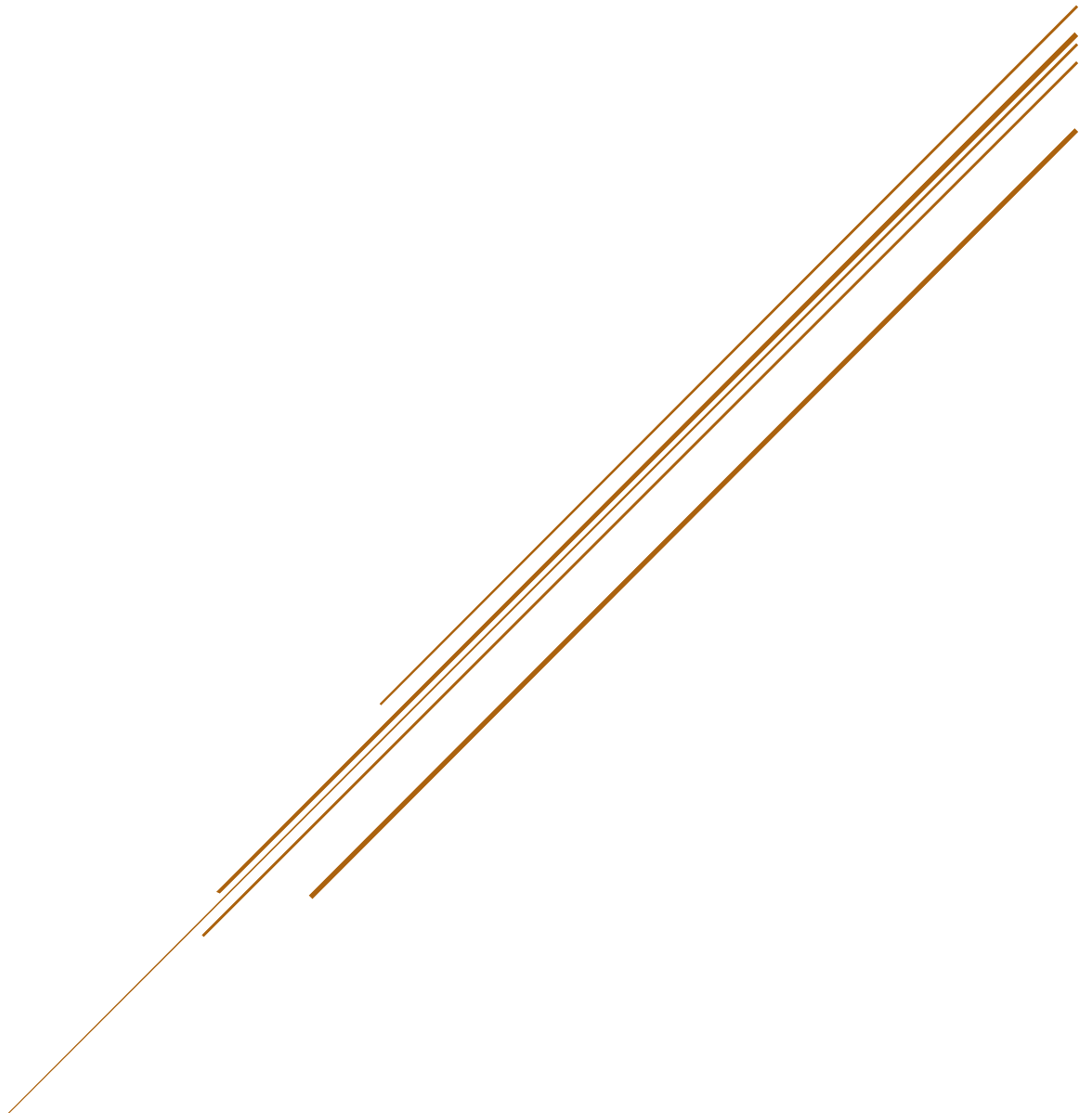


A REVIEW OF OREGON'S MANUFACTURED HOUSING POLICIES

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Introduction

Through the 1940's, the number of manufactured homes was so low that they were not considered their own housing category. These homes were classified in census data as *Other*, along with boats, cabins and other insignificant units. In 1950, when these homes were given their own category, they comprised only 0.7% of all housing stock in the U.S. By the turn of the century, however, manufactured homes had grown to 9.6% of housing stock and the number appeared to be growing (Historical Census of Housing Tables 2011).

Manufactured homes have been increasingly viewed in the last 50 years as an affordable and attainable housing option for low- or moderate-income, aging, and minority populations. In addition to affordability, manufactured homes are valued for promoting “independence, convenience and physical security” relative to renting apartments or duplexes (Affordable Housing Need... 2017).

