



September 19, 2016

To | **HB 4079 Rulemaking Advisory Committee**
CC | **Dan Eisenbeis, Gordon Howard and Carrie MacLaren**
From | **Bob Parker, Rebecca Lewis & Andrew Martin**
SUBJECT | **MANUFACTURED DWELLINGS AND MANUFACTURED DWELLING PARK TRENDS**

The University of Oregon is conducting research to support the rulemaking process mandated by House Bill (HB) 4079. HB 4079 directs the Land Conservation and Development Commission to establish a pilot program in which local governments may site and develop affordable housing. Task 2 of our work program includes gathering information of manufactured dwellings and manufactured dwelling parks.

This memorandum focuses on two provisions of HB 4079:

SECTION 5. (1) The Land Conservation and Development Commission shall, by rule: (b) Specify types of affordable housing allowed on pilot project sites, including sites that are used as manufactured dwelling parks;

SECTION 5. (2) The commission shall specify by rule related requirements for affordable housing that may include a sales price or rental rate range, taking into consideration: (c) The need for sites to accommodate manufactured dwellings, as defined in ORS 446.003, due to the conversion of manufactured dwelling parks or mobile home parks in the region to other uses;

This memorandum starts with a definition of manufactured dwellings and a summary of the relevant statutory framework. According to the U.S. Census Bureau's Characteristics of Housing survey, about 65,000 manufactured homes were built annually in the U.S. between 2007 and 2015. Between 66% and 75% of the units are located on private property (e.g., on individual lots). Forty percent of units built were single-wide, and about 60% double-wide. The Census does not report statistics on triple-wide units. About 80% of manufactured units are titled and taxed as personal property.

The average size of new manufactured homes nationwide was 1,500 square feet between 2007 and 2015. The data vary less than 100 square feet from year-to-year. With respect to value, the Census statistics only present the value of the unit independent of land. According to the Census, in 2015, the average sales price of new manufactured homes in Oregon was \$80,300. The average for double-wide units was reported at \$80,600 and the average for single-wide units was \$50,200.

According to the U.S. Census and American Community Survey (ACS), mobile home/trailer units are decreasing as a share of housing in Oregon. In 1990, mobile homes/trailers accounted for 11.2% of all housing (133,721 of 1,193,567 units). By 2014, mobile homes/trailers accounted for 8.3% of all housing (139,459 of 1,685,814 units). In short, while the number of mobile homes/trailers increased modestly, the share of housing decreased by 3%. Closure of manufactured home parks likely contributed to this trend.

DEFINITIONS AND STATUTORY FRAMEWORK

The State of Oregon identifies manufactured dwellings as a statutorily needed housing type in Oregon Revised Statutes (ORS) 197.303. The necessity of manufactured dwellings is further elaborated in ORS 197.475:

The Legislative Assembly declares that 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.

Because of the need for this type of housing, the state has established a number of definitions and statutes regarding the manufacture, sale, and siting of these types of units. With a few exceptions, cities must consider manufactured housing when updating comprehensive plans and reviewing urban growth boundaries. More specifically, ORS 197.303(c) and (d) defines manufactured home parks and manufactured homes on individual lots as a needed housing type:

197.303 “Needed housing” defined. (1) As used in ORS 197.307, “needed housing” means housing types determined to meet the need shown for housing within an urban growth boundary at particular price ranges and rent levels, including at least the following housing types:

(c) Mobile home or manufactured dwelling parks as provided in ORS 197.475 to 197.490;

(d) Manufactured homes on individual lots planned and zoned for single-family residential use that are in addition to lots within designated manufactured dwelling subdivisions;

In summary, the state statutorily requires communities to plan for manufactured housing as a needed housing type. Moreover, ORS 197.312 explicitly prohibits cities from prohibiting manufactured homes by charter:

197.312 Limitation on city and county authority to prohibit certain kinds of housing; zoning requirements for farmworker housing; real estate sales office. (1) A city or county may not by charter prohibit from all residential zones attached or detached single-family housing, multifamily housing for both owner and renter occupancy or manufactured homes.

Finally, ORS 197.314 establishes required siting criteria for manufactured homes. ORS 197.314(1) requires cities to allow manufactured dwellings on lots in all low-density single family zones (with certain exceptions):

197.314 Required siting of manufactured homes; minimum lot size; approval standards. (1) Notwithstanding ORS 197.296, 197.298, 197.299, 197.301, 197.302, 197.303, 197.307, 197.312 and 197.313, within urban growth boundaries each city and county shall amend its comprehensive plan and land use regulations for all land zoned for single-family residential uses to allow for siting of manufactured homes as defined in ORS 446.003. A local government may only subject the siting of a manufactured home allowed under this section to regulation as set forth in ORS 197.307 (8).

