,” “mobile,” and “trailer”)
- Compiled language in spreadsheet
- Provided review and feedback to cities based on their comprehensive plans
- Developed evaluation criteria
- Scored available comprehensive plan language according to evaluation criteria
- Compared original and draft scores



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## Tailored Letters (21 Cities):

October 2016 and May 2017

Arden Hills  
Bloomington  
Burnsville  
Fridley  
Inver Grove Heights  
Lakeville  
Maplewood  
Mounds View  
Plymouth  
St. Anthony

December 2017 and January 2018

Apple Valley  
Blaine  
Chaska  
Dayton  
Hastings  
Hilltop  
Lake Elmo  
Landfall  
Little Canada  
Shakopee  
New Brighton  
Vadnais Heights





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### **Components of Tailored Letters (21 Cities):**

- Cover Letter
- City Fair Market Rent (FMR) compared with average lot rent
- Total Lots
- Vacant Lots
- Vacant Homes
- 2014 population
- Strengths, Weaknesses, Opportunities, and Threats (SWOT Analysis)
- Guide to Manufactured Housing Best Practices



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# Guide to Manufactured Housing Best Practices (Appendix 1, pg. 5):

- Use manufactured housing to address affordability without new large-scale multifamily construction.
- Change ordinances to allow manufactured homes to be sited in residential districts outside existing parks.
- Improve each city's level of affordable housing by reducing loan barriers to move residents into currently available manufactured housing units.
- Generate funding opportunities for repair and maintenance, and set standards for infrastructure in manufactured housing parks.



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## Guide to Manufactured Housing Best Practices (Continued):

- Encourage resident purchase of communities through local tax incentives and “Right of First Refusal” purchase opportunities.
- Promote manufactured housing within comprehensive plans and other city outlets as a primary unsubsidized affordable homeownership option for low-income working residents.
- Actively reduce stigma against manufactured housing.



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### **In-Person Meetings (14 Cities):**

July 2017 to September 2017

Arden Hills  
Bloomington  
Fridley  
Inver Grove Heights  
Lakeville  
Maplewood  
Mounds View

March 2018 to September 2018

Hastings  
Hilltop  
Lake Elmo  
Landfall  
Little Canada  
Shakopee  
Vadnais Heights



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### **Form Letter Package sent March 2, 2018 (26 Cities)**

Belle Plain  
Coon Rapids  
Corcoran  
Cottage Grove  
East Bethel  
Forest Lake  
Grant  
Ham Lake  
Hugo  
Jordan  
Linwood Township  
Lino Lakes  
Norwood-Young America

Oakdale  
Ramsey  
Richfield  
Rockford  
Rosemount  
Roseville  
Shoreview  
South St. Paul  
Spring Lake Park  
St. Francis  
St. Paul Park  
Waconia  
Watertown



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### **Components of Form Letter Package (Appendix 2)**

- Cover Letter
- Guide to Manufactured Housing Best Practices
- Recommendations from APAC's Report to the Greater Minnesota Housing Fund
- Sample Positive Manufactured Housing Comprehensive Plan Language
- Sample Loan Language



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## **Draft Evaluations - September 2018 to December 2018 (28 Cities):**

Arden Hills  
Apple Valley  
Blaine  
Bloomington  
Burnsville  
Coon Rapids  
Corcoran  
Cottage Grove  
Forest Lake  
Fridley  
Hastings  
Hugo  
Inver Grove Heights  
Jordan

Lake Elmo  
Lexington  
Lino Lakes  
Maplewood  
New Brighton  
Oakdale  
Plymouth  
Ramsey  
Richfield  
Shakopee  
Shoreview  
Vadnais Heights  
Waconia  
Watertown



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### **Components of Draft Evaluation Letter (Appendix 3)**

- Review of City Comprehensive Plan language by evaluation categories
- Recommendations to improve the City's Comprehensive Plan language
- Overview of the benefits of manufactured housing





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### **Baseline Criteria: What is the City's stance towards manufactured housing?**

**+3** - Language in the comprehensive plan describes manufactured housing in a positive way.

**+2** - Language will be very similar to +3, with the difference being the city does not lay out actionable, concrete plans in the language to support manufactured home parks, but it discusses desires to protect manufactured housing, and is otherwise supportive.

**+1** - Language discusses manufactured housing in a positive way, however, the city does not discuss any plans or desires to protect manufactured home parks.