Though demand for manufactured housing continues to grow, the supply of available manufactured homes and manufactured home parks is decreasing from the pressures of alternative, more profitable development options. Historically, MHPs have been challenged by community members looking to mitigate damage to their own property values by pushing MHPs out of town. In recent years, however, the biggest threat to the survival of MHPs has become the sale of the properties to redevelopers looking to take advantage of their locations in high-value commercial or residential zones.

Oregon recognizes the need to establish protections and encourage new development for this form of housing. Local governments have been tasked with implementing Oregon's land use plans and collaborating with county, state and non-

profit organizations to come up with solutions to preserve existing MHPs in their communities (Local Agency Toolkit, 2016). The actual impact of these policies and collaborative efforts on manufactured housing trends since the 2000's has yet to be measured.

Project Statement and Approach

This project investigates the state and local policies that have been enacted to protect and encourage the growth of needed manufactured housing and manufactured home parks (MHPs) within the state of Oregon.

The first objective of this project is to present community attitudes toward manufactured housing and give the demographics of manufactured home owners and MHP residents. The history of manufactured housing policy will be discussed, focusing on common city-level methods of regulating manufactured housing and unintended consequences of policies.

The second objective is to explore the existing literature on common manufactured housing policies and community attitudes toward manufactured housing. This project will look at existing research on the link between policies and manufactured home use, the demographics of manufactured home owners, and the socio-economic implications of the loss of manufactured home parks to redevelopment.

The third objective is to examine the state-wide and local policies in Oregon that influence the placement and/or redevelopment of MHPs. There is a review of Oregon's land use planning for manufactured housing and an examination of the policy changes Oregon has made in recent decades to slow the closure rate of MHPs. This project will look at policies and manufactured housing availability trends in

Bend, Oregon as a case study.

To analyze the effectiveness of Oregon and Bend's policy changes, public records on Oregon MHPs and lot availability were compiled from 2012 to 2018. Using this data on location, size, and type, and considering changes over the 6 years of available records, I calculated the change in total MHPs, MHPs located in Bend, Oregon, and the average lot densities in MHPs for Oregon and Bend. Using these calculations, I did a simple linear regression to predict the availability of MHPs and lots through 2025 for Oregon and Bend. By doing these simple projections and visualizing the data, I could get an idea of how effective Oregon and Bend's policies have been and if these areas are tending toward the desired improvement in manufactured housing availability.

This project is an effort to lay the groundwork for quantitative work in a future project to research the causal impact that Oregon state and local policies have had on manufactured housing trends among low-income and entry-level homeowners and the empirical consequences of these policy decisions.

Background

Community Attitudes Toward Manufactured Home Parks

In 1960, after living for years in the very early versions of "trailer homes", Ernest Bartley and Frederick Bair Jr. wrote a book with the goal of advocating for good manufactured housing that defied the common societal expectations. They were quick to criticize the MHP owners who operated their parks as slums, calling out their lack of responsibility for maintaining the condition of their properties:

Entirely too many mobile home "parks" aren't worthy of the name.

Dwelling units on wheels march in drab rows, jammed against each

other on small barren lots, immersed in clutter of their own making and surrounded by haphazard mixtures of trade, manufacturing, and commerce. Such places are eyesores. They barely miss (and sometimes do not miss) being public nuisances. (Bartley & Bair 1960)

The pair believed that these types of careless MHP owners, with their blighted parks and slum-lord attitudes toward collecting rent, caused much of the nation's misconceptions about MHP residents and their homes. This image of the sub-standard "trailer park" is one that has persisted in the decades since Bartley and Bair's analysis of the state of MHPs and manufactured homes continued to be pushed into blighted areas of municipalities—"out of sight and where the community leaders feel they would do the least harm to the established inhabitants and their economic and social activities" (Belcher 1974, xiii).

As MHPs have been forced away from general residency areas in the city, the tendency for them to decay increases as they are left unregulated and unseen by city officials and the general public. This decay further damages the reputation of MHPs and has entrenched the idea in the minds of Americans that "trailer parks" are undesirable in a community and are inhabited by those members of the community who are likewise undesirable. Bartley and Bair Jr. point out that "the loudest objections to mobile homes, ... come from people who have never lived in a mobile home, never familiarized themselves with living conditions in a good mobile home park, or have business reasons which they sublimate into spirited defense of the public welfare against the damaging effects of *trailerites*." (Bartley & Bair 1960).

