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An Organization of Manufactured Home Park Residents

Report to Metropolitan Council

Manufactured Housing and 2018 Comprehensive Plan Updates

All Parks Alliance for Change

Prepared by Owen Hawkins and Dave Anderson

April 27, 2020



Table of Contents

1. Cover Letter.....	3
2. Introduction.....	4
3. Project Timeline.....	5
4. Methodology.....	6
5. Analysis.....	13
6. Discussion.....	18
a) Meetings with City Officials and Planners.....	19
b) Cities Where Affordable Housing is Addressed Primarily by Manufactured Housing.....	20
c) The Livable Communities Act of 2011.....	20
d) Loan Programs.....	20
e) General Responses.....	20
7. Conclusion.....	23
Appendix 1 – Example of Tailored Letter	
Appendix 2 – Example of Form Letter	
• Guide to Manufactured Housing Best Practices	
• Sample Positive language	
• Recommendations to Greater Minnesota	
• Example of Loan Program Language	
Appendix 3 – Example of Draft Review Letter	
Appendix 4 – Averages Comparing Original and Draft Language	



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April 27, 2020

Ms. Lisa Barajas
Community Development Director
Metropolitan Council
390 Robert Street North
St. Paul, Minnesota 55101
Lisa.barajas@metc.state.mn.us

Dear Ms. Barajas:

I write on behalf of All Parks Alliance for Change (APAC) to share with you the results of a four-year advocacy campaign on behalf of manufactured housing residents. As we discussed with you in 2018, we undertook an initiative to improve the treatment of manufactured housing by Metropolitan Area cities in 2018 comprehensive plan updates.

Our work on this project was guided by the following 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.
- 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.

We encourage you to review the enclosed materials and contact us when you are working on issues related to manufactured housing. We can help you engage with residents and other stakeholders to achieve satisfactory outcomes for all parties.

If you have any questions, please contact us at (651) 644-5525 or info@allparksallianceforchange.org.

Sincerely,

Owen Hawkins
Program Associate

Dave Anderson
Executive Director



2. Introduction

Manufactured housing occupies a unique position as a residential living option. It provides an unsubsidized form of naturally occurring affordable housing, and allows residents to obtain homeownership, stay close to valued community resources like schools, provide labor to local businesses, and to develop upward economic mobility in tight-knit community settings. Twin Cities Metropolitan Area cities are facing a severe shortage of affordable housing, a reality that suggests that leveraging all potential resources, including manufactured housing, is in the best interest of these communities.

In pursuit of the goals mentioned in our cover letter, this project explored the relationships between advocacy, research, and planning at the government and community level. We asked the following 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?

Our project provided many opportunities to reflect upon these questions as we reviewed and evaluated the language in comprehensive plans, crafted advocacy letters, and sat down to meet with public officials. This project coincided with current events related to manufactured housing that brought insights to our work, such as the Lowry Grove closure in St. Anthony, Burnsville's decision to use criminal rather than civil enforcement of its housing code against park residents, and the ongoing struggle over the TCAAP site redevelopment between advocates, residents, and the City of Arden Hills. These events helped us appreciate the connection between policy and the lived experience of manufactured housing residents, highlighting the need for improved treatment in policy and practice of this large but vulnerable population.



3. Project Timeline

We began planning the project and conducted initial research in January 2016. Our first letters were sent between October 2016 and May 2017, which consisted of our “Snapshot” tailored to each city and a Guide to Manufactured Housing Best Practices (See Appendix 1, pgs. 3-4). This first round included the following cities:

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

From July 2017 to September 2017, we scheduled and conduct in-person meetings with planners and officials from the following cities:

Arden Hills	Inver Grove Heights	Maplewood
Bloomington	Lakeville	Mounds View
Fridley		

Our next letters were sent between December 2017 and January 2018 to the following cities:

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

From March 2018 to September 2018, we scheduled and conducted in-person meetings with city planners and officials of the following cities:

Hastings	Landfall	Shakopee
Hilltop	Little Canada	Vadnais Heights
Lake Elmo		

On March 2, 2018, additional cities received a form letter (See Appendix 2) that included supplemental resources brought to our in-person meetings with the city officials. These documents included our Guide to Manufactured Housing Best Practices, excerpts from APAC’s Report to the Greater Minnesota Housing Fund, Sample Positive Manufactured Housing Comprehensive Plan Language, and Sample Loan Language.