**0** - A city describes the existence of manufactured housing, but is indifferent. It is not described in either positive or negative light, nor is there specific zoning for manufactured home park.

**Invisible** - When a city has manufactured home parks within its limits, but the comprehensive plan language does not acknowledge it, we classify this language as invisible.



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### Baseline Criteria (Continued)

- 1 - Language describes manufactured home parks in a negative light, or goes out of its way to refer to them with outdated, stigmatized language (i.e. “trailer park”).
- 2 - Language describes manufactured housing in a negative light, indicating that the city would at some point be open to other parties redeveloping their manufactured home parks.
- 3 - Language contains the negative elements mentioned in the -1 and -2 categories, and in addition, has the city’s intent to concretely, actively, and directly lead efforts to redevelop manufactured home parks, as well as laying out a specific timeline to do so.



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# Additional Scoring Criteria

## What do we want to see?

### **Negative:**

- 1 (Negative language present)
- 0 (Negative Language not present)

### **Invisible:**

- 1 (No substantive discussion of manufactured housing)
- 0 (Substantive discussion of manufactured housing present)

### **Purely Descriptive:**

- 1 (Statistics/Basic Facts only)
- 0 (Discussion of manufactured housing beyond Statistics/Basic Facts)



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### **Additional Scoring Criteria (Continued)**

**Identifies manufactured housing as affordable housing:**

0 (Manufactured housing not described as affordable housing)

+1 (Manufactured housing described as affordable housing)

**Identifies clear strategies to support manufactured housing:**

0 (No support strategies described)

+1 (Support strategies described)

**Identifies funding sources to support manufactured housing:**

0 (No funding sources described)

+1 (Funding sources described)

**Connects improvement strategies to funding:**

0 (No strategies connected to funding sources described)

+1 (Strategies connected to funding sources described)



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## Comprehensive Plan Scores

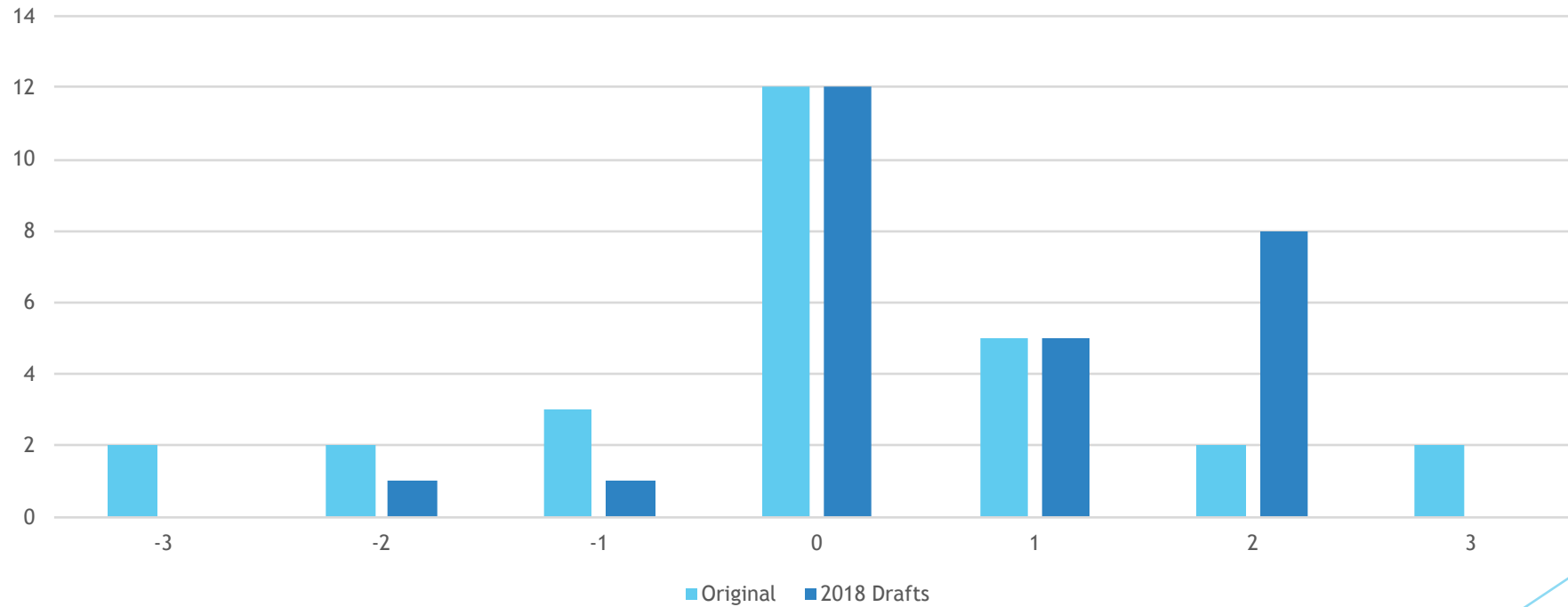
	Original Average	2018 Average	Change
All	-0.07	1.0	1.07
Tailored	1.0	1.25	.25
Meetings	0.2	1.5	1.3
Form	-0.53	0.6	1.13