While one might imagine that the 58 years since the publication of their book will have seen a shift in the attitudes toward MHPs and its residents, it has not been the case. MHPs and its residents are still often seen as fringe members of a

community, predisposed to crime, negligence, drug and alcohol use, and poverty. Sometimes a person will connect these ideas when discussing their fears around MHPs, as is seen in this internet forum post from 2011:

We are thinking about taking a job offer in Bend Oregon. We are a young family with 3 children. We visited it in 2006 and the West Side seemed nice however we did notice the most trailer parks we had ever seen anywhere. Now we are hearing that the crime is up from homeless rift raft outside of town. Graffiti and gangs seem to be also taking over. Is it true? (User Jennifer5221 2011)

According to Katherine MacTavish, “although mobile home park residence offers one of the leading sources of unsubsidized low-cost housing in the United States, such residence comes with social costs attached. [...] Exposés draw the rural trailer park as the equivalent of a rural slum; an image the public willingly accepts.” (MacTavish 2007). She draws on statements from interviews to gauge community opinions toward MHP residents, such as “if you live in a trailer park, you’re on welfare, use drugs and are a bad parent—automatically” and “the kids get named as trailer trash.”

MacTavish believes “that a mobile home park and the individuals who reside therein are seen in such negative terms is of great concern, particularly in the context of current socioeconomic changes that are redefining who ‘belongs’ and who does not belong in rural places” (ibid.).

Demographics of Manufactured Housing Use

While the general public maintains an outdated and misinformed idea of who typically resides in MHPs, reality paints a more grounded and modern picture.

Manufactured housing residents on average are older than renters and homeowners in Oregon as a whole (Affordable Housing Need... 2017). In 2017, 35% of the owners of manufactured homes were over the age of 65, compared to just 15% of

renters. Of the inventory of MHPs listed in Bend's 2012 Housing Need Analysis, 4 out of 12 parks were open only to residents over the age of 55 (Manufactured Housing 2016). Aging residents are increasingly seeking manufactured housing as a viable means of homeownership during their later years, as it is seen as affordable, easy to maintain, secure and comfortable.

Among residents of family MHPs, which are open to tenants of any age, there is a higher representation of Latino and Hispanic residents. Latino and Hispanic homeowners comprise 5% of all homeowners in the U.S., but among manufactured housing Latino and Hispanic owners account for 9% (Affordable Housing Need... 2017). Manufactured housing provides a lower barrier to entry for Latino and Hispanic families looking to purchase a home in Oregon, and discriminatory regulations against manufactured housing has a disproportionate impact on this population.

While many see MHP residents as transient, renters, or receiving government housing assistance, the truth is that most people living in manufactured homes own their home. Most able-bodied manufactured home residents are employed and tend to work in areas such as construction, food service, public schooling and crop production. The monthly housing cost for those living in manufactured homes is around \$200 less a month than those renting and about \$650 less when compared to all homeowners. When considering housing cost to income ratios, 42% of manufactured housing is considered affordable versus 21% of all other housing types (Affordable Housing Need... 2017).

History of Manufactured Housing Policy

Overall manufactured housing policy in the U.S. over the last 70 years has largely been discriminatory and restrictive. Municipalities historically have disliked

manufactured housing within their city limits with the belief that they are “threats to real estate values, that they are a blight on the landscape, and that they house those of questionable moral character” (MacTavish 2017). Local governments and fiscally-minded citizens also lambasted MHPs for demanding public and civil services, such as police protection and public schooling, while contributing less in property taxes than traditional single-family homes.

An antagonistic approach to manufactured housing regulation grew in popularity among municipalities from the 1950’s and into the 70’s as the number of MHPs rapidly increased within their communities. Local governments tended to “ignore the mobile home and the mobile home park; to treat the whole business as something which is transitory and may go away if left alone” (Bartley & Bair 1960). While these criticisms were levied against policy makers as early as the late 50’s and into the 60’s, this method of regulating—or, rather, the avoidance of regulating by pushing MHPs out of the cities whenever possible and ignoring the slum-like conditions within MHPs—continued for many years.

By sequestering MHPs into industrial and commercial zones and leaving MHP owners unregulated, local policy makers allowed MHPs to deteriorate and the fear of blighted MHPs become a self-fulfilling prophecy. By the time local governments recognized the need for increased regulation of MHPs, existing MHPs were already in poor condition—they were full of trash, homes were not up to area housing codes, there was not room for creating off-street parking, and the parks had poor access to municipal services such as sewage (Bartley & Bair 1960).

As local governments became more involved in raising the standards of MHPs and their outward appearance, regulations became punitive and discriminatory.

Traditionally, manufactured homes and MHPs were ignored completely when it came to city planning, de facto excluding them from being developed within areas zoned for residential use. Cities started to incorporate manufactured housing and MHPs into their comprehensive plans, which included zoning restrictions “on the use of individual property and [were] established in order to further the welfare of the entire community” (ibid.). The comprehensive plans began to explicitly prevent manufactured homes from existing within residential zones, “or, sometimes, there [was] an attempt to use the zoning power along with other governmental power in an effort to eliminate mobile home parks entirely from a community” (ibid.).