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The following cities received our materials:

Belle Plain	Jordan	Roseville
Coon Rapids	Linwood Township	Shoreview
Corcoran	Lino Lakes	South St. Paul
Cottage Grove	Norwood-Young America	Spring Lake Park
East Bethel	Oakdale	St. Francis
Forest Lake	Ramsey	St. Paul Park
Grant	Richfield	Waconia
Ham Lake	Rockford	Watertown
Hugo	Rosemount	

Between September 2018 and December 2018, a final letter was sent to provide an evaluation (See Appendix 3) of available comprehensive plan drafts to the following cities:

Arden Hills	Hastings	Plymouth
Apple Valley	Hugo	Ramsey
Blaine	Inver Grove Heights	Richfield
Bloomington	Jordan	Shakopee
Burnsville	Lake Elmo	Shoreview
Coon Rapids	Lexington	Vadnais Heights
Corcoran	Lino Lakes	Waconia
Cottage Grove	Maplewood	Watertown
Forest Lake	New Brighton	
Fridley	Oakdale	

Our research culminated in our evaluation of this project and this report to Metropolitan Council.

Methodology

Our project involved the following steps:

1. Prioritize cities to contact based on number of manufactured home communities and residents.
2. Compile PDF copies of current comprehensive plans in relevant cities.
3. Use keyword searches (“manufactured,” “mobile,” and “trailer”) to pull language from comprehensive plans discussing manufactured housing. Language discussing manufactured and affordable housing was almost always found in the Land Use and Housing chapters, occasionally with additional information found in appendixes or water and sewer plans.



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4. Compile references to manufactured housing in a spreadsheet.
5. Compile “snap-shots” of each prioritized city as related to manufactured housing, including information on the following data points (See Appendix 1, pg. 3):
 - a. City Fair Market Rent (FMR) compared with average lot rent at manufactured housing communities in the city
 - b. Total Lots
 - c. Vacant Lots
 - d. Vacant Homes
 - e. 2014 population
6. Complete an analysis of Strengths, Weaknesses, Opportunities, and Threats for letters tailored to a specific city (See Appendix 1, pg. 4).
7. Conduct policy research to describe and prioritize the following recommendations to cities, compiled in a “Guide to Manufactured Housing Best Practices” (See Appendix 1, pg. 5):
 - a. Use manufactured housing to address affordability without new large-scale multifamily construction.
 - b. Change ordinances to allow manufactured homes to be sited in residential districts outside existing parks.
 - c. Improve each city’s level of affordable housing by reducing loan barriers to move residents into currently available manufactured housing units.
 - d. Generate funding opportunities for repair and maintenance, and set standards for infrastructure in manufactured housing parks.
 - e. Encourage resident purchase of communities through local tax incentives and “Right of First Refusal” purchase opportunities.
 - f. Promote manufactured housing within comprehensive plans and other city outlets as a primary unsubsidized affordable homeownership option for low-income working residents.
 - g. Actively reduce stigma against manufactured housing.
8. Set up meetings with city planners and/or officials managing the 2018 comprehensive planning update for prioritized Metropolitan Area cities.
9. Create a form letter template sent to additional Metropolitan Area cities (See Appendix 2).



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10. Create an evaluation schema and apply it to 28 comprehensive plans released for review in the last half of 2018 (See Appendix 3). We categorized the language in the plans to help city planners improve their draft language towards manufactured housing as follows:
 - **Negative** – Mention of manufactured housing in the Comprehensive Plan draft is negative, whether stigmatizing, calling for closure, or describing plans for redevelopment, zoning or land use changes that reduce protection of manufactured housing communities.
 - **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 mention or discuss a city’s manufactured housing.
 - **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 substantive 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. The City can go further in describing tangible support strategies for these communities.
 - **Identifies manufactured housing as affordable housing** – Comprehensive Plan language clearly states that manufactured housing provides affordable housing in the City.
 - **Identifies clear strategies to support manufactured housing** – Comprehensive Plan language describes tangible methods to improve manufactured housing.
 - **Identifies funding sources to support manufactured housing** – Comprehensive Plan language describes funding sources that can be used to improve manufactured housing.
 - **Connects improvement strategies to funding** – Comprehensive Plan language describes both clear strategies to improve manufactured housing and identifies funding sources that can be applied in support of those strategies.



