



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

November 30, 2018

City Planner
Watertown City Hall
309 Lewis Avenue South
Watertown, Minnesota 55388

Dear City Planner:

We are writing to follow up on our first letter, dated March 2, 2018, which discussed manufactured housing and Watertown's Comprehensive Plan 2018 update.

Manufactured Housing Language in Watertown'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.

No obvious examples in draft.

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. It could be discussed at more length.

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

Examples of Purely Descriptive Language from Watertown's 2040 Comprehensive Plan Draft:

See Table 3-10 on Page 3.15.

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

Example of language identifying manufactured housing as affordable from Watertown's 2040 Comprehensive Plan Draft:

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None

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

Example of a clear strategy to support manufactured housing from Watertown's 2040 Comprehensive Plan Draft:

“Watertown's subdivision ordinance has standards for accommodating sidewalks and trails within new developments. There are a few places where sidewalks are required, including mobile home parks and certain Planned Unit Developments” (6.32). This passage is ambiguous. If it is saying that sidewalks should be installed within Watertown's manufactured home communities, it could set forth a clear strategy that describes how this will be accomplished.

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 Watertown'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 Watertown's 2040 Comprehensive Plan Draft:

None

Watertown's 2040 Comprehensive Plan draft could clearly **identify manufactured housing as affordable housing, identify strategies to support manufactured housing, identify funding sources to support manufactured housing, and connect improvement strategies to funding.** Watertown can improve its language towards manufactured housing across all of the categories described above, so that the draft's treatment of manufactured housing is not invisible, or purely descriptive.

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 draft.

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.
- Create additional protective land use and zoning designations for manufactured home communities.



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- 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 the value of manufactured housing and to address 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 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