(2) Cities and counties shall adopt and amend comprehensive plans and land use regulations under subsection (1) of this section according to the provisions of ORS 197.610 to 197.651.

(3) Subsection (1) of this section does not apply to any area designated in an acknowledged comprehensive plan or land use regulation as a historic district or residential land immediately adjacent to a historic landmark.

(4) Manufactured homes on individual lots zoned for single-family residential use in subsection (1) of this section shall be in addition to manufactured homes on lots within designated manufactured dwelling subdivisions.

(5) Within any residential zone inside an urban growth boundary where a manufactured dwelling park is otherwise allowed, a city or county shall not adopt, by charter or ordinance, a minimum lot size for a manufactured dwelling park that is larger than one acre.

(6) A city or county may adopt the following standards for the approval of manufactured homes located in manufactured dwelling parks that are smaller than three acres:

(a) The manufactured home shall have a pitched roof, except that no standard shall require a slope of greater than a nominal three feet in height for each 12 feet in width.

(b) The manufactured home shall have exterior siding and roofing that, in color, material and appearance, is similar to the exterior siding and roofing material commonly used on residential dwellings within the community or that is comparable to the predominant materials used on surrounding dwellings as determined by the local permit approval authority.

The policy framework makes clear that the State supports development of manufactured housing and perceives it as a type of housing that local governments should allow and plan for.

Definitions of Manufactured Dwellings

Manufactured dwelling, as defined in ORS 446.003, includes a residential trailer, mobile home, or manufactured home. ORS 446.003 defines these terms as:

(24)(a) Manufactured home, except as provided in paragraph (b) of this subsection, means a structure constructed for movement on the public highways that has sleeping, cooking and plumbing facilities, that is intended for human occupancy, that is being used for residential purposes and that was constructed in accordance with federal manufactured housing construction and safety standards and regulations in effect at the time of construction.

(29) Mobile home means a structure constructed for movement on the public highways that has sleeping, cooking and plumbing facilities, that is intended for human occupancy, that is being used for residential purposes and that was constructed between January 1, 1962, and June 15, 1976, and met the construction requirements of Oregon mobile home law in effect at the time of construction.

(34) Residential trailer means a structure constructed for movement on the public highways that has sleeping, cooking and plumbing facilities, that is intended for human occupancy, that is being used for residential purposes and that was constructed before January 1, 1962.

The primary difference between these dwelling types and a recreational vehicle (RV) is that they are intended to be permanent, rather than seasonal or occasional dwellings. Regardless of whether or not they have a motor, recreational vehicles are not designed to the same standards as manufactured dwellings. Manufactured homes are subject to stricter federal standards for construction and safety than RVs. Any manufactured dwelling in Oregon must comply with applicable safety and construction standards at the time when it was constructed.

The U.S. Census/ACS does not have a specific definition for manufactured homes. It has a housing type called “mobile home or trailers,” which are defined as follows:

As collected by the American Housing Survey, a manufactured/mobile home is defined as a housing unit that was originally constructed to be towed on its own chassis (also called HUD Code homes). It may be built in one or more sections. Since the sections are attached side-by-side at the home site, the number of sections determines the size of the final home. Size, therefore, is measured as the number of sections “wide.” A unit composed of two sections is a double-wide; three sections is a triple-wide, etc. Single-wide units come from the factory as one section. It also may have permanent rooms attached at its present site or other structural modifications. The term does not include prefabricated buildings, modular homes, travel campers, boats, or self-propelled vehicles like motor homes. Some people use the terms trailer or manufactured housing in the same sense as mobile homes. Manufactured/mobile homes, however, are not the same as modular/panelized homes.¹

The U.S. Census and Oregon definitions are comparable. While the Census may refer to these units as mobile homes, the units that are described are the same as manufactured dwellings.

Manufactured Dwelling and Mobile Home Parks

Manufactured dwellings are often sited together in mobile home or manufactured dwelling parks. ORS 446.003 defines manufactured dwelling parks as:

(23) Manufactured dwelling park means any place where four or more manufactured dwellings are located within 500 feet of one another on a lot, tract or parcel of land under the same ownership, the primary purpose of which is to rent or lease space or keep space for rent or lease to any person for a charge or fee paid or to be paid for the rental or lease or use of facilities or to offer space free in connection with securing the trade or patronage of such person.

(30) Mobile home park means any place where four or more manufactured structures are located within 500 feet of one another on a lot, tract or parcel of land under the same ownership, the primary purpose of which is to rent space or keep space for rent to

¹ https://www.census.gov/glossary/#term_Manufacturedmobilehomes

any person for a charge or fee paid or to be paid for the rental or use of facilities or to offer space free in connection with securing the trade or patronage of such person.