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11. Create web pages documenting project materials, supporting outreach to manufactured housing residents and encouraging participation in comprehensive planning processes (See website: <http://www.allparksallianceforchange.org/?q=promote-mh>).
12. When applicable, letters addressed current events as they applied to manufactured housing communities, including in the following cities:
Arden Hills Burnsville Shakopee St. Anthony

Scoring Comprehensive Plan Language

1. Use keyword searches (“manufactured,” “mobile,” and “trailer”) to pull language from 2018 drafts discussing manufactured housing.
2. Compile a spreadsheet (Appendix 4) that allows for a side by side comparison of previous comprehensive plan language and 2018 draft language per city. Only 28 drafts were available to review.
3. Building on the initial evaluation, develop an evaluative schema to compare previous comprehensive plan language and 2018 drafts as either favorable or unfavorable towards manufactured housing.
4. Evaluate comprehensive plan language based on the following criteria:
 - **+3** – Language in the comprehensive plan describes manufactured housing in a positive way. The city describes the intention to actively support manufactured home parks in the city with policies and/or ordinances, such as financial programs made available to manufactured home park residents that assist with home repair, or other similar supportive programs. Typically, comprehensive plan language that we have scored with a +3 also describes manufactured housing as having its own zoning or land use category.
 - **+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.



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An Organization of Manufactured Home Park Residents

- **+1** – Language discusses manufactured housing in a positive way, however, the city does not discuss any plans or desires to protect manufactured home parks. If the city has a specific zone for manufactured housing, we've also given the city a score of +1, even if the city only refers to manufactured housing within its borders as existing, and does not refer to such housing in a positive or negative light.
- **0** – A city describes the existence of manufactured housing, but is totally 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. We could not determine if oversight was intentional or a genuine mistake on the part of city planners.
- **-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”). This vocabulary indicates the city’s attitudes toward manufactured housing residents. If a city is indifferent towards manufactured housing, but manufactured housing is zoned as a “conditional use only,” we have given it a -1, as well. This type of zoning is less permanent, and creates a risk to manufactured home parks.
- **-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. However, the city is not making concrete plans, and/or leading an effort to remove manufactured housing. Language receiving this score explains that the city will not support manufactured housing parks within the city if they experience problems. As an example, a city explicitly states it will not extend municipal sewage and water if a park’s private septic system fails.
- **-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



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An Organization of Manufactured Home Park Residents

directly lead efforts to redevelop manufactured home parks, as well as laying out a specific timeline to do so.

5. Apply these criteria to both the previous comprehensive plans and the 2018 draft language to establish a baseline score.
6. Add or subtract additional points based on the original categories used in our draft evaluation letters to arrive at a final score:

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)

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)

7. Compare final scores for previous and draft language in order to assess net positive or negative change. The change value identifies positive and negative movement between original and 2018 draft language.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

8. Evaluate each of the ways we interacted with city planners to assess which was most effective: sending form letters, sending tailored letters, and meeting face-to-face.
9. Generate a content analysis to better assess the distribution and frequency of city language across our evaluation schema.

Each of the 28 cities we obtained drafts from received a score for its prior comprehensive plan language, generally being published around 2008, and for the draft it made available in 2018 (See Appendix 4). Comparing the two versions allowed us to compute a value for change between previous language and new draft language, laid out in Table 1 below.

Disclaimers on Methodology

Assigning numbers to qualitative information involves inherent subjective judgment. We attempted to keep this process as simple as possible to avoid distortions and use our evaluative schema as a basic analytical tool to point out roads for further inquiry and research rather than as an authoritative final assessment.

We attempted to avoid double counting when criteria could be included in both a baseline score and a final score. In other words, if language met criteria that helped us assess a baseline score, we avoided counting it again to arrive at a final score.

Cities' language will sometimes move a step back in one category and forward in another, giving the impression of no net change, which is somewhat misleading (See Corcoran, Table 1). Therefore, change or lack of change in an overall score may not reflect changes for particular criteria. This analysis cannot account for the complexity of each city's unique context and the dynamics it faces in addressing manufactured housing. While two cities may both demonstrate a net change of +2, for example, one may have achieved this score by adding language to its draft in support of a manufactured home rehabilitation loan program, while another may have added emphasis to the importance of manufactured housing in its role as naturally occurring affordable housing.

Addressing which variables are more or less important in generating long-term outcomes for manufactured housing residents is beyond the scope of this project, but could be an important focus in future research. Our scoring method also cannot fully capture the less tangible positive impacts of educating the public, officials, and building discursive awareness and positive momentum in this field.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Problems regarding the small sample size may affect the objectivity of our data, but at face value, our data suggests improvement in comprehensive plan language, particularly among the cities we interacted with more closely. Any implicit bias on our part to inflate scores in a positive direction was unintended and if present, unconscious.

Analysis

Overall, cities' comprehensive plans demonstrated positive improvements between original language and draft language. Reviewing the 28 cities that completed a draft between June 2018 and December 2018 allowed us to identify improved or worsened language and project an approximate value of positive or negative change. Given constraints of time and capacity that limited this project, we used several types of interactions to reach cities with our messaging. We classified our interactions with cities according to as those that received a **form** advocacy letter (F), those that received a **tailored** advocacy letter (T), and those that received a tailored letter and also participated in an in-person **meeting** (M). We did not attempt to meet with any cities receiving a form letter, although draft evaluations were sent to cities that submitted a draft by December 2018, including to both those receiving form and tailored content.

