

MANUFACTURED HOME PARK PRESERVATION PROJECT

AN EQUITY INITIATIVE GRANT PROJECT

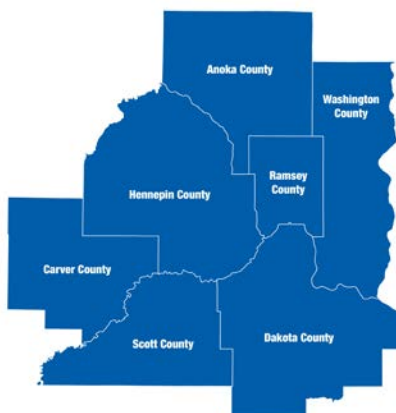


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The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Council operates the regional bus and rail system, collects and treats wastewater, coordinates regional water resources, plans and helps fund regional parks, and administers federal funds that provide housing opportunities for low- and moderate-income individuals and families. The 17-member Council board is appointed by and serves at the pleasure of the governor.

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About This Report

Equity is one of the five outcomes of [*Thrive MSP 2040*](#), the Metropolitan Council's long-term regional plan. It means connecting all of the region's residents to opportunity regardless of their race, ethnicity, income, and ability. With *Thrive MSP 2040*, the Council has committed to using equity as a lens to evaluate its operations, planning, and investments. It has pledged to explore how the Council's resources and core functions can mitigate the place-based dimensions of disparities by race, ethnicity, income, and ability.

As part of its commitment to equity, the Council dedicated \$1 million of its 2015 budget to fund competitive Equity Initiative Grants. The purpose of these grants is to identify and test new ways of advancing equity within the Council and throughout the region. The Council allocated \$250,000 of these grant funds to the Manufactured Home Park Preservation Project, a multi-divisional project involving housing policy, manufactured home park connection to the regional wastewater treatment system, and environmental and water quality considerations. The first part of this two-part project involves the creation of this baseline report, which evaluates the current state of the region's manufactured home parks and examines the policy levers that the Council could use to help preserve them. The second part involves a pilot grant program to defray the costs of connecting one manufactured home park to the regional wastewater treatment system by using a 50/50 match structure (up to \$250,000) to cover assessed regional Sewer Availability Charges (SAC).

This report intends to inform future Council decisions and foster a larger dialogue concerning the importance of manufactured home parks and collective means to preserve them. Manufactured homes are an important source of unsubsidized affordable housing for low-income residents and residents of color (especially Latino residents) in Suburban, Suburban Edge, and Emerging Suburban Edge communities. Surveys show that park closures disproportionately displace households of color. Loss of these parks would undermine equity by disconnecting low-income households and residents of color from the unique opportunities offered by suburban communities.

SECTION 1: Why do Manufactured Home Parks Matter?

Significant Form of Affordable Housing

As stated in *Thrive MSP 2040* and the [2040 Housing Policy Plan](#), the Council is committed to being a good steward of the region's limited housing resources by preserving the region's existing housing stock. Manufactured home parks are an often overlooked source of unsubsidized affordable housing that offer expanded housing choices to low-income residents. For some households, manufactured housing also offers the only realistic opportunity to become homeowners. In 2015, the seven-county region had 14,229 manufactured housing units in 83 parks.¹

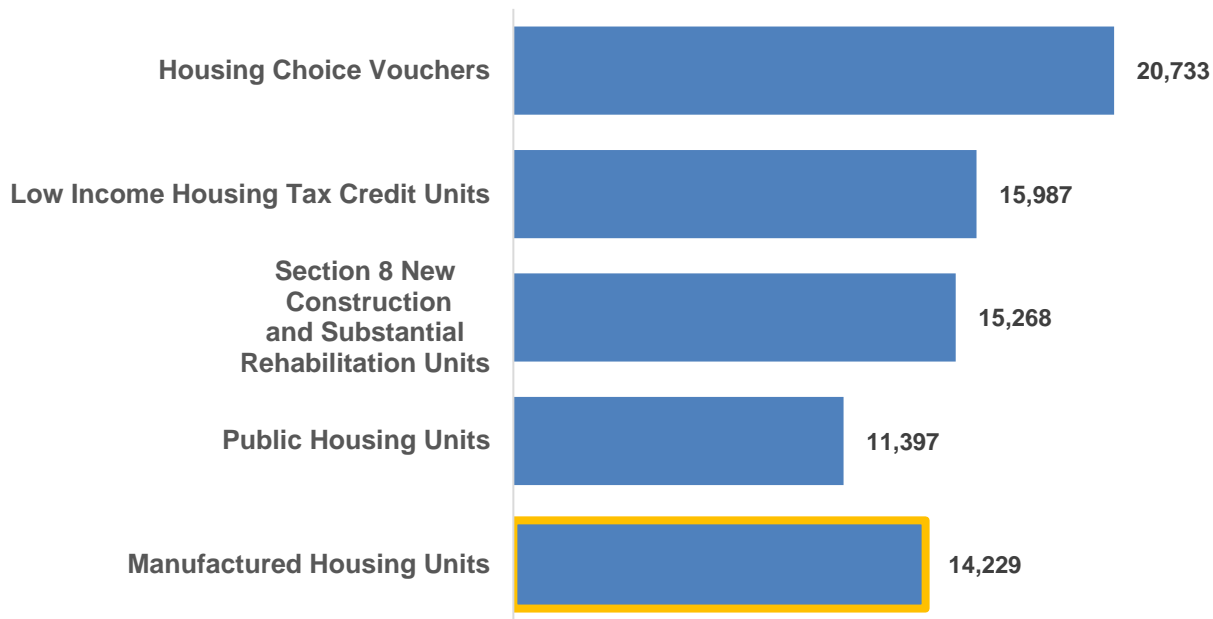
While manufactured housing is generally considered affordable, purchasers often cannot access traditional mortgage financing and may be forced to pay higher interest rates similar to a car loan. This is the case because, in Minnesota, manufactured homes are classified as private property rather than real estate. For many park residents, living in a manufactured home park entails both payments on a mortgage and rental expenses. The region's manufactured homes are located in manufactured home parks where homeowners lease a pad from the park owner to connect to utilities. Park owners can be individuals, many living locally, or larger investor owners, and the cost of leasing space and the quality of operation can vary. In some cases, manufactured home parks have been converted into resident-owned cooperative communities.

Contrary to the perception that most of the manufactured home units are 'mobile,' moving these units from one location to another is sometimes very difficult, if not impossible. In some cases, where the units are fairly old, physically moving them is simply not possible because the structural integrity of the units cannot withstand relocation. In other cases, where moving costs are almost as high as the market value of the unit, it is prohibitively expensive. Often, residents who decide to move just leave their units behind, transferring ownership to park owners for a nominal fee. Due to all of these complications and costs, when parks close, many residents lose their homes rather than relocate to another park.

The preservation of manufactured home parks promotes equity by keeping park residents connected to the opportunities offered by the communities in which the parks are located. It gives residents of the region, regardless of their race, ethnicity, income, and ability, viable housing options to live in communities of their choice. This is especially important in suburban communities where housing diversity is relatively limited.

The Twin Cities region is seriously behind in terms of meeting the affordable housing needs of its residents.² Without significant public resources dedicated to housing, it is especially hard to provide affordable housing to the region's very low- and extremely low-income residents. Given shrinking public resources for affordable housing, manufactured housing units stand out as an especially important source of housing affordable to some of the region's most economically vulnerable residents (See Figure 1). The parks are also an important source of affordable housing for the region's residents with disabilities: 14% of the park residents have disabilities, compared to 9% of the remaining residents of the region.³

Figure 1: Affordable Housing Resources that Serve Very Low-Income and Extremely Low-Income Households



Source: U.S. Department of Housing and Urban Development Picture of Subsidized Households, 2015 and National Housing Preservation Database; Metropolitan Council Manufactured Housing Park Survey.

Since 2000, manufactured home parks have been an increasingly underutilized resource. While the number of pads in the region's parks—park capacity—remained fairly constant, the number of occupied and unoccupied manufactured homes declined noticeably over the last decade and a half. As a result of this trend, the region had 1,408 empty pads and 460 unoccupied manufactured homes in 2015.

A number of factors contributed to these vacancies. During the housing boom, easy access to credit enabled many manufactured home residents to buy 'stick built' homes, reducing the demand for manufactured homes. The financial crisis that followed the housing boom hurt low-income residents of the region especially hard; the resultant job losses may have caused many manufactured home owners to lose their homes. Most of these vacant homes were purchased and moved to North Dakota, where the oil boom created a severe housing shortage. Finally, the limited credit available for the purchase of manufactured homes has made it harder to buy manufactured homes in the region.

This unused manufactured home park capacity presents an opportunity for the region to expand its affordable housing stock. If all of the empty pads had a double-wide home placed on them and a family moved into each unoccupied home, the region could provide affordable housing to 1,164 additional families. If each empty pad had a single-wide home on it and a family rented or owned all of the unoccupied homes, this would mean 1,868 more affordable homes in the region. To put this number in context, in 2014, the region added 777 units that were affordable to households who made 60% or less than the Area Median Income.

A Resource at Risk

Redevelopment pressures, aging infrastructure, and locations near major transportation infrastructures slated for new investments put this valuable source of affordable housing at risk. The threat is real; no new parks have been built since 1991 but ten parks have closed since then.

Redevelopment. In locations where land prices are relatively high, redevelopment pressures often put manufactured home parks out of business. For instance, Collins Mobile Home Park in Bloomington was closed in 1994 to make room for Wal-Mart, Shady Lane Court in Bloomington was bought out by a condo developer in 2006, and Spring Lake Park's Mobile Home Park closed in 2014 as the owners sold the land for redevelopment. Another park in Saint Anthony, Lowry Grove, is currently in the process of closing due to the sale of the property to a developer.