Subdivisions of parcels with a single manufactured dwelling do not meet this definition. Manufactured dwelling parks are subject to rules regulating the standards of the environment they must maintain. These regulations cover the physical siting (e.g. they cannot be built on unsuitable land), minimum space allocations, and provision of utilities, among others.

According to data collected by the Oregon Department of Housing and Community Services, many manufactured dwelling parks have closed in recent years. To alleviate some of the burden on park residents, the Oregon State Legislature passed a law in 2007 mandating notice and compensation to residents of parks closing due to redevelopment pressures. ORS 90.645 mandates that if a park closes due to conversion to another land use, unless by eminent domain, landlords must provide written notice of at least one year and provide compensation based on the type of manufactured dwelling. Tax credits are available to families who are forced to relocate due to park closures.

Manufactured Dwellings on Lots

Oregon has specific requirements for cities to plan for manufactured dwellings on individual lots. In many respects, these are treated like site-built single family detached dwellings, but the statutes allow cities to adopt standards specific to manufactured dwellings. ORS 197.307(8) provides the specific statutory guidance:

197.307 Effect of need for certain housing in urban growth areas; approval standards for certain residential development; placement standards for approval of manufactured dwellings. (1) The availability of affordable, decent, safe and sanitary housing opportunities for persons of lower, middle and fixed income, including housing for farmworkers, is a matter of statewide concern.

(8) In accordance with subsection (4) of this section and ORS 197.314, a jurisdiction may adopt any or all of the following placement standards, or any less restrictive standard, for the approval of manufactured homes located outside mobile home parks:

(a) The manufactured home shall be multisectional and enclose a space of not less than 1,000 square feet.

(b) The manufactured home shall be placed on an excavated and back-filled foundation and enclosed at the perimeter such that the manufactured home is located not more than 12 inches above grade.

(c) The manufactured home shall have a pitched roof, except that no standard shall require a slope of greater than a nominal three feet in height for each 12 feet in width.

(d) The manufactured home shall have exterior siding and roofing which in color, material and appearance is similar to the exterior siding and roofing material commonly used on residential dwellings within the community or which is comparable to the predominant materials used on surrounding dwellings as determined by the local permit approval authority.

(e) The manufactured home shall be certified by the manufacturer to have an exterior thermal envelope meeting performance standards which reduce levels

equivalent to the performance standards required of single-family dwellings constructed under the state building code as defined in ORS 455.010.

(f) The manufactured home shall have a garage or carport constructed of like materials. A jurisdiction may require an attached or detached garage in lieu of a carport where such is consistent with the predominant construction of immediately surrounding dwellings.

(g) In addition to the provisions in paragraphs (a) to (f) of this subsection, a city or county may subject a manufactured home and the lot upon which it is sited to any development standard, architectural requirement and minimum size requirement to which a conventional single-family residential dwelling on the same lot would be subject.

Our interpretation is that the intent of these standards is twofold: (1) to provide a clear pathway for development of manufactured homes on lots; and (2) to ensure that manufactured homes on lots are compatible with transitional site build single-family dwellings.

INVENTORY

ORS 446.543 Section 2(c) requires Oregon Housing and Community Services (OHCS) to maintain a database of open manufactured dwelling parks and the number of spaces they contain. OHCS also maintains a list of park closures. We identified trends for this housing type using data from the American Community Survey (ACS) and data obtained from OHCS.

Number of Households Living in Mobile Homes

The American Community Survey reports that for 2008-2012, almost 140,000 or 8.4% of Oregonian households reported living in mobile homes. This includes residents in manufactured dwelling parks, as defined above, and units that are on privately owned parcels. This housing type is more prevalent in certain regions of the state (Eastern Oregon, South Central Oregon, and Southwestern Oregon), as well as certain counties within those regions.

The Eastern Oregon and South Central Oregon regions have the highest proportion of residents living in mobile homes. Table 1 shows the proportion of households that live in mobile homes by region. The Portland Metro Region was included to show the disparity between that region and the rest of the state. Portland Metro is the only region below the state average for share of residents living in mobile homes.