In addition to increased antagonistic regulatory pressure toward MHPs, there was an issue of inconsistency between different municipalities, even within the same states. While one local government might make a great effort to eliminate MHPs from their area, another could choose to ignore the issue and avoid regulation of MHPs. Towns with higher property values faced greater pressures from its residents to keep MHPs out, and so areas with more city resources were also the most likely to exclude MHPs completely. When a new MHP was built, it was often in an already-distressed area that had other MHPs nearby. “From the community standpoint, such inconsistencies tend to put the burden of mobile home development on those communities least able to properly assimilate them” (Belcher 1974).

Manufactured Housing and Policy in Oregon

Starting in the 1970’s, the Oregon legislature began addressing the need for manufactured housing in Oregon by collecting data on manufactured housing and working to pass laws protecting and encouraging the use of manufactured homes as a means of low-income homeownership (Relocatable Housing 1970).

Currently in Oregon there exists 1,067 MHPs with a total of 62,397 lots. Only 3,122 of these lots are labeled as vacant, leaving an estimated 59,275 lots currently occupied with a manufactured home. Of the listed parks, 325 (30.46%) are only open to occupants who are over the age of 55. The other 744 parks (69.54%) are considered family parks with no age restrictions in place (Manufactured Housing Park Directory 2018).

The 2017 Oregon Revised Statutes (ORS) Chapter 197 codifies the overall land use policies that Oregon and its local governments must follow, including statutes that mandate where and how manufactured homes may be placed. The bulk of the statutes that address manufactured housing fall under “Urban Grown Boundaries [UGB] and Needed Housing Within Boundaries” (Or. Rev. Stat. § 197.295 -197.314 2017) and “Mobile Home, Manufactured Dwelling and Recreational Vehicle Parks” (Or. Rev. Stat. § 197.295 -197.314 2017).

The first section focuses on the types of housing that the Oregon legislature has recognized as both necessary and in short supply. The policies under this section attempt to address this issue by: defining *needed housing*; requiring local governments to analyze housing need over the next 20 years and to adopt measures to alter zoning and density to meet that need (Or. Rev. Stat. § 197.296 2017); and limiting the ability of local governments to prohibit or create barriers to the development of needed housing, including manufactured housing (Or. Rev. Stat. § 197.312 2017). This section also mandates that local governments amend their own comprehensive land use plans to allow for manufactured houses within its UGB and prevents local governments from setting tighter restrictions on manufactured houses and placement than those set forth in the ORS (Or. Rev. Stat. § 197.314 2017).

The second section of ORS Chapter 197 is focused specifically on policies for manufactured housing and placement within UGBs, stating “it is the policy of this state to provide for mobile home or manufactured dwelling parks within all urban growth boundaries to allow persons and families a choice of residential settings” (Or. Rev. Stat. § 197.475 2017). This section requires local governments to inventory existing MHPs in their district and project the need for additional MHPs. It also mandates that they “establish clear and objective criteria and standards for the placement and design of mobile home or manufactured dwelling parks” that are not beyond the standards already set in the ORS (Or. Rev. Stat. § 197.480 2017). This section disallows the ability of local governments to ban manufactured homes due to the age of the home if they are to be placed in a higher density residential zone or if the home is being relocated due to a MHP closure (Or. Rev. Stat. § 197.485 2017). In addition, MHPs are no longer allowed to be placed in commercial or industry zones within UGB unless there are no other available options (Or. Rev. Stat. § 197.490 2017). Lastly, this section states that recreational vehicles (RVs) are not to be subject to length-of-occupancy limits provided they are located within MHPs or RV parks and are connected to electrical and sewage systems (Or. Rev. Stat. § 197.493 2017).

Case Study: Bend, Oregon

Bend’s city planners recognize that there has been an increasing need for affordable housing within their UGB. The city has seen rapid population growth, increasing from about 20,000 in 1990 to approximately 80,000 residents in 2014. While housing development also increased at a high rate during this time, most of the new housing was in the form of single-family detached homes.