Aging Infrastructure. Aging infrastructure is another significant threat to the region's manufactured home parks. Water and sewer systems that are typically privately owned by park owners require costly repairs as they approach the end of their expected useful life—usually 40 to 50 years. Of the 83 parks that existed in the region in 2015, 90% were at least 40 years old.⁴ This suggests that in the coming decades water and sewer system problems are likely to burden park owners, at times threatening the financial viability of parks across the region. There are already examples of closures due to infrastructure problems. For instance, in 2007, growing local infrastructure problems prompted the Washington County Housing and Redevelopment Authority, the land owner, to close Whispering Oaks in Oakdale for a new mixed-income development. Woodlyn Court in Anoka closed in 2008 because the owners decided that it would be too expensive to repair the park's aging septic system. The Park of Four Seasons in Blaine, the region's largest manufactured home park, has been experiencing problems with its water system, making it vulnerable to closure.

Redevelopment, aging infrastructure, and road improvements put manufactured home parks at risk of closure.

Road Improvement Projects. In some instances, road expansions make manufactured home parks vulnerable to closures since many parks tend to be located along major highways. For instance, the Mounds View Mobile Home Park is currently facing the risk of losing a number of manufactured home units due to right-of-way issues related to the building of a sound barrier along I-35W. Losses in units in Colonial Village, another park along I-35W in Mounds View, may happen due to similar right-of-way issues. Similarly, road improvements projected to take place in Jackson Township at the intersection of Highway 41 and Highway 169 are likely to affect two parks: Jackson Heights Trailer Park and Mobile Manor Court.

Affordable Housing for the Most Economically Disadvantaged

Manufactured home parks are especially important for the region's very low- and extremely low-income residents. Income and poverty levels of park residents show that these parks serve some of the most economically disadvantaged families in the region. The median income for owners of manufactured housing units (\$40,000) is less than half of the median income of the homeowners of the region (\$86,000).⁵ Similarly, 44% of residents are below 185% of federal poverty level, compared to 22% of all residents.⁶

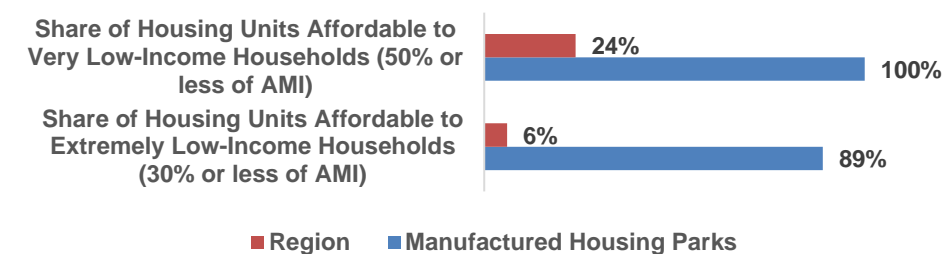
In a region where the affordable housing stock is far from meeting the demand, there is an especially acute shortage of housing units affordable to people with very low- and extremely low-incomes.⁷ Construction of new affordable units typically requires significant public subsidies to make it

economically feasible for developers to build them. Given the overall decline in public resources dedicated to housing production, such subsidies are harder to come by.⁸

Manufactured home parks help ameliorate the shortage of housing affordable to low- and extremely low-income residents and do so without public subsidies. Figure 2 shows that compared to the region's share of housing units that are affordable to people who make 30% and 50% of Area Median Income, a much higher portion of the manufactured housing units are affordable to residents in these income levels. Manufactured home parks are distinctive as a housing option for many economically disadvantaged residents.

Manufactured housing provides an affordable source of housing for very low- and extremely low-income residents and enables homeownership for economically disadvantaged families.

Figure 2: Affordability of Manufactured Housing Units vs Region's Overall Housing Stock



Source: Metropolitan Council Estimates from MetroGIS Regional Parcel Datasets for 2014/2015; U.S. Department of Housing and Urban Development, 2008-2012 Comprehensive Housing Affordability Strategy (CHAS) data; 2009-2013 American Community Survey Public Use Microdata Sample (PUMS) data.

Manufactured housing units also offer homeownership opportunities to families for whom ownership is otherwise difficult or not possible. In fact, the homeownership rate among manufactured home residents (90%) is higher than the rate for the residents who live in other types of homes (74%).⁹ Moreover, as Figure 3 shows, manufactured units house families at costs that are much lower than other types of housing with median monthly housing costs for manufactured home owners only 55% of the median monthly housing costs of homeowners in the region.

Figure 3: Median Monthly Housing Costs



Source: American Housing Survey 2013 data for the 16-County Metropolitan Statistical Area

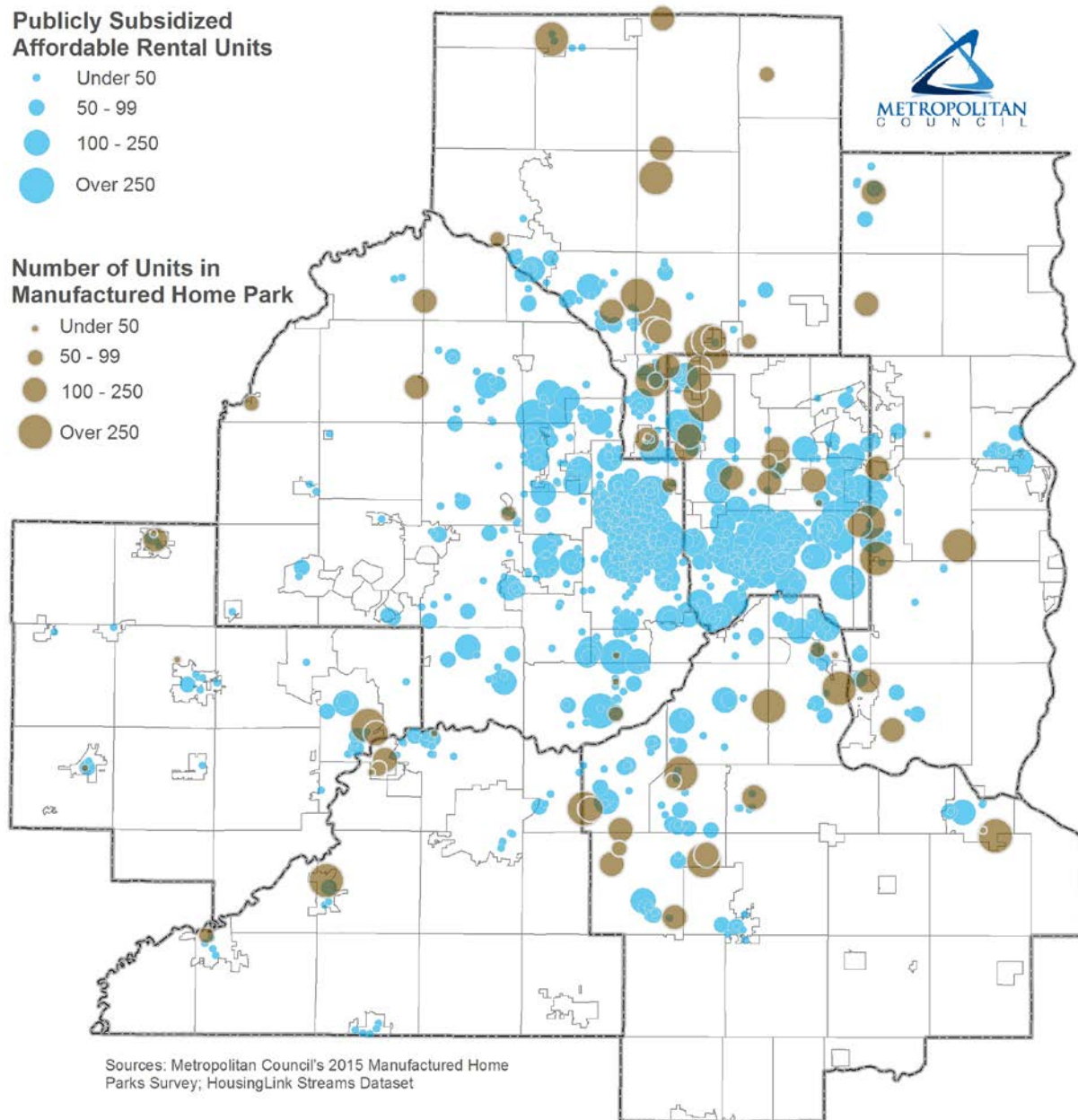
More Housing Choices for Low-Income Residents

As mentioned, preserving manufactured home parks contributes to equitable outcomes by giving low-income residents viable housing options in communities and neighborhoods that they cannot easily access otherwise. The region's parks are primarily located in suburban communities where land prices can be relatively low: 59% of the parks in the region are located in Suburban, Suburban Edge, or Emerging Suburban Edge communities.¹⁰

Manufactured housing units expand the housing choices available to low-income residents, especially in locations where publicly subsidized affordable housing units are scarce.

Overall, these communities offer relatively few publicly subsidized housing options to low-income residents (see Figure 4). In many instances, manufactured housing units constitute a significant portion of the existing affordable housing stock in these communities. Preserving these units is especially important so as not to disconnect low-income residents from the unique set of opportunities these communities offer.