As a method of comparison for reviewing whether we made progress in our advocacy, we took averages of scores based on our interactions for the cities we were able to obtain drafts from, including for cities receiving tailored content, tailored content with face-to-face meetings, and form content. Cities could obtain a final score on a range between -6 points and +7 points, after combining baseline and additional criteria.

The average score of the original comprehensive plans among the 28 cities that submitted drafts and received our evaluations was approximately -0.07 points. The average score of the 2018 drafts of the same group of cities was approximately 1.0 points and the average change of these cities' language between originals and drafts was positive, at 1.07 points (Appendix 4). This suggests that if our scoring methodology is accurate, our campaign apparently had at least a small positive impact. This scoring method does not attempt to compensate for unmeasurable factors or standard error, or a small sample size due to the constraints of obtaining enough drafts within the time frame mentioned above. Rather than arriving at a definitive outcome, our evaluation suggests avenues for further inquiry and research, and supports the opinion that this project may have helped improve draft language overall.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Cities that received our tailored letters without meetings apparently improved the least between previous language and 2018 draft language. We were not able to receive many drafts by the end of 2018, so our sample size is very small for this pool, at a total of four. Our tailored letters included specific analyses of local rent compared to average manufactured housing lot rent, a SWOT analysis of cities' specific strengths, weaknesses, opportunities, and threats as they relate to manufactured housing, and a discussion of current events related to manufactured housing, if applicable. Cities receiving tailored content exhibited an average change value of positive 0.25 points. The average score of the previous comprehensive plans of this group was 1.0 point, with an average draft score of 1.25 points (Appendix 4).

Cities receiving tailored content and holding a meeting with us exhibited an average change value of positive 1.3 points (Appendix 4). The average score of the previous comprehensive plans of this group was approximately 0.2, with an average draft score of 1.5 points. Cities that received our form letters with no meeting or tailored content demonstrated an average change of positive 1.13 points. The average score of the original comprehensive plans of this cohort of cities was approximately -0.53 points, with an average draft score of positive 0.6 points. Although small, all three groups appear to have demonstrated positive change in 2018 draft language.

Not all cities we sent advocacy letters to submitted drafts for public review by December 2018, so our analysis of change is limited to the 28 that we could obtain drafts from. We did not review final comprehensive plans after submitting our draft evaluations, so we are not currently aware of the effect of this final step. It is possible that in an analysis of more drafts or final versions, additional positive or negative change could have been shown, or that cities changed their language minimally between the draft and final stage.

By applying our scoring criteria, we attempted to assess not only general attitudes towards manufactured housing contained in the content of comprehensive plans, but also whether the cities went beyond talking about basic statistics to setting clear goals for manufactured housing, and the extent to which they committed to these goals by providing concrete details in the form of actionable steps and identifying related funding sources. Our Content Analysis, compiled in Table 2 and Table 3, shows the distribution of cities' language that fit into our baseline and additional evaluative categories.



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Table 1 – City Ranking and Averages (28 Cities Submitting Drafts)

	City	Interaction (M, T, F)	Original Score	Draft Score	Change
			-0.07	1.0	1.07
1	Apple Valley	F	-3	+3	+6
2	Shakopee	M	-3	+2	+5
3	Richfield	F	-3	+1	+4
4	Inver Grove Heights	M	0	+3	+3
5	Oakdale	F	-3	-1	+2
6	Ramsey	F	-1	+1	+2
7	Shoreview	T	-1	+1	+2
8	Coon Rapids	F	+1	+3	+2
9	Bloomington	M	-1	0	+1
10	Fridley	M	+2	+3	+1
11	Lexington	F	-1	0	+1
12	Vadnais Heights	M	-1	0	+1
13	Waconia	F	-1	0	+1
14	Maplewood	M	+1	+2	+1
15	Hastings	M	0	+1	+1
16	Burnsville	T	+3	+3	0
17	Watertown	F	0	0	0
18	Cottage Grove	F	0	0	0
19	Hugo	F	+1	+1	0
20	Jordan	F	0	0	0
21	Lino Lakes	F	+1	+1	0
22	New Brighton	F	-1	-1	0
23	Plymouth	T	-1	-1	0
24	Arden Hills	M	+1	+1	0
25	Forest Lake	F	0	0	0
26	Blaine	T	+3	+2	-1
27	Lake Elmo	M	+3	+2	-1
28	Corcoran	F	+2	+1	-1