Between the years 2000 and 2014, Bend saw their home prices more than

double while household income levels increased by only 18 percent, resulting in a decline in housing affordability. The city points to three additional reasons that their housing stock has become less affordable since 1990: “high demand for second homes in Bend; significant growth in the tourism/recreation economy and the associated jobs that tend to pay lower wages; [and] demographic changes” (Chapter 5: Housing 2016). In Bend’s 2013 Housing Needs Analysis, the city estimated that residents in Bend considered Lower-Middle Income or Lower Income (an income range of \$17,910 to \$47,760) would be able to attain existing manufactured housing or attached homes (such as apartments or duplexes). New or existing single-family unattached homes were not considered financially attainable for these segments of its population. These two groups alone accounted for 33% of all households in Bend in 2013 (Exhibit A 2016). Another 17% of households were under this income range and could afford apartment rentals or government assisted housing. According to the 2016 UGB Proposal, “manufactured housing continues to be an affordable housing type for a segment of Bend’ population.”

The demographic changes outlined in Bend’s comprehensive plan are the significant growth of the population over the age of 65, a maturing millennial population, and growth in the number of Hispanic and Latino residents. The city estimates that all three groups will struggle with lower incomes, higher debts, and an increased need for attached and manufactured housing over the next 10 years. Bend forecasts that their population will total 115,000 people by the year 2028, an increase of approximately 35,000 people over the next 10-year span.

Bend’s Manufactured Housing Policies

In the early 2000’s, Bend began making policy changes to address the need for

manufactured housing protections and additional development options within its UGB. They passed the *Mobile Home Park Closure Ordinance* to “[ensure] accommodations for tenants of parks that might be redeveloped, while simultaneously allowing property owners to utilize their property as the desire.” Bend recognized the effect that MHP closures were having on its affordable housing stock and implemented two notable regulations: 1) owners of MHPs are able to redevelop MHPs consistent with the land’s current zoning, provided the owner or developer assists the tenants in moving their manufactured homes to new MHPs (or paying fair-market value for the homes if they are not legal to be moved); 2) MHP owners will be able to zone their MHP at a higher density, from ~7 units per acre to ~21, provided the MHP sets aside a portion of the new lots for families earning less than 30% of Bend median income and for tenants whose homes could not be moved from the park (Housing Data 2012). This ordinance is an example of Bend’s willingness to cooperate with MHP owners and developers to incentivize the continued operation of existing MHPs.

In 2007, Bend implemented Ordinance NS 2048 “to add new text regarding affordable housing and manufactured home parks, [and] add two new policies regarding redevelopment standards for manufactured home parks and density bonuses” (ibid.). This is in line with the requirements of ORS sections 197.296 and 197.314 previously discussed, mandating that local governing bodies build an inventory and projection of needed housing and amend their comprehensive land use plans to allow for manufactured housing within their UGBs.

To satisfy the requirements by the Oregon statutes, Bend took two major steps in its comprehensive plan. They compiled a “buildable lands inventory (BLI) that

catalogues the development status (developed, vacant, etc.) and capacity (housing units) that can be accommodated on lands within the UGB.” In addition, the city conducted a “housing needs analysis (HNA) that includes an analysis of national, state, and local demographic and economic trends, and recommendations for a mix and density of needed housing types” (ibid.). By analyzing local demographic and housing trends, estimating population growth and housing availability, and analyzing housing affordability, their HNA projects the growth of needed housing and the required housing density through 2028.

Bend’s development code allows manufactured homes to be sited in the following zones within its UGB: “Urban Area Reserve (UAR10), Suburban Low Density, Residential (SR 2 ½), Low Density Residential (RL), Standard Density Residential (RS), Medium-10 Density Residential (RM-10), and Medium Density Residential (RM)” (Exhibit A 2016). These zones have a density as small as 1 - 2.5 units per acre (SR 2 ½) to 7.3 – 21.7 units per acre (RM). As mandated by Oregon statutes, Bend does not require manufactured homes or manufactured home parks to be located within commercial or industrial zones, though a couple of MHPs are currently located in commercial zones. In accordance with Oregon statutes and its own 1998 General Plan, Bend added the new zoning opportunities for manufactured home parks at the higher-density range (RM). This change in zoning anticipated the need for 50% higher density for manufactured housing than was seen through the 1990’s (Chapter 5: Housing 1998).

The 1998 General Plan also pointed out a problematic requirement in its previous policies that mandated manufactured homes built in the less urban areas of Bend have individual septic tanks installed. The city recognized that this policy,

along with the lack of sewer services available outside of the city center, limits the number of attached and manufactured housing developed in the more rural areas of town. As a result, Bend's 2016 UGB Proposal reaffirms the goal of the city to expand sewage services to residences within city limits, allowing these new areas to be rezoned at higher residential densities and for manufactured home parks to be developed at a much lower cost (Exhibit A 2016).

Outcomes and Projections

Bend estimates a need for an additional 13,770 housing units between 2014 and 2028 to account for its projected population growth. Though there is an increased demand for manufactured housing, these homes accounted for only 4% of the total housing stock in Bend in 2016 and MHPs continue to close. Historically manufactured homes have made up around 7% of housing stock in Bend, jumping to 9.6% at the 2000 census (Housing Data 2012). Since the early 2000's, manufactured housing as a percentage of all housing stock has fallen in Bend and in Oregon as a whole.