Figure 4: Number of Units in Manufactured Home Parks and Publicly Subsidized Affordable Rental Housing



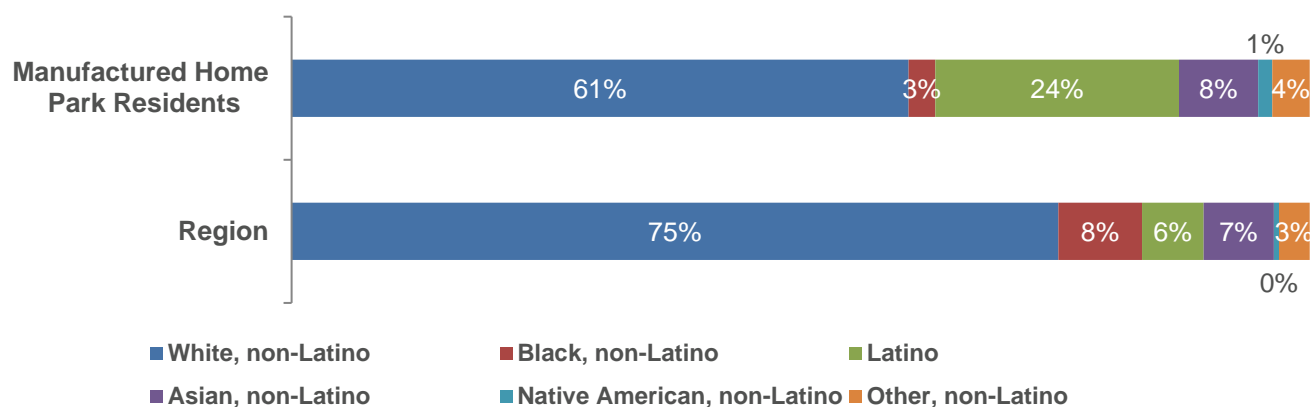
Disproportionate Impact of Park Closures on Residents of Color

Preventing manufactured home park closures is also important from a racial and ethnic equity standpoint. Overall, the region's parks are more racially and ethnically diverse than the region as a whole. Among residents of color, Latinos are specifically overrepresented in the parks. Nearly a quarter (24%) of manufactured home residents are Latino, compared to only 6% in the region (Figure 5). This demographic composition suggests that closure of parks can have a disproportionate impact on residents of color.

In fact, a 2007 survey of park closures in Minnesota showed that these closures disproportionately displaced people of color.¹¹ The survey found that while households of color represented only 10% of the manufactured home park residents in Minnesota, they represented 54% of the residents displaced by park closures. Within the seven-county region, a survey of residents living in two manufactured housing parks—St. Paul Cabins and Shady Lane—showed that 66% of the residents displaced by the closure of these parks were people of color.¹² Similarly, road improvements that are currently in early stages of planning could disproportionately affect Latino residents living in two manufactured home parks—Jackson Heights Park (96% Latino) and Mobile Manor Court (over 50% Latino)—in Jackson Township.¹³

Households of color represented 10% of manufactured home park residents in Minnesota, but they represented 54% of residents displaced by park closures.

Figure 5: Racial and Ethnic Composition of Manufactured Home Park Residents versus the Region

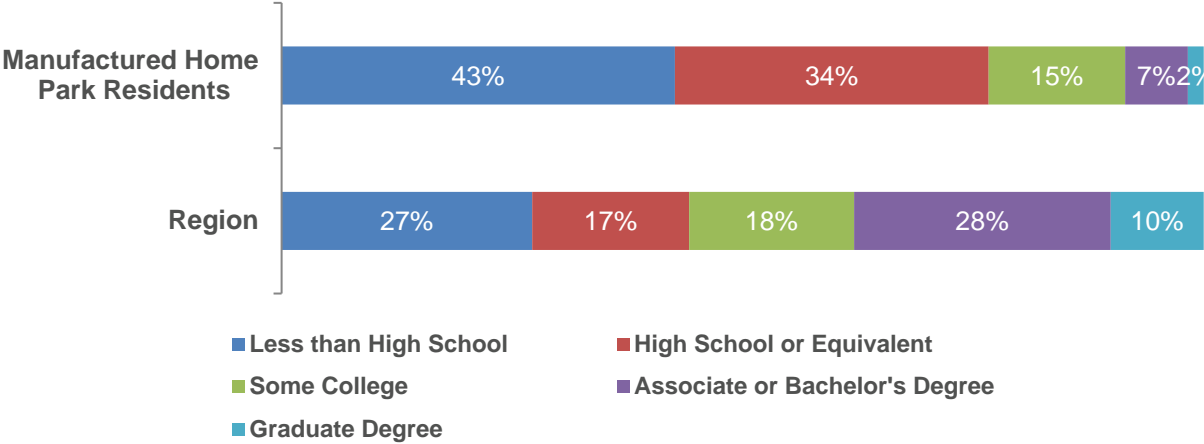


Source: 2010-2014 American Community Survey Public Use Microdata Sample (PUMS) data.

Access to Opportunities—High-Performing Schools

Residents of manufactured home parks have access to a number of opportunities such as high-performing schools. Educational attainment levels of park residents are lower than those of the region's residents. Overall, around three-quarters (76%) of the adult park residents do not have education beyond high school, compared to 45% of residents in the region (Figure 6). School-age residents of the parks, who represent nearly a quarter (23%) of park residents, are well positioned to take advantage of good educational resources that can raise their overall educational attainment levels.¹⁴

Figure 6: Educational Attainment of Manufactured Home Park Residents versus the Region



Source: 2010-2014 American Community Survey Public Use Microdata Sample (PUMS) data.

Manufactured home parks offer affordable housing options in high-performing school districts (see Figure 7). In fact, 87% of the students living in parks live in areas that offer educational opportunities that are above the regional average.¹⁵ Connecting school-age children to high-performing schools helps enhance their social and economic mobility and is crucial for breaking inter-generational poverty and increasing educational attainment. Manufactured home parks are home to 8,400 school-age children.¹⁶ If these children lose access to these educational opportunities, this could erode their chances to have good incomes and jobs in the future and further exacerbate many of the disparities the region currently faces.

Manufactured home parks offer affordable housing in high-performing school districts. Of the 8,400 students living in parks, 87% live in areas which offer educational opportunities that are above the regional average.

Convenient Access to Social Services

Providing social services to low-income suburban residents is challenging mostly because suburban poverty is geographically dispersed. Manufactured home parks provide a unique opportunity for effective social service delivery because a subset of the people who need such services are clustered in a relatively small area. Many nonprofits and even some governmental entities increasingly see the potential of parks for extending social services to low-income people living in suburbs.

Manufactured home parks provide convenient access to social services in suburban areas where service delivery is challenging.

Some parks partner with cities and nonprofits to start community centers that offer a range of social services. Maple Hill Estates, a manufactured home park in the City of Corcoran, is a good example of such civic partnerships. The Maple Hill Estates Hope Center was made possible through Community Development Block Grant resources from the State of Minnesota, funds from the City of Corcoran, donated land from the park owner, as well as staff time from Mobile Hope, a nonprofit service provider. The center currently offers after-school homework help, English as a Second Language classes, food distribution, legal assistance, summer camps for kids, and computers to park residents, about 40% of whom do not otherwise have access to the Internet.

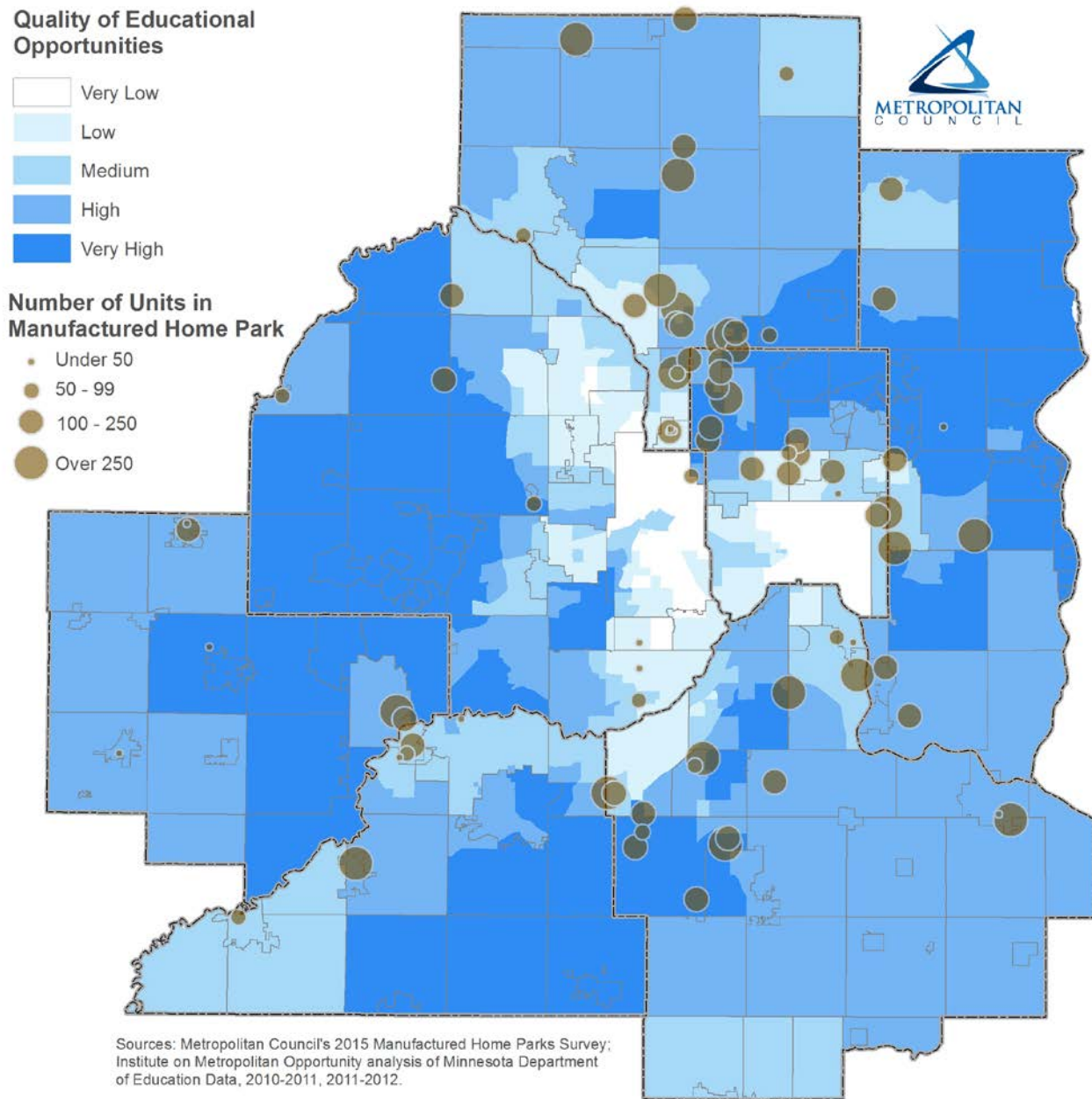
The \$1.2 million Cimarron Youth Center in Cimarron Park—a park located in Lake Elmo—is another example. Family Means, a nonprofit service agency from Stillwater, constructed the youth center, which currently offers children and teen enrichment programs, community and school programs, and homework help. It provides a safe place to socialize for teens and offers healthy snacks. In addition, the center offers counseling and mental health services, financial counseling, caregiver support services, and employee assistance programs to park residents. Cimarron Park also serves as a convenient location for the efficient delivery of some of the services offered by Washington County. For instance, the Washington County WorkForce Center sponsors a teen employment program in the Cimarron Youth Center. Easy access to a host of social services like this can make a big difference in the lives of park residents who might not have otherwise taken advantage of such opportunities.

