



# All Parks Alliance for Change ■ APAC

*An Organization of Manufactured Home Park Residents*

October 5, 2018

Ms. Janice Gundlach  
Director of Planning  
City of New Brighton  
803 Old Highway 8 NW  
New Brighton, Minnesota 55112

Dear Ms. Gundlach:

We are writing to follow up on our first letter, dated January 19, 2018, which discussed manufactured housing and New Brighton's Comprehensive Plan 2018 update.

## **Manufactured Housing Language in New Brighton's 2040 Comprehensive Plan Draft**

To help you complete your draft, we created the following schema for evaluating Comprehensive Plan language as it relates to manufactured housing.

**Negative** – Mention of manufactured housing in the Comprehensive Plan draft is negative, whether furthering stigma, calling for closure, or describing plans for redevelopment, zoning, or land use changes that reduce protection of manufactured housing parks.

### **Examples of Negative Language from New Brighton's 2040 Comprehensive Plan Draft:**

According to pages 3-20 and 3-21 of the draft, existing land use categories included "Manufactured Homes" and/or "Mobile Home Park," but the draft's description of future land use categories on page 3-26 have replaced this protective category for manufactured housing with "Medium Density Residential," a less protective designation for what currently exists as manufactured housing parks.

There does not appear to be any discussion that justifies this change in the draft, and this is a way that the City is making the park more vulnerable to redevelopment through its Comprehensive Planning process, not less vulnerable.

**Invisible** – Little or no mention of manufactured housing or relevant data exists in the Comprehensive Plan draft, or clear opportunities to provide meaningful data on manufactured housing are present but not acted upon. Similar to the category, "Purely Descriptive," described below, the category, "Invisible" applies to Comprehensive Plans that fail to substantially engage with strategies that support a city's manufactured housing. Engaging with and supporting all residents ensures that the entire community is strengthened in the long-run.

### **Manufactured housing is mentioned in draft.**

**Purely Descriptive** – Mention of manufactured housing is limited to statistics related to how much manufactured housing exists in the city, or other basic facts without discussion of improvement. The Comprehensive Plan draft provides an important opportunity for describing methods of supporting manufactured housing in the City as an unsubsidized and primarily owner-



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occupied affordable housing resource, and an important source of affordable housing in New Brighton. The City can go further in describing tangible support strategies for these communities.

## **Examples of Purely Descriptive Language from New Brighton's 2040 Comprehensive Plan Draft:**

"On the other hand, New Brighton has a total of 362 manufactured home units, which comprise a total of 46.38 acres located in two-manufactured home parks. The existing density for manufactured housing is 7.7 units per acre" (3-20).

"Table 3-1. Existing Land Use (2016) ... Manufactured Homes ... Acres 46.38 ... % of Whole 1.02" (3-20).

"Table 4-1. Mobile Home Park ... Total Units 364 ... Percent of Total 3.8 ... Percent Owner Occupied 80.8%" (4-40).

**Identifies manufactured housing as affordable housing** – Comprehensive Plan language clearly states that manufactured housing provides affordable housing in the City.

## **Examples of language identifying manufactured housing as affordable from New Brighton's 2040 Comprehensive Plan Draft:**

None

**Identifies clear strategies to support manufactured housing** – Comprehensive Plan language describes tangible methods to improve manufactured housing.

## **Examples of clear strategies to support manufactured housing from New Brighton's 2040 Comprehensive Plan Draft:**

None

**Identifies funding sources to support manufactured housing** – Comprehensive Plan language describes funding sources that can be used to improve manufactured housing.

## **Examples of funding sources to support manufactured housing from New Brighton's 2040 Comprehensive Plan Draft:**

None

**Connects improvement strategies to funding** – Comprehensive Plan language describes both clear strategies to improve manufactured housing and identifies funding sources that can be applied towards them.

## **Examples connecting strategies to funding from New Brighton's 2040 Comprehensive Plan Draft:**

None

New Brighton's 2040 Comprehensive Plan draft does not **identify manufactured housing as affordable housing, identify clear strategies to support manufactured housing, identify funding sources to support manufactured housing, or connect improvement strategies to**



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**funding** in detail. New Brighton can improve its language towards manufactured housing across all of the categories described above, so that the draft's treatment of manufactured housing is more supportive of this valuable affordable housing resource.

If your City has additional ways that it supports manufactured housing that are not clearly mentioned, we encourage you to address them explicitly in your updated Comprehensive Plan.

Based on our analysis, we would like to make the following specific recommendations:

- Create, describe, and maintain a policy of at least a one to one ratio replacement of affordable housing units if any are removed from the City's housing stock.
- Fill vacancies in parks.
- Incentivize the current owners of manufactured housing parks to sell to residents by creating incentives to do so, which could include forgiving back-taxes, utilities, or providing tax breaks if it is sold to a non-profit with the intention of creating a resident-owned community. Creation of a resident ownership-structure can help reduce tensions between residents and management, provide incentives for residents to get even more involved in supporting the well-being of their community, and ensure that manufactured housing parks remain a valuable affordable housing resource.

In general, it would help to reflect on the following key points regarding manufactured housing and to incorporate them in your updated comprehensive plan language:

- Manufactured housing is unsubsidized affordable housing.
- Manufactured housing provides more affordable housing in Minnesota than any other form of affordable housing.
- Manufactured housing is valuable to local businesses because it provides workforce housing.
- Manufactured housing provides owner-occupied housing.
- Manufactured housing provides housing to seniors, youth, and low-income individuals, enabling them to stay in a neighborhood and community they value.
- Modern construction of manufactured housing is more cost-effective, generates less waste, is more energy efficient, and more timely than site-built housing.
- Manufactured housing communities are more stable than terms like "mobile homes" or "trailers" suggest, and homes often stay in place and are used like any other type of residence for many years.
- Many issues can be resolved through the creation of a resident-owned community, which incentivizes residents to invest in their park.

We encourage you use the 2018 update process as an opportunity to incorporate positive language towards manufactured housing into your City's 2040 Comprehensive Plan. Doing so does not need to be overly complicated. Start by identifying manufactured housing as an



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affordable housing resource, describe tangible ways that it can be improved, and identify funding opportunities that support these methods.

We encourage you to contact us when you are working on issues related to manufactured housing. We can help you engage with residents and resolve problems with satisfactory outcomes for all parties. Thank you.

Sincerely,

Owen Hawkins  
Program Associate

Dave Anderson  
Executive Director