Bend's 2016 HNA states, "Without some form of public investment to encourage continued operation of existing manufactured home parks and construction of new manufactured home parks, this shortage will continue." The city estimates that there will be a need for an additional 690 manufactured housing units if just 5% of their anticipated new single-family households choose to reside in MHPs—"However, development of a new manufactured home park in Bend over the planning period may be unlikely, given the trend towards closing manufactured home parks" (Manufactured Housing 2016).

Oregon's Manufactured Dwelling Park Directory tracks data that suggests Bend

had at least 3 MHPs close between 2012 and 2018. According to *Source Weekly*, a local newspaper, “between 2002 and 2007 Deschutes County led all counties outside the Portland metro area in mobile home park closures - all of which occurred in Bend” (Home Sweet Home 2008). If MHPs in Bend continue to shut down at their increasing rate, by the end of 2025 Bend could lose another 4 MHPs with an estimated loss of 289 manufactured home spots. This is an approximate 25% decline in the total number of manufactured housing spots in Bend.

While Bend’s *Mobile Home Park Closure Ordinance* was enacted to protect tenants in manufactured home parks from experiencing hardship if their MHP closes, it has had some unintended consequences. Tenants fear that MHP owners, faced with the obligation to pay for the relocation costs of homes should they close the park, will raise the lot rents to offset the potential costs. A month after the ordinance was passed a MHP in Bend experienced a lot rent increase of \$65, though the MHP owner stated the increase was unrelated to the ordinance. There is the concern among tenants and advocates that MHP owners looking to close their park will continue to raise lot rents to force tenants to leave on their own accord, avoiding the requirement to pay relocation expenses (*ibid.*).

In addition to concerns about precautionary rent increases, residents stated that they did not believe the compensation would be enough to protect them if the MHP were to close. One resident said she could expect to receive at most \$8,000-\$10,000 from the MHP owner for her home under the ordinance requirements, but that the amount would not cover the costs of relocating or replacing her older manufactured home. One resident complained that “the city should have stuck by its original, temporary ordinance that required park owners to pay the full cost of

relocation plus room and board during the transition” (ibid.).

Discussion

Oregon Outlook

In 2015, the state’s Consolidated Plan concluded that “Oregon’s communities are losing manufactured housing parks over time, with a 25% decrease in the number of manufactured home parks between 2003 and 2010” (State of Oregon Consolidated Plan 2011 to 2015). Using numbers gathered from Oregon’s Manufactured Dwelling Park Directory, U.S. Census data on housing, and data from Oregon’s own housing reports and analysis, I projected the loss in MHPs and manufactured housing lots within the MHPs through 2025.

The bulk of the data was manually pulled from internet archives of the Oregon Park Directory, which went back as far as 2012 (Manufactured Dwelling Park Directory 2018). When available, I selected a data point from Quarter 2 and Quarter 4 of each year and documented the number of MHPs and the total number of lots. I then calculated the average number of lots per MHP to get an estimate of the change in MHP density over time. As expected, the average density of lots within MHPs has increased steadily since 2012, possibly as a result of the policy changes Oregon has implemented regarding zoning and density for MHPs. I also calculated the average change in the total number of lots for each 6-month period. I used the linear equation outcome from a graph of the number of Oregon MHPs over the past 6 years to project the additional loss of MHPs over the next 7 years (see Figure 2).

With these methods I was able to consider both the estimated increase in lot density within MHPs and the estimated decline in the number of MHPs when calculating a projection of the loss of manufactured housing spaces. From the

beginning of 2012 to the end of 2018 there was a documented loss of 47 MHPs and 724 total lots. The resulting projection shows a loss of 99 additional MHPs from 2018 to 2025, with an estimated total of 671 lots lost. Ultimately Oregon could expect a total loss of more than 1,000 manufactured housing lots from 2012 through 2025, a period during which state-level policies were expected to slow or reverse these trends. Both results are shown on Figure 1.