Access to Jobs

A range of commuting options connect manufactured home parks to job centers in the two central cities and the suburbs. Seventy of the 83 manufactured home parks in the region are within 5 miles of a Job and Activity Center.¹⁷ Many manufactured home parks have rush-hour transit access to employment centers in Saint Paul and Minneapolis. In fact, 70% of the parks are located within one mile of a transit stop.¹⁸ In addition to transit access, car ownership among park residents is very high; 96% of the households living in a park own at least one car while nearly two-thirds (65%) own two or more.¹⁹ Finally, bicycling is another option available to park residents as 93% of the manufactured home parks are within one mile of the Regional Bicycle Transportation Network.²⁰

Seventy percent of manufactured home parks are located within 1 mile of a bus stop.

Figure 7: Quality of Educational Opportunities in Relation to Manufactured Home Parks



Note: School performance is measured by a composite index that combines 3rd grade reading (2011-2012 academic year) and 8th grade math scores (2011-2012 academic year) and high-school graduation rates (2010-2011 academic year). If the index value of a school falls within the top quintile, the school is classified as a very high performance school. In contrast, if the index value of a school falls within the bottom quintile, the school is classified as a very low performance school and so on. For details of how the composite index was calculated, see Metropolitan Council, [Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region](#), Appendix, p. A44.

SECTION 2: Policy Considerations for Manufactured Home Park Preservation

Manufactured home parks promote equity and facilitate good stewardship of the region's resources in a number of ways. They expand the housing choices available to low-income residents, connecting them to opportunities in locations where publicly-subsidized affordable housing units are scarce. They do so in a cost effective way, offering the lowest-cost housing and homeownership options to residents who might otherwise not afford a home. Preserving manufactured home parks is also important from a racial and ethnic equity point of view since park closures tend to disproportionately displace the region's residents of color.

The Council can consider a number of policies to help preserve this valuable yet at-risk source of affordable housing and improve the region's environment and water quality. While the resources that the Council could provide are far from sufficient in ensuring the preservation of all parks in the region, these resources can play a significant role in preventing many park closures especially if part of a public/private partnership. Described below are Council policies that intersect with manufactured housing as well as some potential policy considerations that can help in preserving manufactured housing in the region.

Water Resources Policy Plan—an Integrated Strategy for Water Resources

The Council's [2040 Water Resources Policy Plan](#) (WRPP) is a framework for building strategies that integrate wastewater, water supply, and surface water into a comprehensive water plan. The WRPP's theme is to move further toward integrating planning for wastewater, water supply, and surface water management. The WRPP indicates that the challenges of water supply, water quality issues, and environmental stewardship need strategies that look at the whole water picture and consider how efforts in one area could benefit the others.

An integrated approach moves beyond treating wastewater primarily to meet regulatory compliance to intentionally combine related activities to achieve more effective results, using multiple policy tools to address complex regional challenges and opportunities. In addition, the Council uses a watershed management approach to support sustainable outcomes. The Council's activities supporting watershed assessment and management provide value in a number of ways. These activities include targeting efforts to protect the region's natural environment, protecting and improving recreational opportunities, offsetting impacts of wastewater treatment plant discharges, and protecting drinking water.

Described below are some considerations related to connecting manufactured home parks to the regional wastewater system that would have potential stewardship benefits with improvements to the surrounding environment.

Connecting to the Regional Wastewater System—Sewer Availability Charge

Planning for and facilitating connection to the regional sewer system and treating the region's wastewater are among the Council's most important functions. When individual users of the system connect to the regional infrastructure, the Council assesses a regional Sewer Availability Charge (SAC) representing the *maximum* potential wastewater capacity the system may use on any given day. The regional SAC, which is currently \$2,485 for a residential unit, is a one-time fee charged by the Council to local governments for each new connection or increase in capacity demand of the regional sewer system.

Local governments typically pass the regional SAC fee along with associated local connection fees to the property owners. The Council assesses the SAC fee when a building permit is issued for either a new building or when a connection permit is issued for an existing building connecting to the regional sewer system for the first time. One SAC unit equals 274 gallons of maximum potential daily wastewater flow capacity. The Council charges a single-family residence one SAC unit. Other types of buildings or connections pay a SAC fee based on the estimated equivalent residential unit wastewater capacity need.

Regional SAC is a one-time fee based on 274 gallons of maximum daily wastewater flow capacity. It is currently \$2,485 for a residential unit.

The SAC structure is complex and has been the subject of periodic review. The Council's regional SAC policy currently offers several discounts for multifamily housing that account for differences in water usage, including whether there is a connection to in-unit laundry, garbage disposal, or dishwasher. The discounts range from 20-40%.

Sewer Availability Charge for Manufactured Housing

Policy Consideration

Offer a SAC discount for manufactured home parks based on existing discounts on regional SAC and an evaluation of additional available daily flow data maximums from manufactured home parks.

When connecting manufactured home parks to the regional sewer system, the Council charges the parks a SAC fee based on the number of lots in the park. A manufactured home is charged the full cost of a SAC unit even though it might have lower water usage and smaller building footprint than conventional single family homes. Historically, the Council took into account that manufactured housing units are likely to use less water for a number of reasons. Acknowledging the fact that many manufactured homes did not have in-unit laundry facilities, the Council offered manufactured home parks a 20% discount between 1972 and 1979. The Council eliminated the 20% reduction, however, in 1980 in light of the growing presence of laundry units in manufactured homes. At present manufactured home parks do not receive a discount based on potentially lower water usage.

However, anecdotal evidence suggests that in some parks manufactured housing units currently use lower amounts of water. For instance, in an interview with Council staff, the owner of Maple Hill Estates in Corcoran indicated that the park's daily maximum flow was well below the SAC maximum potential daily flow of 274 gallons for a single family residence. Maple Hill Estates manufactured home park has a private wastewater treatment system. The system has continuous surface discharges, which means that daily flow data are recorded and submitted to the Minnesota Pollution Control Agency (MPCA) as part of the permit requirement. Council staff acquired historic daily records from the MPCA for Maple Hill Estates, which revealed that the park's maximum daily flow was 143 gallons per unit, approximately 48% lower than the 274 gallon maximum used for SAC. The MPCA also provided historic data from five similar manufactured home park treatment systems, which showed a range of variable maximum daily flows, including values both above and below the 274 gallon maximum. In order to determine if manufactured home parks typically have a lower maximum daily flow, additional analysis would need to be completed with a larger sample size.

Sewer Availability Charge Deferral Program

Policy Consideration

Assess the potential of expanding the SAC Deferral Program so that manufactured home parks are eligible to participate in the program.

The Council offers jurisdictions the option of participating in the SAC Deferral Program. The Program offers a deferral of up to 80% of SAC charges to support small business development. Communities are required to pass on the benefits of deferred SAC payments to participating businesses. At present, this program applies to businesses that owe fees for 25 or less SAC units and excludes any residential development. Businesses can defer payments for up to a maximum of 10 years.

Currently, manufactured home parks cannot participate in the program because of the maximum 25 unit threshold and the specific residential exclusion clause. The Council currently charges the same \$2,485 SAC fee for a newly developed residential unit, which costs upwards of \$250,000 on average, and an existing manufactured home unit, which costs anywhere from \$10,000 to \$20,000.²¹ Clearly, this implies a higher impact for manufactured home residents than other residents. The impact of the regional SAC fee would likely lead to potential rent increases for some of the region's most economically vulnerable residents and could also potentially affect the viability of the park.

Revising the SAC deferral program to make manufactured home parks eligible and potentially extending the deferral time could help facilitate park connections to the regional sewer system in a way that alleviates short-term cost burden and helps with the preservation of affordable housing. The potential consideration of a SAC deferral for manufactured housing would follow the existing model for businesses. Such a revision may require review by a future SAC task force.

Other Wastewater Policy, Procedure, and Program Considerations Related to Manufactured Housing

Inflow and Infiltration Grant—an Option for Already Sewered Manufactured Home Parks

Policy Consideration

Continue allowing manufactured housing to be eligible for Inflow and Infiltration grants and to promote the benefits of the Inflow and Infiltration Program.

Older manufactured home parks, sewered and unsewered alike, often need costly repairs for their aging water and sewer systems. In most cases, these systems are privately owned so the financial burden of maintaining these systems falls entirely on park owners, who often pass at least a portion of this burden onto tenants in the form of rent increases. In the case of smaller, independently owned parks, costly repairs can put a strain on the park's financial viability. In the case of larger, investor-owned parks, owners often postpone costly repairs because these parks change ownership frequently. Rather than undertaking expensive infrastructural investments—the costs of which will not be recouped within a 5- to 10-year timeline—investors focus on maximizing profits and cash flow in the short term and then sell the properties before deferred maintenance catches up with them.

Aging water systems often create inflow and infiltration (I/I) problems, which arise when clean water from leaky pipes mixes with wastewater, taking up valuable sewer pipe capacity. This not only limits the treatment capacity that is available for future households in the region but also costs cities money since they are charged by volume. Recognizing that it is more cost effective to reduce or eliminate I/I than build additional infrastructure, the Council created the I/I Surcharge Program. This program provides financial incentives to prevent excessive I/I created by public and private sources from entering into the regional wastewater treatment system. Over the last several years, the State Legislature has provided funding for grants to local municipalities for private property I/I reduction, though in relatively modest amounts (\$1/2 million in 2013 and \$1/2 million in 2014). Future grant funding that could reduce I/I problems is dependent on the State Legislature.