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Table 2 – Content Analysis – Baseline Criteria (28 Cities Submitting Drafts)

<u>Initial Baseline Criteria</u>	<u>2008 Original</u>	<u>Count (%)</u>	<u>2018 Draft</u>	<u>Count (%)</u>
+3 Specific Plans for Support	Blaine, Lake Elmo	2 (7%)		0 (0%)
+2 Open to Providing Support	Burnsville, Fridley	2 (7%)	Apple Valley, Burnsville, Coon Rapids, Fridley, Inver Grove Heights, Lake Elmo, Richfield, Shakopee	8 (29%)
+1 Positive Description of Parks	Arden Hills, Coon Rapids, Hastings, Hugo, Jordan	5 (18%)	Arden Hills, Blaine, Hugo, Jordan, Maplewood	5 (18%)
0 Neutral Description of Parks	Bloomington, Corcoran, Cottage Grove, Inver Grove Heights, Lino Lakes, Maplewood, New Brighton, Plymouth, Ramsey, Vadnais Heights, Waconia, Watertown	12 (43%)	Corcoran, Cottage Grove, Forest Lake, Hastings, Lino Lakes, New Brighton, Oakdale, Plymouth, Ramsey, Vadnais Heights, Waconia, Watertown	12 (43%)
-1 Negative Description of Parks	Apple Valley, Forest Lake, Lexington,	3 (11%)	Lexington	1 (3%)
-2 Open to Park Redevelopment	Richfield, Shoreview	2 (7%)	Shoreview	1 (3%)
-3 Sets Goal for Redevelopment	Oakdale, Shakopee	2 (7%)		0 (0%)



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Table 3 – Content Analysis – Additional Criteria (28 Cities Submitting Drafts)

<u>Additional Criteria</u>	<u>Original</u>	<u>Count (%)</u>	<u>Draft</u>	<u>Count (%)</u>
Negative -1 (Negative language present)	Arden Hills, Blaine, Lexington, Oakdale, Waconia	5 (18%)	Arden Hills, Fridley, Lexington, Oakdale	4 (14%)
Invisible: -1 (No substantive discussion of manufactured housing)	Apple Valley, Hastings, Jordan	3 (11%)	Jordan, Oakdale	2 (7%)
Purely Descriptive: -1 (Stats/Basic Facts only)	Apple Valley, Bloomington, Coon Rapids, Inver Grove Heights, New Brighton, Plymouth, Ramsey, Richfield, Vadnais Heights	9 (32%)	Bloomington, Coon Rapids, New Brighton, Plymouth, Richfield	5 (18%)
Identifies manufactured housing as affordable housing: +1	Arden Hills, Blaine, Coon Rapids, Corcoran, Lino Lakes, Maplewood	6 (21%)	Apple Valley, Arden Hills, Blaine, Coon Rapids, Corcoran, Fridley, Inver Grove Heights, Lexington, Lino Lakes, Maplewood, Shoreview	11 (39%)
Identifies clear strategies to support manufactured housing: +1 (Support strategies described)	Burnsville, Corcoran, Lexington, Oakdale, Shoreview	5 (18%)	Bloomington, Coon Rapids, Hastings, Lexington, Maplewood, Oakdale, Shoreview	7 (25%)
Identifies funding sources to support manufactured housing: +1 (Funding sources described)		0 (0%)	Shoreview	1 (3%)
Connects improvement strategies to funding: +1 (Strategies connected to funding sources described)		0 (0%)	Burnsville, Fridley, Ramsey	3 (11%)



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

When looking at original 2008 comprehensive plans as a baseline, we observed that the highest percentage contained neutral/invisible or positive language (at 43% and 18% respectively). When looking at 2018 drafts, language also tended to fit within the neutral (43%) or positive (18%) categories. In our additional evaluation, most language fit within the purely descriptive category (32% of 2008 originals and 18% of 2018 drafts). Fewer cities' language at the original or draft stages was either clearly negative, nor clearly positive for both our baseline and additional criteria. Cities that were open to providing support to manufactured housing communities increased from 7% in 2008 to 29% in the 2018 drafts, which represents an important improvement.

We wanted to see language that went beyond stating that manufactured housing simply existed, or worse, ignoring it altogether, to a process of laying out tangible strategies and identifying funding sources to support these strategies. Without specific and assignable action steps that help cities meet their goals for manufactured housing, we are left wondering how cities plan to move from describing their goals to tangibly implementing them.