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## Content Analysis - Baseline Criteria (28 Cities Submitting Drafts)

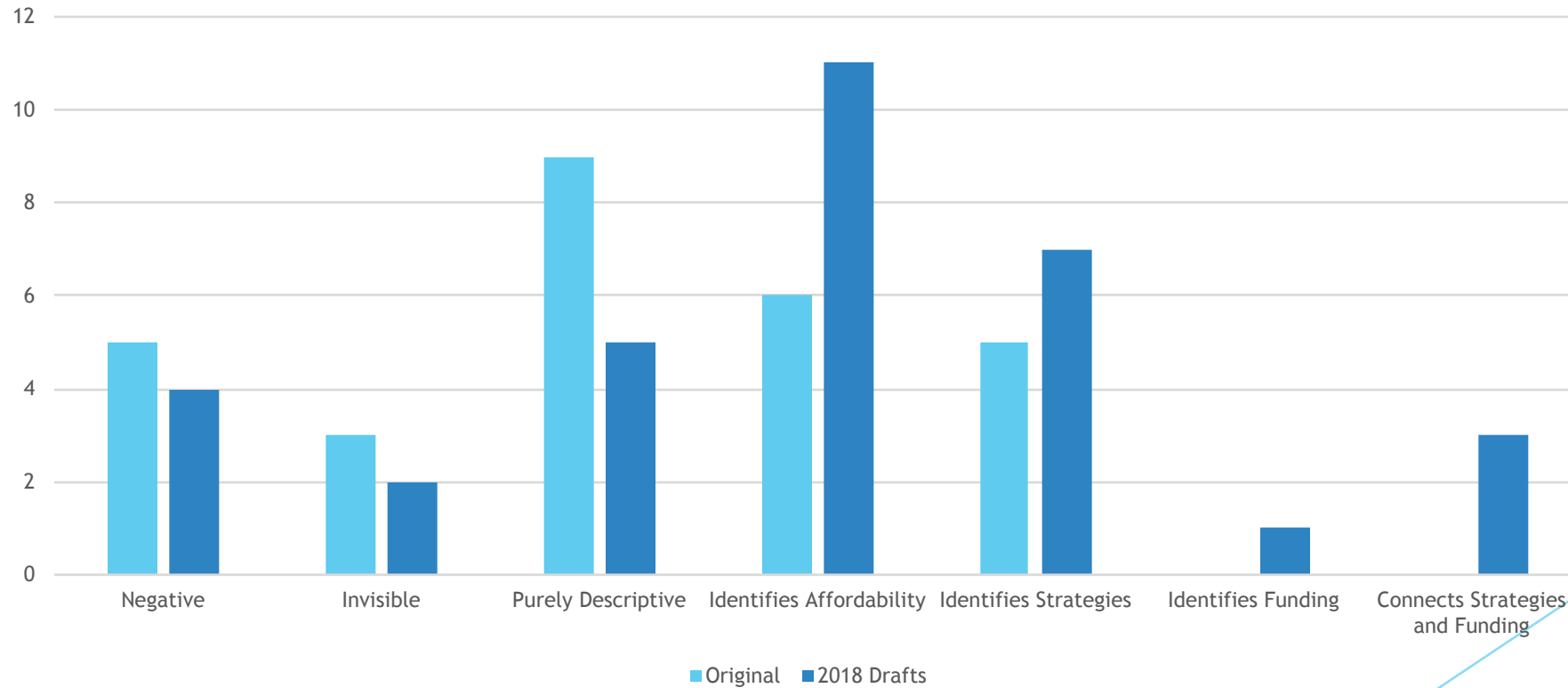




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## Content Analysis - Additional Criteria (28 Cities Submitting Drafts)