When it comes to the impact of I/I grant funds, even small amounts matter, as demonstrated by the Park Plaza Resident Cooperative effort in Fridley. Assisted by ROC-USA and Northcountry Cooperative Foundation (nonprofit organizations engaged in helping convert parks from owner- or investor-owned to resident-owned communities), homeowners living in Park Plaza voted to pursue collective ownership of the park. This was a complex financial undertaking, which involved numerous funding sources. The \$80,000 I/I grant that the Metropolitan Council extended to the City of Fridley through the Clean Water Legacy Funds was a critical component of this undertaking.

Policy Consideration

Explore investing in a Manufactured Home Park Infrastructure Fund to help improve water quality, reduce inflow and infiltration, and preserve manufactured parks by addressing their capital needs.

Manufactured home parks often have deteriorating sewer and water infrastructures. Park owners privately own and maintain their parks' infrastructure. Since the owners pay for the cost of maintenance privately, the park's infrastructure often does not benefit from the same level of upkeep and investments that municipal governments provide. Substandard infrastructure can create a number of problems that have a collective impact on the region's water resources, such as poor water quality and inflow and infiltration problems.

Addressing on-site infrastructure issues is not only important for residents, ecology, and reducing inflow and infiltration but because it directly impacts efforts to preserve parks, especially when combined with a lack of connection to a municipal or regional wastewater treatment systems. As a senior Minnesota Housing underwriter put it, even mission-oriented financiers who are interested in park preservation "want to see the hook-ups" in addition to attention paid to capital needs. In other words, if capital repairs have been deferred and an on-site treatment facility is in use, the low-cost financing necessary to address these is unlikely to be made available, fueling the potential of park closure and redevelopment. As a steward of the region's water resources and the direct bearer of the costs of inflow and infiltration problems, the Council has an interest in finding solutions to this infrastructure problem as well as preserving this valuable source of affordable housing in the region.

Over the last five months, a number of state agencies, such as Minnesota Housing and the Metropolitan Council, and nonprofit organizations, such as Minnesota Housing Partnership, Family Housing Fund, Greater Minnesota Housing Fund, have had a series of conversations concerning possible means to create a dedicated infrastructure fund that could provide low-cost financing to cover the cost of infrastructure repairs. As part of the ongoing conversations, the group is also working to identify potential sources of funds and looking into how these funds would be administered.

Policy Consideration

Continue collaborating with agency partners like Minnesota Housing on preserving manufactured housing.

The preservation of manufactured home parks is difficult. Unlike other forms of affordable housing, manufactured housing and manufactured home parks do not have dedicated programs. The question then becomes whether to develop new and specialized products or programs, such as the Infrastructure Fund described above, or try to fit manufactured home and park transactions into existing programs and using more ‘mainstream’ funding sources. Through the work of this grant and as part of the research conducted for this report, Council staff has consulted with key agency partners such as Minnesota Housing and the Minnesota Pollution Control Agency. These conversations made it clear that the uniqueness of this housing type and ownership model requires a collaborative preservation strategy that involves shared knowledge, resources, and risk.

Housing Policy and the Livable Communities Act (LCA) Programs

The Council's *2040 Housing Policy Plan* (HPP) presents strategies that advance the Metropolitan Council's overall housing policy priority—to create housing options that give people in all stages of life and of all economic means viable choices for safe, stable and affordable homes. The preservation of existing affordable housing is a vital and cost-effective component of accommodating both current and future need for affordable housing in the region. Among the Council roles identified in the *2040 Housing Policy Plan*, two are especially relevant to manufactured home parks: providing technical assistance and tools to local governments for preserving affordable housing and acknowledging programs that maintain or preserve unsubsidized affordable housing through Housing Performance Scores. Each community's Housing Performance Score includes the volume of manufactured housing as a component of community affordability, and the methodology provides significant points for park preservation. The Council also takes into account each community's Housing Performance Score when distributing Livable Communities Act (LCA) grants and in ranking transportation projects in the Regional Solicitation process.

Livable Communities Act

Policy Consideration

Explore and communicate eligible activities that manufactured home parks could include in a successful LCA grant application.

The Livable Communities Act (LCA), passed in 1995, is the Council's primary vehicle for investments in housing and in particular, affordable housing. The LCA programs include the Livable Communities Demonstration Account (LCDA), the Tax Base Revitalization Account (TBRA), and the Local Housing Incentives Account (LHIA). Creating incentives for all participating communities to include a full range of housing choices through preservation, rehabilitation, and new construction is a key component of the LCA programs. Of the 51 communities that have manufactured housing parks in their jurisdictions, 40 participate in the LCA program. As participants, they are well positioned to take advantage of these funds by implementing innovative strategies for park preservation and improvement.

The Local Housing Incentives Account program is the most relevant LCA program for the preservation of manufactured home parks. This program funds the expansion and preservation of affordable housing for owners and renters. A competitive LHIA project preserves existing affordable housing and increases homeownership opportunities for the region's workforce and underserved populations, has strong implementation partnerships, identifies leveraged resources, and demonstrates readiness. Projects that aim to preserve manufactured home parks would clearly fulfill the intent of LHIA grants.

In the past, the Council awarded LHIA funds to a manufactured home park as an affordable housing option. In 2008, the Council granted \$100,000 to the City of Lexington, which partnered with the Anoka County Community Action Program to assist up to 20 low- and moderate-income families. The City contributed \$75,000 in Community Development Block Grant funds to match the LHIA grant and the local Housing and Redevelopment Authority provided an additional \$25,000. The LHIA funds were allocated (but ultimately not executed) to acquire up to 6 new manufactured homes.²²

The LCDA is another LCA program that could potentially be used for serving manufactured home parks. For instance, LCDA dollars could potentially be applicable for an innovative manufactured home park expansion. The LCDA program funds innovative development and redevelopment projects that efficiently link housing, jobs, services, and transit. The programs supports projects that demonstrate a variety of housing densities and promote environmentally sensitive development and compact land use. Successful LCDA projects catalyze developments that use land and infrastructure efficiently and support vibrant, diverse communities.

Metropolitan Land Planning Act

Policy Consideration

Encourage comprehensive plan updates to include discussion of manufactured housing and associated preservation policies.

The Metropolitan Land Planning Act (MLPA) requires communities to submit an updated comprehensive plan to the Metropolitan Council for review every 10 years. The Act requires that these comprehensive plans include a housing element, which needs to acknowledge the community's share of the region's affordable housing need and specify implementation tools and programs that the community will use to promote opportunities to address its share of the region's housing need. Currently, the minimum requirements for the housing element of the comprehensive plan updates do not include specific information on manufactured home parks. Jurisdictions can choose to address manufactured home communities in their housing elements at their discretion.

The Council can encourage communities to include in their comprehensive plan updates a discussion of manufactured home parks and their specific plans to preserve them. It can do so by offering technical assistance and additional information in the [Local Planning Handbook](#). For instance, the Council could develop specific information on manufactured home parks for the Local Planning Handbook, including fact sheets and additional materials on how the parks contribute to addressing the affordable housing needs of communities. The Handbook could also provide information on best practices and approaches to improve existing parks and discuss available funding tools for their preservation. It could additionally offer plan examples or sample text from the comprehensive plans of communities that have thorough discussions of manufactured home parks in the housing element of their plan updates.

Manufactured Home Park Preservation Pilot

Policy Consideration

Consider the expansion of the Manufactured Home Park Preservation Pilot and offer other incentives to help manufactured home parks connect to regional system.

The second part of the Manufactured Home Park Preservation grant includes a 50/50 match on the regional SAC fee for one manufactured home park that can connect to the regional system within a few years. Currently, there are three parks that have local infrastructure in place for potential connection within this time frame. The communities in which these parks are located are eligible to apply for the SAC match. The scoring criteria strongly relies on the park's readiness with additional scoring criteria for equity components such as rent protections for residents, park preservation and improvement/revitalization efforts, and programs that connect residents to opportunity.

Across the region, there are 1,376 units in six unsewered manufactured home parks, many of which are anticipated to connect to the regional wastewater system by 2030. If the pilot program was expanded to provide a similar 50/50 SAC match to these parks, it could potentially preserve affordable housing, improve the local environment, and maximize infrastructure resources. The regional SAC fee for these 1,376 units would be approximately \$3.67 million (in today's dollars). If there was a 50/50 SAC match, the maximum cost to the Council of expanding the pilot to the remaining unsewered parks in the region would be approximately \$1.8 million. There are other manufactured home parks in the region that are outside the long-term sewer service area and currently not anticipated to connect to the regional wastewater treatment system.

Connecting manufactured parks to the regional wastewater treatment system is an expensive process, in which the regional SAC fee is only one of the costs incurred. Other connection costs include decommissioning expenses for the existing private treatment system, one-time local sewer and water availability charges, and on-site infrastructure repair costs. In research for this report, staff spoke with local officials, park owners, and manufactured home park advocacy organizations who described costs ranging from \$150,000 to \$200,000 for decommissioning, potential related infrastructure charges of \$200,000 to \$700,000, and local SAC and water availability charges (WAC) ranging from \$1,000 to \$6,000 per unit, all in addition to the Council's SAC. For a 250-unit park, these costs conservatively approach \$1 million or more.

Owners of parks pay for these expenses either by exhausting capital reserves or through loans, the costs of which are spread over multiple years. As these costs reduce the park owners' profits, they pass at least some of the financial burden to tenants in the form of rent increases. Depending on the terms of the loan or the time needed to replenish reserves, the rent burden for tenants can be quite onerous. Recouping these expenses through reasonable rent increases may prove difficult in cases where the loans need to be paid back within a five to ten year period—the typical timeframe investors are willing to commit to manufactured home park investments. Faced with either burdening the residents with large, unsustainable rent increases or bearing the brunt themselves, park owners may see closure and sale of the park for another competing land use as the most viable option.