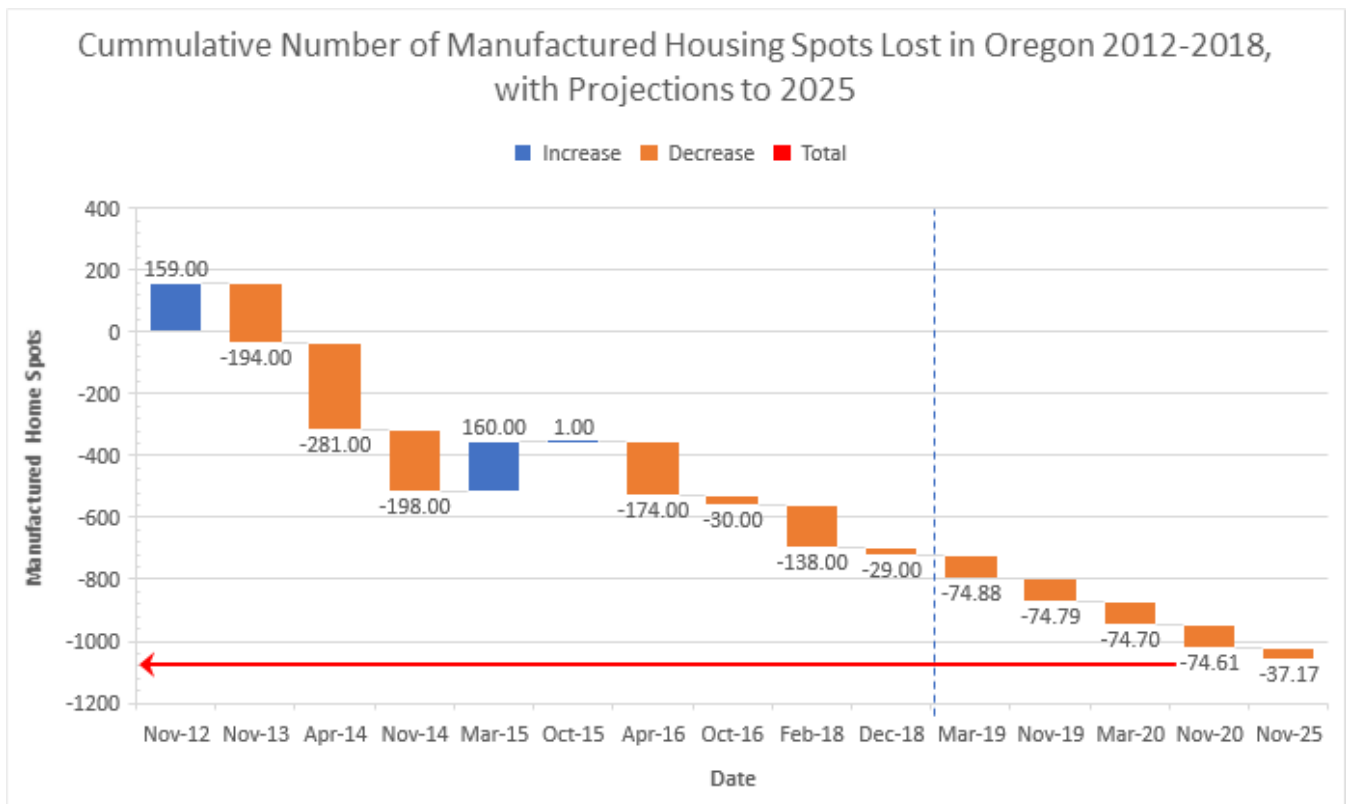


Figure 1 Historic and Projected Loss of Manufactured Housing Spots in Oregon. Katie Bewley. 2018.