Discussion

As our research progressed, it became clear that comprehensive plans can be analyzed from multiple perspectives. Comprehensive plans, at face-value, are strategic planning documents stemming from the need for cities to comply with Metropolitan Council's regulations that mandate their publication. Comprehensive plans require cities to engage with and describe how the city will handle a wide range of issues that are integral to the governance of a city and its residents' wellbeing. We were interested in discovering the extent to which cities incorporated manufactured housing into or left it out of the future they described for their community. Our advocacy project involved evidence-based messaging strategies that highlighted the benefits of manufactured housing, encouraging manufactured housing to be considered as an important part of the city's future and well-being.

Comprehensive plans are also political documents, in that they provide a degree of transparency to hold local governing bodies accountable, which inevitably places pressure on cities and officials to be careful about what information they present and how they present it. Comprehensive plans describe commitments that cities are willing to make to the public, which necessarily entail costs and benefits. The common avoidance of using concrete details to describe city manufactured housing in comprehensive plans suggests that a low willingness to commit support to these residents is widespread. One aspect of this problem may be that city officials feel less willing to seriously engage and commit to action steps in areas that are highly contested, or that generate NIMBY (Not in My Back Yard) sentiments in constituents, such as affordable and manufactured housing. Our campaign attempted to shift the discussion from the stigma that typically burdens the manufactured housing community to highlighting the potential of manufactured housing and its role as a unique, unsubsidized resource. We attempted to make it clear that manufactured housing provides opportunities for unsubsidized affordable homeownership, making it easier for low-income individuals to attain upward mobility, and to stay closer to preferred jobs, school districts, and general amenities. The presence of this form of housing provides workforce, life-cycle, and senior housing that serves multiple purposes for communities, including local business interests. Whenever possible, academic literature was cited in support of these claims.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Meetings with City Officials and Planners

Our meetings with city officials were important in that they gave us insights into how the comprehensive plan is constructed, a process that illuminates the inner workings of city governance. We became particularly aware of the power dynamics between city planners and city councils, and that advocating for improved language is partly about knowing who has the power to change it and presenting arguments they find tenable, whether to an outside consultant, the planner, or city council. For example, although the planner may understand and agree with the points we raised, it is unknown if the city council does as well or how those considerations were communicated.

We were surprised by some denials to meet with us we received from a few planners. Burnsville's planner stated that they were unwilling to meet with us while litigation over city code enforced against manufactured housing residents was ongoing. Blaine's planner felt that they did not need to meet with us because they were busy and felt confident about their draft language, but were willing to review any recommendations we would provide by mail. According to our scoring method, Blaine's original 2008 language was actually better than their draft language because it included mention of their loan program, which was omitted in the 2018 draft. Plymouth's city planner did not agree to meet, citing a busy schedule. St. Anthony's planner did not want to meet with us because from their perspective, after the Lowry Grove closure, no manufactured housing existed in their city, and any further discussion was moot. With a new manufactured housing community on the site, this perspective appears short sighted.

Decisions not to engage may reveal the prioritization of capacity and capital of these local governments, causing us to reflect upon the political dynamics of how governing bodies allocate funds and resources according to implicit value judgments and local contexts. The advocate thereby finds him or herself in the role of promoting different values to be considered in the decision-making processes that affect outlays of capital, capacity, and attention.

The above responses, in addition to an often reserved initial reception at our meetings, made us aware that our message and interactions were shaped by our position as advocates, and as such, we were seen as a potentially adversarial party from the viewpoint of public officials. Given this potentially adversarial role, we made every attempt to emphasize how our recommendations are mutually-beneficial both to city health and manufactured housing resident wellbeing.

We engaged with city officials in as constructive a way as possible by emphasizing how manufactured housing is an under-recognized resource to cities and local communities that can be better leveraged, in addition to advocating for the betterment of residents' experience and livelihood. We attempted to make it clear in our meetings and letters that we were there to be constructive rather than combative. Many city officials appeared to feel defensive when we met with them but relaxed after we made it clear that our priority was to foster a collaborative dialogue.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Cities Where Affordable Housing is Addressed Primarily by Manufactured Housing

For several cities that relied entirely on a single manufactured housing community to provide affordable housing in their communities, such as Shoreview and Arden Hills, our recommendations appeared to be particularly motivational for planners. Even though both Shoreview and Arden Hills have a similar reliance upon their manufactured housing as the primary provider of affordable housing to the city, responses to preserving the benefits of manufactured housing were different.

Shoreview provided some of the more constructive language we have observed in a comprehensive plan to support manufactured housing, while Arden Hills made few beneficial changes to its comprehensive plan language or connection to funding and strategies. The Arden Hills planner we met with professed an interest in supporting pathways to a resident-owned community model for preserving Arden Manor as the City's only source of affordable housing, but through our engagement with stakeholders regarding the TCAAP redevelopment project, we are aware that Arden Hill's City Council appears uninterested in supporting affordable housing in its current housing stock or in the form of future units.