In an ideal situation, owners would plan for connecting to the regional system. In some cases, connecting the park can be accomplished without adding to the costs residents pay for rent and in most cases their mortgage. When costs imply a choice between continued operation and significant rent increases, however, a strong case can be made for public intervention. Yet, such public investments

should be conditioned on a public return on the investment, be it in the form park improvements, caps on lot rent increases, and/or a commitment to continue to operate as a manufactured home park for a specified period of time.

SECTION 3: Manufactured Housing Park Profiles

This Manufactured Home Park Preservation Pilot includes a 50/50 match on the regional SAC fee for one manufactured home park that could connect to the regional system in the near future. Currently, there are three parks that have the needed local infrastructure in place for potential future connection. This section presents detailed profiles of the three eligible parks: Maple Hill Estates in Corcoran, Cimarron Park in Lake Elmo, and Village Green North in East Bethel.

Corcoran: Maple Hill Estates

Located in Corcoran, Maple Hill Estates is the second largest manufactured home park in Hennepin County. The park, which offers 189 lots for homes, has 180 manufactured homes, 9 of which are currently unoccupied.²³ None of the units in the park are rentals.

These units are an important source of affordable housing to low-income residents and residents of color in the area. In the city of Corcoran, 12% of the housing stock is affordable to families who make 50% or less of the Area Median Income, and manufactured housing units constitute 78% of the city's affordable housing stock at this income level.²⁴

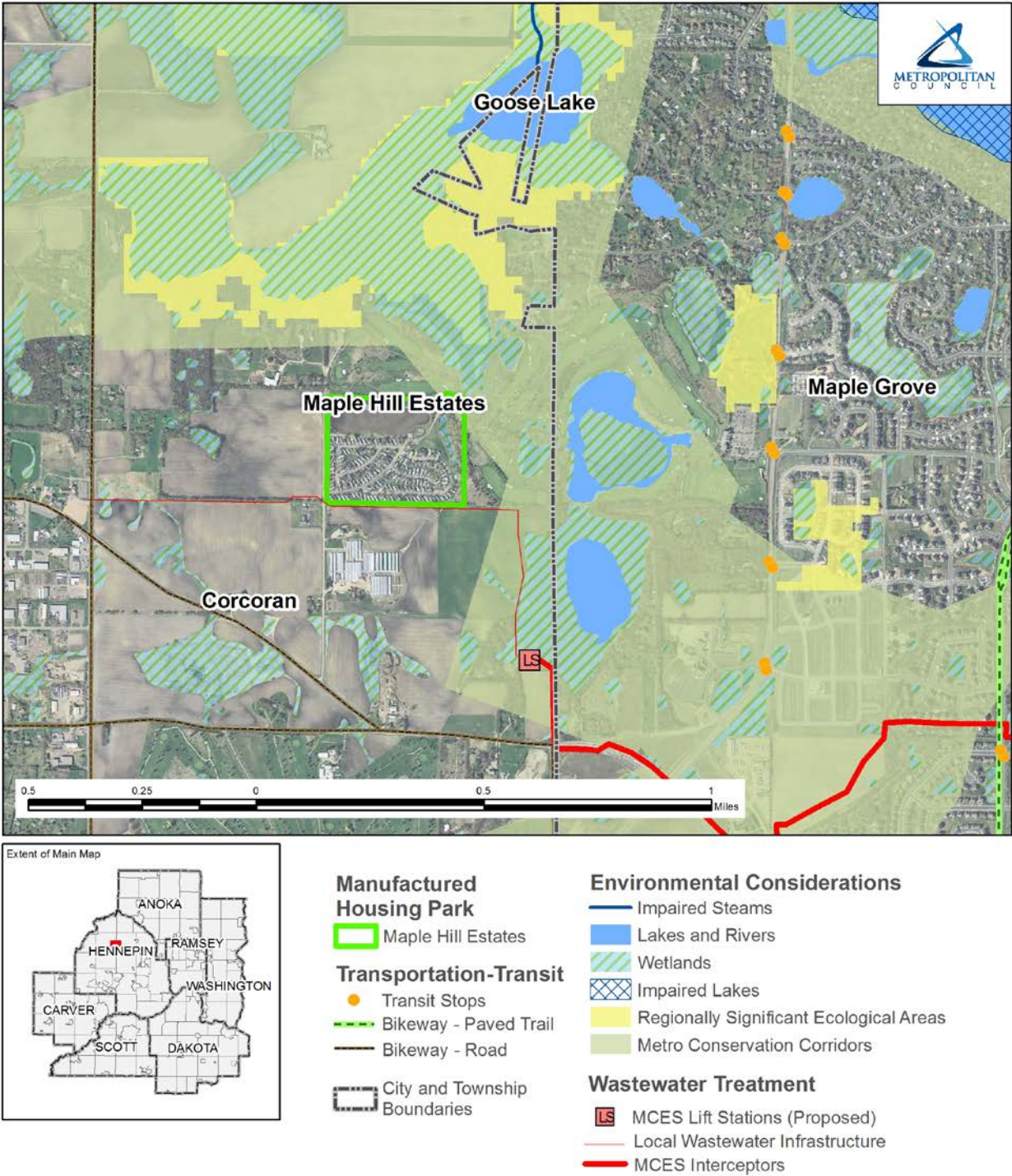
Racially, ethnically, and linguistically, the population of Maple Hill Estates is far more diverse than the overall population of Corcoran. Residents of color make up 40% of the park, compared to 8% in Corcoran.²⁵ While the share of Latino residents in Corcoran is 3%, the share for the park is 23%. Of the park's residents, 69% speak English, 21% speak Spanish and 8% speak Lao.²⁶ The park is home to 117 school-age children, 80% of whom attend the Rockford School District.

Maple Hill Estates is seven miles away from the Arbor Lakes job center in Maple Grove. It is 0.8 mile away from a bus stop on Maple Grove Transit's Route 783, which provides one-way transit service to and from Minneapolis during weekday morning and evening rush hours. The park is also located four miles away from the Fish Lake Regional Park.

Located in Corcoran, an Emerging Suburban Edge community by *Thrive MSP 2040* designation, Maple Hill Estates has a net residential density of 6.3 units per acre. This area is guided Medium Density Residential (6-8 units per acre) in Corcoran's 2030 Comprehensive Plan. The City currently charges a SAC fee of \$1,061 for single family and \$849 for multi-family dwellings in addition to the Council's fee of \$2,485.

Hay Holding Company privately owns and maintains the water and sewer infrastructure of the park, including an on-site septic facility. The facility discharges effluent to a Department of Natural Resources (DNR) wetland complex, which is less than ¼ mile away from the park. This wetland complex has been designated a high-quality Regionally Significant Ecological Area by the DNR and the Council. Elimination of effluent flow into the wetland complex would reduce phosphorus levels in this complex and improve water transparency in Goose Lake.

Figure 8: Maple Hill Estates



Lake Elmo: Cimarron Park

Cimarron Park is the fourth largest manufactured housing park in the seven-county area. The park has 505 lots and 428 manufactured homes, only 12 of which are unoccupied. Only 9% of these homes (39) are rental properties. In Lake Elmo, 19% of the housing stock is affordable to families who make 50% or less of the Area Median Income. Manufactured housing units located in Cimarron Park constitute 77% of Lake Elmo's affordable housing stock.

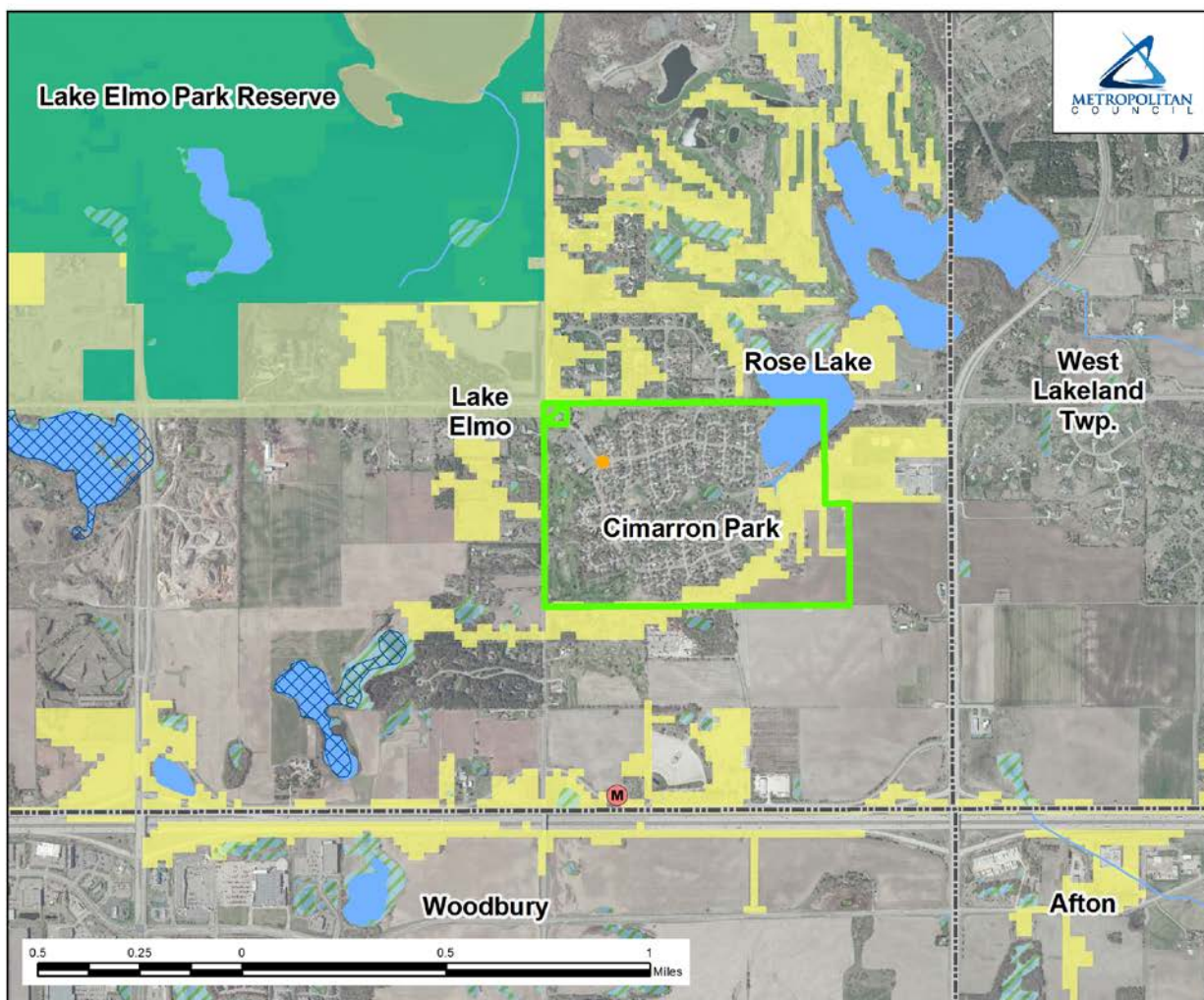
The park is more racially diverse than the rest of Lake Elmo. In Lake Elmo, white and Latino residents constitute 90% and 3% of the population, respectively. In comparison, white residents represent around 80% of the park population while Latinos make up around 10% of park residents.²⁷ In fact, Latino residents of the park add up to roughly 44% of the city's Latino population.