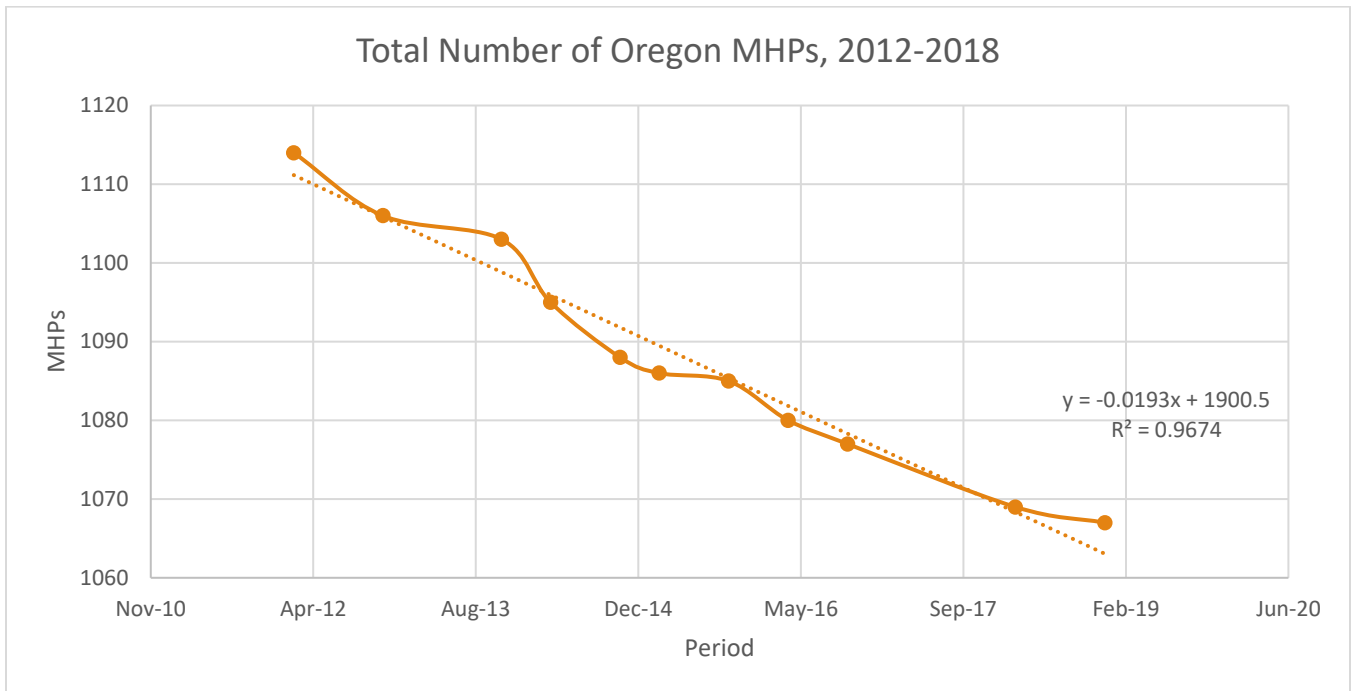


Figure 2 Total Number of Oregon Manufactured Home Parks in Oregon, 2012-2018. Katie Bewley. 2018.

Policy Implication: Resident-Owner Cooperatives

Some MHP residents look to *resident-owner cooperatives* or *resident-owned communities* (ROC) to escape the uncertainty of privately-owned MHPs with the potential for abrupt eviction and redevelopment. In a ROC, residents collectively purchase the MHP from its owner and self-manage the operation, maintenance and infrastructure of the park. Residents contribute their own funds and often look for outside support, such as non-profit housing organizations that provide training and financing, to assist them in the purchase of these multi-million-dollar properties. Oregon considers ROCs “one of the most effective ways of preserving affordable manufactured housing. It also promotes secure tenure and encourages wealth-building and asset appreciation via manufactured home ownership” (Local Agency Toolkit 2016).

In 2013, the Century Drive Mobile Park in Bend, Oregon was purchased by its tenants for \$3.65 million. The seller’s representative stated “They purchased the park

to control their destiny as there is little to no low-income housing available in Bend. [...] We had several offers from developers, all of whom wanted to redevelop the park and remove the residents” (Century Drive 2013). Residents worked with the Community and Shelter Assistance Corporation (CASA) of Oregon, a rural advocacy group, to navigate the purchase of the park. CASA, along with Oregon Housing and Community Services and Banner Bank, also facilitated the purchase of a 100-space MHP in Douglas county in 2015. The MHP required over \$2 million in health and safety improvements, which CASA assisted with by providing technical training, resources, and access to financing (Local Agency Toolkit 2016).

Like CASA of Oregon, other organizations have begun assisting residents and non-profits in financing MHPs. Some non-profit groups, such as Network for Oregon Affordable Housing, work with both ROCs and park purchases by non-profits. Others, such as ROC Capital, focus only on financing resident-owned cooperatives. Government organizations at the federal and state level also have programs in place to assist the development of ROCs. USDA Rural Development, for example, offers loans to low-income, elderly, disabled and rural residents who are attempting to buy or improve MHPs. Without assistance from non-profit and government organizations, residents would likely not qualify for the commercial loans that are required to finance and maintain such large properties.

Conclusion

Oregon has recognized the need for affordable housing protections as wages stagnate, the population grows, and the development of new low-income residential properties slows. It has included measures in its stated housing goals and land use plans that address the need for additional manufactured housing across Oregon. In

addition, it has passed regulations aimed at protecting existing manufactured housing from redevelopment and has policies enacted to force local governments to increase the presence of manufactured housing within their UGBs.

Despite these efforts and the rising demand for manufactured housing, Oregon continues to see MHPs close and projections suggest that manufactured housing will become an increasingly lower share of overall housing over the next 10 years. The policies Oregon has in place do not appear to stand up to the pressures of local redevelopment. There is an increasing need for a quantitative analysis of these policies to measure the true impact, if any, they have had on local manufactured housing markets and MHPs.

Once these policy impacts are measured, it will be possible to reevaluate the programs in place and better understand the successes and failings of such policies as Oregon once again looks for new regulatory methods for solving its housing affordability problems.

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