The Livable Communities Act of 2011

City officials in general did not appear focused on complying with the Livable Communities Act (LCA), which we assumed would align the importance of identifying and providing additional affordable housing units with their bottom line. It is unclear whether this is because they do not perceive enough value is attainable from the LCA to pursue it, whether they feel that it is too far out of reach, or some combination of these factors. None of our discussions with officials pertained to helping them add affordable housing units specifically for complying with the LCA, although we assumed this would be a primary concern when we started our project.

Loan Programs

Several officials expressed an interest in loan programs to support maintenance and down payment assistance, but were unsure of the details. Loan programs targeting manufactured housing that support down-payment assistance, maintenance, and infrastructure could provide an important step forward in engaging cities to support this resident population. Cities could help identify pathways for obtaining loans for this marginalized group that often faces difficulties obtaining standard loans. Fridley officials provided us with loan language they received from the City of Blaine, which we reworked and attached as our Sample Loan Language document (See Appendix 2).

General Responses

The overwhelming response to our campaign was a basic lack of awareness of manufactured housing in general, and more specifically, of its beneficial role as a resource in providing unsubsidized owner-occupied affordable housing. We observed this primarily in the absence of substantial engagement with manufactured housing in most cities' comprehensive plans as shown in



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

our Content Analysis (Tables 2 and 3), as well as in the generally low levels of awareness of the field of manufactured housing on the part of city planners and officials. Many officials appeared to adopt a “hands off” approach towards their manufactured housing communities. We encountered much confusion about legal and regulatory matters as they pertain to manufactured housing, including whether manufactured housing counts as affordable housing, whether filling vacancies could be counted towards affordable housing goals, and whether it would be allowed as infill housing outside of manufactured housing zones based on current ordinances.

Many officials apparently thought that there was not much they could do for manufactured housing communities even if they wanted to, because manufactured housing is privately-owned. They appeared to see the resilience of manufactured housing communities as a responsibility of the owner of the land, rather than a matter of public governance. Some planners clearly stated that they could not do anything regarding financial support for manufactured housing, and may have been implying that therefore, nothing could be done from their point of view.

In these cases, we highlighted the potential for the city to create pathways for the formation of resident-owned communities, which can greatly reduce the friction between residents and owner/managers. Determining the most effective and efficient methods and best practices city governments can use to support manufactured housing is an important topic for future research.

Given the potential for friction between management and residents, and the disastrous outcomes involving displacement of homes and communities that commonly result, we consider the position that a city should have a “hands-off” approach towards its manufactured housing communities to be unfounded and potentially disruptive to community well-being. A policy agenda that ignores any group of constituents can contribute to the destabilization of the community at large, beyond the boundaries of the manufactured housing park. All members of a society benefit when the most vulnerable members are best cared for, including the most well-off.

A trend towards neutral treatment of manufactured housing was observed, as demonstrated in 43% of both 2008 and 2018 versions. Oakdale, for example, provided a fair amount of negative and some positive language regarding manufactured housing in its original comprehensive plan, and virtually none in its 2018 draft. In this way, not taking a particular stand on these issues could be construed as a strategic approach to an area that public officials feel vulnerable about when it comes to committing resources. Shakopee, the other city with a high amount of negative language in its original plan, also substantially pared back its calls for redevelopment and statements about the negative aspects of manufactured housing. It is a possibility that reducing negative language in 2018 drafts in these two cases stemmed from awareness of officials that they were being scrutinized.

In general, a lack of substantive content in comprehensive plans may be a result of the generally low understanding of manufactured housing in society and the media at large, as well as the likelihood that few officials have had many opportunities to directly engage with advocates pushing for a more thorough examination of manufactured housing and its benefits to cities. Our campaign therefore took on a primarily educational role, and the city planners and officials we were able to meet with generally appeared to appreciate the discussion.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

City officials' positions were informative. The most negative responses we received did not clearly reflect an adverse position towards manufactured or affordable housing, but appeared to explain why they were not focusing on it as a priority. One official in Little Canada stated, "We have enough affordable housing." This suggests that some officials may view affordable housing benchmarks only as a requirement for the purpose of compliance, and once met, little additional support for affordable or manufactured housing is required. Officials in cities that were close to being fully-developed also tended to be less willing to engage with manufactured housing and affordable housing concerns, which prompted us to suggest adding units to existing parks, filling vacancies, and supporting existing communities.