Cimarron Park is four miles away from a job center located at the intersection of I-94 and Radio Drive in Woodbury. Residents can also access jobs in downtown Saint Paul by taking the Express Bus 294 during rush hours, through the nearest park-and-ride facility which is 2.8 miles from the park. Cimarron Park is two miles away from the Lake Elmo Regional Park Reserve. Home to nearly 300 school-age children, the park is located in the Stillwater School District.

The City of Lake Elmo, an Emerging Suburban Edge community, considers Cimarron Park “an important alternative housing resource” that needs to be preserved through intentional efforts. The City reserved 500 SAC units of regional sewer capacity to serve the park when it embarks on major improvements to the City's wastewater treatment system. These improvements are likely to be needed between 2015 and 2030. The City designates the park as an area with Urban Medium Density (4.5-7 units per acre) in its future land use plan.²⁸ Currently, the park has a net residential density of over 4.5 units per acre.

In 2015, the City's local SAC charge was \$3,000 per unit in addition to the Council's SAC of \$2,485. The park's wastewater treatment facility currently discharges into Rose Lake. The water quality of the lake has been significantly compromised as a result of decades of phosphorus effluent discharge. Future water quality is unlikely to improve even if the park's wastewater treatment facility ceases to discharge into it.

Figure 9: Cimarron Park



Manufactured Housing Park

 Cimarron Park MHP

Transit

● Transit Stops

Wastewater Treatment

M MCES Meter

 City and Township Boundaries

Environmental Considerations

— River or Stream

 Lakes and Rivers

 Wetlands

 Impaired Lakes

 Regionally Significant Ecological Areas

 Metro Conservation Corridors

Recreation Park

 Lake Elmo Regional Park Reserve

East Bethel: Village Green North

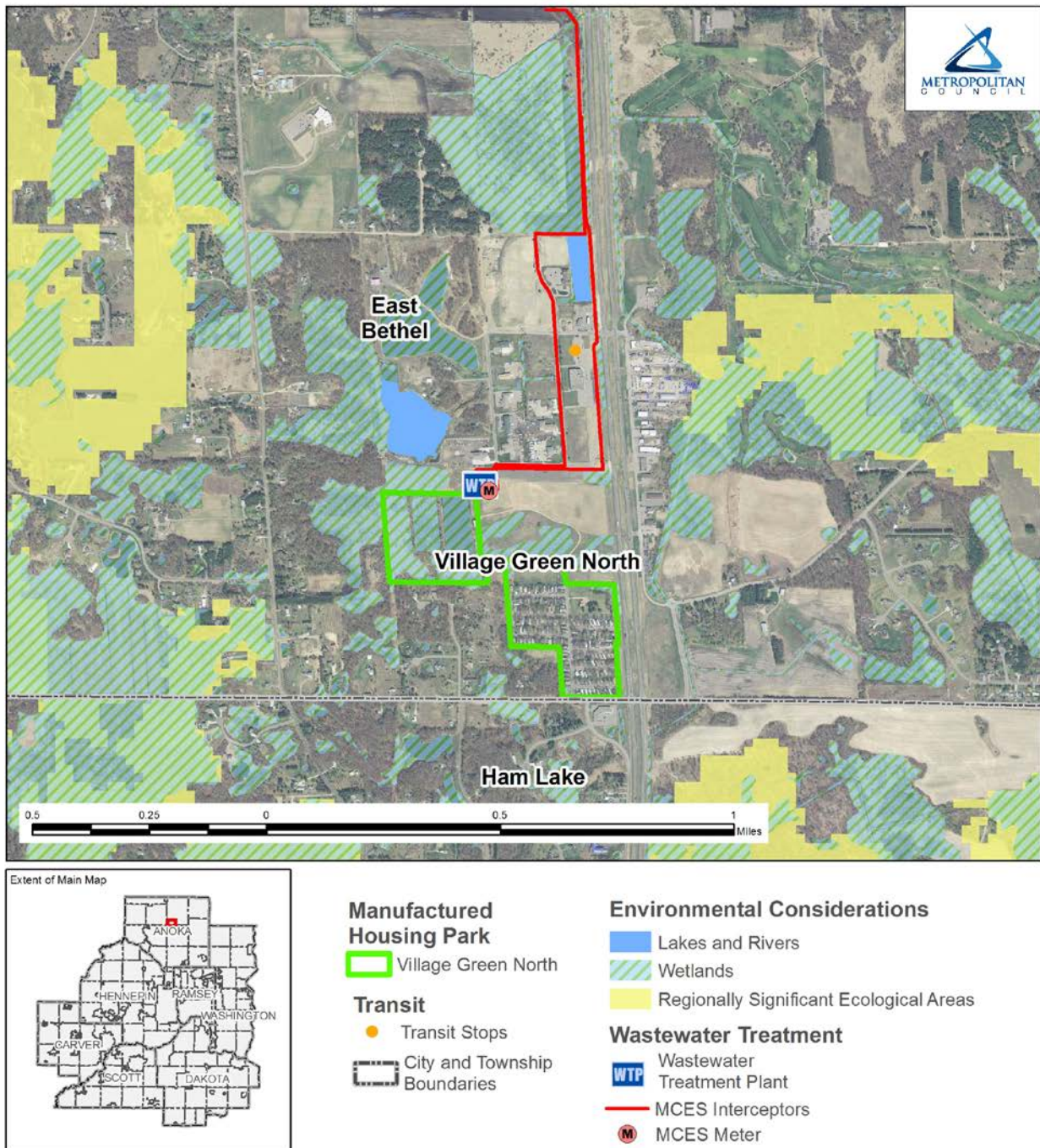
Village Green North is a mid-sized manufactured home park in East Bethel. At a capacity of 174 lots, the park is currently home to 134 manufactured housing units, 5 of which are unoccupied. The park has no rental units. In East Bethel, 14% of the housing stock is affordable to families who make 50% or less of the Area Median Income. Manufactured housing units constitute 42% of this affordable housing stock.

Village Green North is 8.5 miles from a job center at the intersection of Highway 10 and County Road 14 in Maple Grove. The park is located 1.3 miles away from the East Bethel Theater park-and-ride station, where residents can catch the Express Bus 865 to downtown Minneapolis during rush hours. It is also 8.5 miles from the Bunker Hills Regional Park. Residents of Village Green North live within the attendance area of the St. Francis School District.

Located in East Bethel, a community designated as Rural Center, Village Green North has a net residential density of 4.4 units per acre. East Bethel's 2030 Comprehensive Plan Updates designate the area Medium Density Residential (4-6 units per acre). In its latest comprehensive plan, the City anticipates the Village Green North treatment facility to be connected to municipal services before 2030. In fact, the connection to the regional wastewater treatment system was expected to take place between 2010 and 2020; however, implementation has not yet begun.

The City currently charges a SAC fee of \$2,000 in addition to the Council's SAC fee of \$3,185. The facility is located in the Crooked Brook Sub-Watershed, which is on the Minnesota Pollution Control Agency's Impaired Waters list. Connecting the facility to the regional sewer system could be expected to result in incrementally small but long-term improvements in the water quality in Crooked Brook and Cedar Creek.

Figure 10: Village Green North



SECTION 4: Impact of the Manufactured Home Park Preservation Pilot

This project embraces the two important principles of *Thrive MSP 2040*: integration and collaboration. Integration is the intentional combining of related activities to achieve more effective results, leveraging multiple policy tools to address complex regional challenges and opportunities. Collaboration recognizes that shared efforts advance our region most effectively toward shared outcomes.

The project moves beyond organizational silos within the Council and coordinates the efforts of multiple work units within the organization. At the core of the project is a key collaboration between the Community Development and the Environmental Services divisions. The project team, which includes Sector Representative Freya Thamman, Housing Policy Analyst Jonathan Stanley, and Senior Researcher Baris Gumus-Dawes, met with Environmental Services Manager Kyle Colvin on a regular basis. Along with the project team, Mr. Colvin was present in the meetings Council staff had with the owners of manufactured home parks and the staff of the three cities that are potentially eligible for the pilot project.

The team proactively reached out to staff in several work units within the Community Development division. For instance, project staff met with the Livable Communities Act (LCA) manager Paul Burns to discuss whether manufactured home preservation might be a possible LCA-eligible activity and, if so, under what conditions. The project team also met with environmental engineer Jim Larsen several times to discuss the environmental and water quality benefits of connecting the three manufactured home parks to the regional wastewater treatment system. In addition, the team had discussions with Local Planning Assistance and Regional Policy and Research staff to examine how to incorporate a discussion of manufactured housing into the Local Planning Handbook and Comprehensive Plan Updates.