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## Highlights

### Many cities ...

- added language that clarified general support of manufactured housing
- improved on identifying manufactured housing as affordable
- added zoning or land use categories specifically for manufactured housing
- removed negative or stigmatizing language

### Most cities ...

- failed to describe robust and detailed plans for supporting manufactured housing
- failed to identify funding streams and their connections to strategies
- failed to adequately identify, prioritize, or explore the needs of manufactured housing residents





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### Highlights (Continued)

**Shakopee** - Figuring out how to consolidate their parks while upholding resident needs

**Fridley** - Both good and bad language

**Blaine** - Planner thought their plans were great and they did not need to meet - but draft was worse than original - forgot to discuss their loan program in 2018 draft language

**St. Anthony** - Decided not to meet because Lowry Grove closed, no anticipated manufactured housing in area - but what about Urban Grove?

**Hastings** - Using park as transitional housing

**Oakdale/Forest Lake** - Removed useful information after getting feedback, although Oakdale added R6 zone



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### Forest Lake - Original Language

“MOBILE HOME PARK This area consists of manufactured homes within Forest Lake. One park is located just east of Hwy 61 and south of Southeast 15th Avenue” (3-5). “Table 3.1- Existing Land Use Inventory Existing Land Use Category Gross Acres Net Acres Gross Percent Net Percent Mobile Home Park 32.72 24.40 0.14% 0.11%” (3-5). “The two areas of the City that exhibit the most widespread evidence of deferred maintenance would be the mobile home park located at Highway 61 and Lee Street and a small pocket of detached single-family homes and townhomes that are bounded by 11th Avenue SW, 8th Street SW, 9th Avenue SW, and 12th Street SW. Although the homes in this area are less than 30 years old, there are numerous examples of peeling paint, broken windows and doors, unkempt lawns, and strewn pieces of garbage or other unwanted items. Despite such evidence, there are still plenty examples of well-maintained homes in this area. Moreover, there are two newly built homes along 9th Avenue SW that are currently for-sale, which helps to enhance the image of the area” (4-10). “Manufactured (or modular) housing is a product that has gained acceptance in the market in other smaller cities and towns in Greater Minnesota; Rochester and Marshall are two examples. Industry estimates show that 18% of all new homes sold in Minnesota are manufactured or modular homes. These units are manufactured in a factory, disassembled, and then re-constructed on a home site. This method translates into savings for buyers, as purchase costs can average between 20 and 50 percent below new traditional housing types. It is very important, however, that manufactured housing is of high-quality and follows architectural styles that fit Forest Lake” (Conclusions and Recommendations, 57-58).



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### **Forest Lake - 2018 Draft Language**

“Table 4-1 - Housing Conditions Housing Units Number of Units Percent of Total Manufactured Homes 128 2%” (40). “Figure 4-2 - Proportion of Housing Types 2% Manufactured Home” (41). “Figure 4-1 - Housing Types in Forest Lake” (41). “Figure 4-3 - Tenure by Units in Structure Manufactored Home 1%” (42).



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### **Recommendations to Metropolitan Council:**

- View comprehensive plans as tools for implementing positive system change, rather than as guidelines for basic compliance.
- Focus on requiring specific strategies and identification of funding streams, not just goals.
- Continue to consider and be sensitive to the political dynamics of the comprehensive planning process, and that city officials may be incentivized to add less substance into their plans because they are wary of being held accountable. Identifying the incentive structures city officials encounter regarding planning for providing affordable housing may help ensure that the comprehensive planning process is more effective to support positive change.



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- Continue to explore potential strategies and funding methods that directly support cities' ability to support manufactured housing communities, such as its Manufactured Home Park Preservation Project, and to examine whether these methods can be scaled up across the Metropolitan Area and beyond. The Guide to Manufactured Housing Best Practices we prepared for our initial letters outlines potential pathways to investigate (See Appendix 1, pg. 5).
- Consider a required section to be included in future comprehensive plans that details strategies and funding to support manufactured housing. The evaluation schema we prepared for our comprehensive plan draft follow-up letters (See Appendix 3) can help provide structure for this section.
- Review the Livable Communities Act and whether any improvements can be made to better align the incentive structures it creates to preserve and add affordable units with the process of strategic planning, the preservation of affordable and manufactured housing, the wellbeing of residents, and the commitment of cities to improve in these areas.



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# Questions?

## Thank You!

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