At a minimum, we pressed for language to be added to comprehensive plans acknowledging that manufactured housing provides affordable housing, a point which is often ignored and which is a good place to start identifying opportunities to improve policy. When explicitly addressed, this connection seemed to be readily accepted by officials, which is observed in a higher frequency of recognizing manufactured housing's affordability in 2018 drafts. We observed a jump from 21% to 39% of cities making the connection between manufactured housing and affordability between previous 2008 language and 2018 drafts (Table 3). Although an improvement, the majority of cities still do not identify manufactured housing as affordable in their plans. Officials may need to be more creative to identify ways they can support manufactured and affordable housing, but may also need to more clearly understand incentives to do so. Spelling out that manufactured housing provides unsubsidized affordable units, is generally owner-occupied, and provides residents access to school districts, and businesses access to a local workforce in ways that other housing cannot should be an ongoing focus in advocacy and messaging.

Although we saw positive change overall that should be commended and recognized, and many cities described favorable aspects of manufactured housing, very few cities received points for setting concrete and actionable goals or identifying funding streams. Only 18% percent of cities in 2008 language and 25% of cities at the 2018 draft stage were able to identify and set clear strategies for manufactured housing (Table 3). We note that this was not a very large improvement, and we may have observed additional improvement with a larger sample size. No cities identified a funding stream alone as a potential resource for manufactured housing in 2008 language, and only Shoreview (3%) did so at the 2018 draft stage. Only Burnsville, Fridley, and Ramsey (11%) provided language that connected funds to strategies in 2018 drafts, while none did so in previous versions.

The overall lack of specificity regarding strategies and funding in comprehensive plans is troubling, and suggests several implications for advocacy projects that target planning initiatives at the government level. One question is whether and how the goal-setting involved in planning can actually be implemented, or whether the plan is just "left on the shelf," suggesting a critique of whether planning is an effective exercise that informs social progress, or whether it has a tendency to simply meet minimal regulations for the purpose of compliance and go no further.

The primary use of the comprehensive plan may simply be seen by officials as a goal-setting exercise. This points to a valid critique of the value of strategic planning for creating social change in general. Strategic planning has potential to be effective, but far less so when action steps coordinated with goals are not in place. Goals are representative of values and intentions, but goals and values are generally moot in the long term when they are not connected to actionable steps and corresponding capacity.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

The tendency to treat planning as primarily a goal-setting exercise not only calls into question the role of public officials in creating effective plans, but also the purpose of regulations and compliance as an effective vehicle of positive public sector change. Perhaps social issues are so complex, that it is difficult for officials to move past goals to effective implementation and action steps, or perhaps low capacity of time, capital, and resources incentivizes the widespread practice of meeting minimum standards and going no further. Either way, a lack of substance in planning initiatives has the potential to further compound the insufficient treatment that stigmatized populations like manufactured housing communities receive from governing bodies.

On one hand, a systematic process of identifying and implementing goals, measures, targets, and action plans seems important to addressing improvements and support for vulnerable populations. If cultural and institutional expectations related to planning consistently place the emphasis on goals and simply do not get around to implementing strategies, for whatever reason, it seems probable that local governments will consistently fail to bring effective improvements and support to vulnerable groups like manufactured housing residents.

Conclusion

APAC's work on comprehensive plans has provided useful information supporting the development of our risk assessment tool for manufactured housing communities facing potential closure, offers insights into influencing public sector planning supporting specific target populations, and offers a basis for engaging with Metropolitan Area cities in the future on improving policies towards manufactured housing.

Throughout this project, we assumed that fostering inclusive, collaborative discussion was the most effective method to forge common ground and influence change, and engaging with all stakeholders is in the best interest of both residents and the cities they live in. We are less concerned with facing disagreement than the silence that exists when no forum is present to work through differences of opinion to ultimately identify what constitutes the public good.

Comprehensive planning processes have the potential to facilitate community engagement, democratic participation, and to raise the standards of living of city residents if they are performed well. Based on these observations, we make the following recommendations:

- We recommend that Metropolitan Council and city officials 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.
- We recommend that Metropolitan Council continues 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.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

- We recommend that Metropolitan Council 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).
- We recommend that Metropolitan Council mandate a section to be included in future comprehensive plans that detail 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.
- We recommend that Metropolitan Council 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.

Recent events and media coverage have placed an important focus on manufactured housing as a means to improve affordable housing rates in a geographic area that desperately needs solutions. Now is the time to capitalize on the momentum of this attention by continuing to educate stakeholders about this unique resource, facilitating outreach to communities and promoting democratic engagement in governance, reduction of stigma, and helping improve policy, planning, and legislative frameworks to better address the needs of manufactured housing residents. Clearly identifying incentives to support manufactured housing in messaging to city officials and moving from general goals to specific actions in planning emerge as key considerations for making improvements in this field.