Manufactured home park preservation is a crucial and complex regional issue that the Council alone cannot tackle. Addressing park preservation at a regional scale goes beyond the capacity or authority of any single jurisdiction or institution and requires the streamlined collaboration of a number of stakeholders. This project raised the profile of park preservation within regional affordable housing discussions. It catalyzed interest and further conversations among key regional actors about addressing the multifaceted challenges that parks face at a regional scale. For instance, the project drew interest from the Corporation for Enterprise Development (CFED), a national 501(c) (3) organization dedicated to empowering low-income homeowners to build assets, wealth and human capital. CFED invited Council staff to make presentations in the national I'M HOME Conference which focused on manufactured home parks.

Following presentations by Jonathan Stanley and Regional Policy and Research Manager Libby Starling, project staff participated in a special event concerning policies relating to manufactured housing in Minnesota. Hosted by Northcountry Cooperative Foundation (NCF) and ROC-USA, the event convened multiple stakeholders. Participants of this event included local and federal agencies (Minnesota Housing, the Metropolitan Council, and the U.S. Department of Agriculture), local funders (McKnight Foundation, the Family Housing Fund (FHF), and the Greater Minnesota Housing Fund (GMHF)), national and local advocacy organizations (Corporation for Enterprise Development (CFED), Minnesota Housing Partnership (MHP), All Parks Alliance for Change (APAC), Housing Justice Center), and legislative representatives.

The conference and this special event generated further conversations among regional stakeholders and project staff helped convene a group of interested parties. Jonathan Stanley and Environmental

Services Manager Kyle Colvin met with various housing finance and advocacy organizations to discuss the deteriorated state of private manufactured home park water and sewer infrastructure that undermines investments in park preservation. The conversation included directors and staff from Minnesota Housing; a number of local nonprofit organizations such as MHP, FHF, GMHF, Southwest Minnesota Housing Partnership, NCF and the nationally-operating ROC-USA; planners and service providers from Scott County and northwest Minnesota. Collectively, the group discussed possible legislative approaches to the manufactured home park infrastructure issue, explored existing and possible future programs and resources that can improve infrastructure problems in order to assist park preservation at the regional scale.

Staff have remained active as the issue of manufactured home park closures has come to the forefront at regional and state level conversations. For example, staff from Regional Policy and Research, Local Planning Assistance, and Environmental Services participated in discussions in Scott County, where planned transportation improvements would likely affect two parks located in Jackson Township. These discussions, which involved the Scott County CDA, Scott County Health, Minnesota Housing, and others, addressed issues related to the preservation and improvement of these parks.

More recently, staff was invited to an “emergency” meeting to discuss the impending closure of Lowry Grove in Saint Anthony. Home to approximately 100 families, many of Latino descent, the park is situated near I-35W, local retail services, and a variety of jobs. Organized by the Center for Urban and Regional Affairs (CURA) at the University of Minnesota, the meeting included representatives from NCF, CURA, Minnesota Housing, the Council, Hennepin County, and six park residents struggling to preserve their homes. The park is likely to be redeveloped if residents can’t raise \$1 million in earnest money (approximately one-sixth of the purchase price) in less than 45 days (the time period under state law where residents have a right of first refusal). The discussion revealed the financial difficulties of keeping the park open and participants explored strategies to mitigate the damaging impacts of displacement and loss of community.

Staff has also been in dialogue with NCF leadership to discuss a pilot effort stemming from the recently released “Duty to Serve” rule. Currently, the lack of traditional mortgage products and of a viable secondary market hamper opportunities for both manufactured home buyers and for purchasers of manufactured home parks interested in park improvement and preservation. The “Duty to Serve” rule, promulgated by the Federal Housing Finance Agency, aims to address this issue and instructs Fannie Mae and Freddie Mac to expand their services to manufactured parks along with other types of affordable housing that face this issue.

Project staff will also present the findings of this project at the 30th Annual Minnesota Policy Conference in October 2016. The Conference typically includes 250–300 people from government agencies, academic institutions, nonprofit and for-profit organizations involved in policy, program evaluation, public affairs, and research. Conference organizers dedicated an entire session to this project. The session will once again bring the regional challenges faced by manufactured home parks to the spotlight, giving policy makers another opportunity to focus on collectively addressing these challenges.

SECTION 5: Next Steps

Notice of Funding Availability

The Council intends to release The Manufactured Home Park Preservation Project 50/50 SAC Match Notice of Funding Availability (NOFA) as the next step in this two-part project. There have been meetings with city staff and available manufactured home park owners in each of the three eligible communities to discuss the Manufactured Home Park Preservation Pilot and the upcoming NOFA. Criteria for the NOFA will evaluate readiness to connect, equity criteria, and manufactured home park best practices.

Program Evaluation

Project Lessons Learned will be included in the final report of the Manufactured Home Park Preservation Project after the grant has been awarded.

¹ Metropolitan Council Manufactured Home Parks Survey, 2015.

² Metropolitan Council, [2040 Housing Policy Plan](#), 2015, p. 17.

³ 2010-2014 American Community Survey Public Use Microdata Sample (PUMS) data.

⁴ Metropolitan Council, Manufactured Home Parks Survey, 2015.

⁵ 2010-2014 American Community Survey Public Use Microdata Sample (PUMS) data.

⁶ 2010-2014 American Community Survey Public Use Microdata Sample (PUMS) data. Typically, poverty is measured at 100% of the federal poverty threshold. However, this is an unrealistically low measure of poverty for the Twin Cities given the region's relatively high median income. This report uses 185% of the federal poverty threshold as its measure of poverty. For a justification of this definition of poverty, see Metropolitan Council, [Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region](#), Appendix, p. A36.

⁷ Disproportionately high cost-burden rates for very low- and extremely low-income residents suggests disproportionate shortages. Metropolitan Council, "Falling Further Behind: 2014 Affordable Housing Production in the Twin Cities Region," *MetroStats*, December 2015, p. 5.

⁸ Metropolitan Council, [2040 Housing Policy Plan](#), 2015, p. 18.

⁹ 2010-2014 American Community Survey Public Use Microdata Sample (PUMS) data.

¹⁰ For a definition of these community designations, see [Thrive MSP 2040](#), pp. 92-110.

¹¹ All Parks Alliance for Change, "Racial Disparities in Manufactured Home Parks: Latinos' Experiences in Minnesota," April 2007, p. 6.

¹² Ned Moore, "Wave of Metro Area Park Closing Robs Hundreds of their Homes," *The Alliance*, vol. 27, no. 1 (Winter 2007), All Parks Alliance for Change.

¹³ Metropolitan Council staff calculations based on the U.S. Census Bureau 2010 Census data and the Council's Generalized Land Use Inventory 2010. The racial and ethnic breakdown of Mobile Manor is a close approximation rather than an exact distribution. Demographic data is available at the census block level; yet, park boundaries and the census blocks do not align perfectly. Some of the census blocks that include Mobile Manor have a few housing units outside these parks. As a result, the demographic data doesn't exactly reflect the demographics of this manufactured home park. The number of units outside Mobile Manor, however, is small enough to make this approximation reasonable.

¹⁴ 2009-2013 American Community Survey Public Use Microdata Sample (PUMS) data.

¹⁵ School performance is measured by a composite index that combines 3rd grade reading (2011-2012 academic year) and 8th grade math scores (2011-2012 academic year) and high-school graduation rates (2010-2011 academic year). If the index value of a school falls within the top quintile, the school is classified as a very high performance school. In contrast, if the index value of a school falls within the bottom quintile, the school is classified as a very low performance school and so on. For details of how the composite index was calculated,

see Metropolitan Council, *Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region*, Appendix, p. A44. The regional average is simply the average of each census tract's composite index value for all the census tracts in the seven-county region.

¹⁶ 2010-2014 American Community Survey Public Use Microdata Sample (PUMS) data.

¹⁷ The Job and Activity Centers describe contiguous areas where there are at least 1,000 jobs and the employment density is at least 10 jobs per net acre. The definition also includes some regionally significant manufacturing and distribution centers that have at least 1,000 jobs but densities less than 10 jobs per acre.

¹⁸ Metropolitan Council staff calculations based on Metro Transit HASTUS dataset.

¹⁹ 2010-2014 American Community Survey Public Use Microdata Sample (PUMS) data.

²⁰ Metropolitan Council staff calculations based on the Regional Bicycle Transportation Network.

²¹ Metrostudy News January 22, 2016, available at <http://www.metrostudy.com/twin-cities-housing-4q15-strong-growth-in-new-home-starts-at-year-end-in-spite-of-continued-rising-prices/> Generalized information on the price of used manufactured home units is not available. The information provided here is a proxy and is based on the Housing Section of the St Anthony 2030 Comprehensive Plan Update. This seems to be consistent with current information posted on craigslist.org.

²² While the grant was approved, the funds were not dispensed and the grant was not executed for a number of reasons beyond the scope of this discussion.

²³ Metropolitan Council 2015 Manufactured Housing Park Survey.

²⁴ Council Staff analysis of the 2008-2012 Comprehensive Housing Affordability (CHAS) data from the U.S. Department of Housing and Urban Development and the MetroGIS Parcel Datasets for 2014 and 2015.

²⁵ Center for Urban and Regional Affairs, "Maple Hill Estates: Community Center Survey Results," University of Minnesota, 2011 and the U.S. Census Bureau 2010 Decennial Census.

²⁶ Center for Urban and Regional Affairs, "Maple Hill Estates: Community Center Survey Results," University of Minnesota, 2011 and the U.S. Census Bureau 2010 Decennial Census.

²⁷ Metropolitan Council staff calculations based on the U.S. Census Bureau 2010 Census data and the Council's Generalized Land Use Inventory 2010. The racial and ethnic breakdown of the park is a close approximation rather than an exact distribution. Demographic data is available at the census block level; yet, park boundaries and the census blocks do not align perfectly. In Lake Elmo, one of the census blocks that includes the manufactured housing park has a few housing units outside the park. As a result, the block-level demographic data doesn't exactly reflect the demographics of the park. The number of units outside the park, however, is small enough to make this approximation reasonable.

²⁸ Lake Elmo Village Land Use Plan Comprehensive Plan Amendment, Metropolitan Council Review File Number 20599-5, Table 3-B.



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