Table 1. Number and Percent of Households in Mobile Homes in 2000 and 2008-2012

Region	Total Households 2000	Total Households 2008-2012	Change in Households	HH in Mobile Homes 2000	HH in Mobile Homes 2008-2012	Change in HH in Mobile Homes	% HH in Mobile Homes 2000	% HH in Mobile Homes 2008-2012
Central Oregon	71,166	100,050	28,884	11,927	11,314	-613	16.8%	11.3%
Eastern Oregon	75,512	80,398	4,886	14,714	13,510	-1,204	19.5%	16.8%
Gorge	19,404	21,610	2,206	3,612	3,017	-595	18.6%	14.0%
North Coast	53,163	60,539	7,376	6,701	6,110	-591	12.6%	10.1%
Portland Metro	604,428	693,511	89,083	24,412	22,149	-2,263	4.0%	3.2%
South Central Oregon	32,882	37,150	4,268	6,765	6,493	-272	20.6%	17.5%
Southwestern Oregon	192,913	220,682	27,769	35,178	33,979	-1,199	18.2%	15.4%
Willamette Valley	403,241	459,653	56,412	46,423	43,196	-3,227	11.5%	9.4%
Total	1,452,709	1,673,593	220,884	149,732	139,768	-9,964	10.3%	8.4%

Source: 2000 Census and American Community Survey 2008-2012

All regions saw a decline in both the proportion of households in mobile homes and the absolute number of those households. The decline in absolute number of mobile homes was greater in some areas than others. The Willamette Valley lost over 3,000 households in mobile homes (approximately 7% of the total number), while South Central Oregon lost fewer than 300 (approximately 4% of the total).

Perhaps more important in explaining the relative decline in households living in mobile homes is the overall growth of households in many regions. Between 2000 and 2008-2012, the number of households in Central Oregon grew by over 40%. Despite this enormous growth there was still a decline in the number of households living in mobile homes. Similar, but less dramatic, trends in overall growth occurred in most regions. The growth of households in all other housing types coupled with declines in mobile home households is greatly reducing the overall percentage of households in mobile homes. Nevertheless, mobile homes continue to make up a significant portion of the housing stock outside of the Portland Metro region.

The disparities between counties, even within regions, is much greater than that between regions. For instance, in the Gorge region, the ACS reports 8.2% of households in Hood River County reside in mobile homes, while in Sherman County, 28.2% of households reside in mobile homes. Several other counties have nearly twice the proportion of residents in mobile homes compared to their region, particularly in the Eastern and South Central regions. Appendix A has a complete listing of households in mobile homes by region and county.

Manufactured Park Closings

Despite the importance of this housing type for many Oregonians, 72 manufactured dwelling parks comprising 2,761 spaces have closed since the year 2000. Table 2 shows a breakdown by region of the current number of spaces in manufactured dwelling parks. Table 3 shows the number of park closures, spaces lost, and the percent of spaces that have been lost since 2000.

Table 2: Number of Spaces in Manufactured Dwelling Parks, by Region, 2016

Region	Number of Open Parks	Number of Current Spaces	Average Spaces per Park
Central	61	3,244	53
Eastern	98	4,213	43
Gorge	27	1,140	42
North Coast	62	2,343	38
Portland Metro	248	15,740	63
South Central	47	1,859	40
Southwestern	286	14,362	50
Willamette Valley	358	22,567	63
Total	1,187	65,468	55

Source: OHCS

Table 3: Number of Park Closures Between 2000 and 2016

Region	Number of Park Closures since 2000	Number of Lost Spaces	% of Spaces Lost
Central	8	327	9.2%
Eastern	4	69	1.6%
Gorge	3	54	4.5%
North Coast	3	93	3.8%
Portland Metro	22	1,497	8.7%
South Central	2	41	2.2%
Southwestern	13	328	2.2%
Willamette Valley	17	352	1.5%
Total	72	2,761	4.0%

Source: OHCS

It is evident that the state has lost a significant number of units in manufactured dwelling parks in the last 15-plus years. Not all regions have been similarly affected. The Portland Metro region, while outside of the scope of HB 4079 pilot projects, was included to show that the loss of these units is concentrated much more heavily in certain areas. More relevant to the bill, Central Oregon has lost the greatest proportion of spaces for manufactured dwellings of all regions. The Gorge has also lost a larger percentage than the state.

Even within regions, not all counties are experiencing the same rate of closure. Using Central Oregon as an example, Deschutes County lost 318 of the 327 total units lost. Crook County lost nine units, and Jefferson County none. These two counties contain about 13% and 14% of the total number of units respectively, despite minimal losses. Similarly, all the closures in the Gorge are in Hood River County, despite Wasco County having twice as many spaces.

Reasons for park closures include redevelopment pressures, but also changes in the return on investment for park owners and changes in ownership. One affordable housing advocate we spoke with noted that park closures were commonly due to redevelopment between 2005 and 2009, but has since been largely due to changes in ownership. As a new generation of park owners inherits the current inventory, they no longer wish to operate the dwelling parks.² Redevelopment pressure is also occurring from some municipalities as they seek to redevelop areas that were previously on the edge of town, but have since become more central.

² John van Landingham (Personal communication, 14 September 2016).

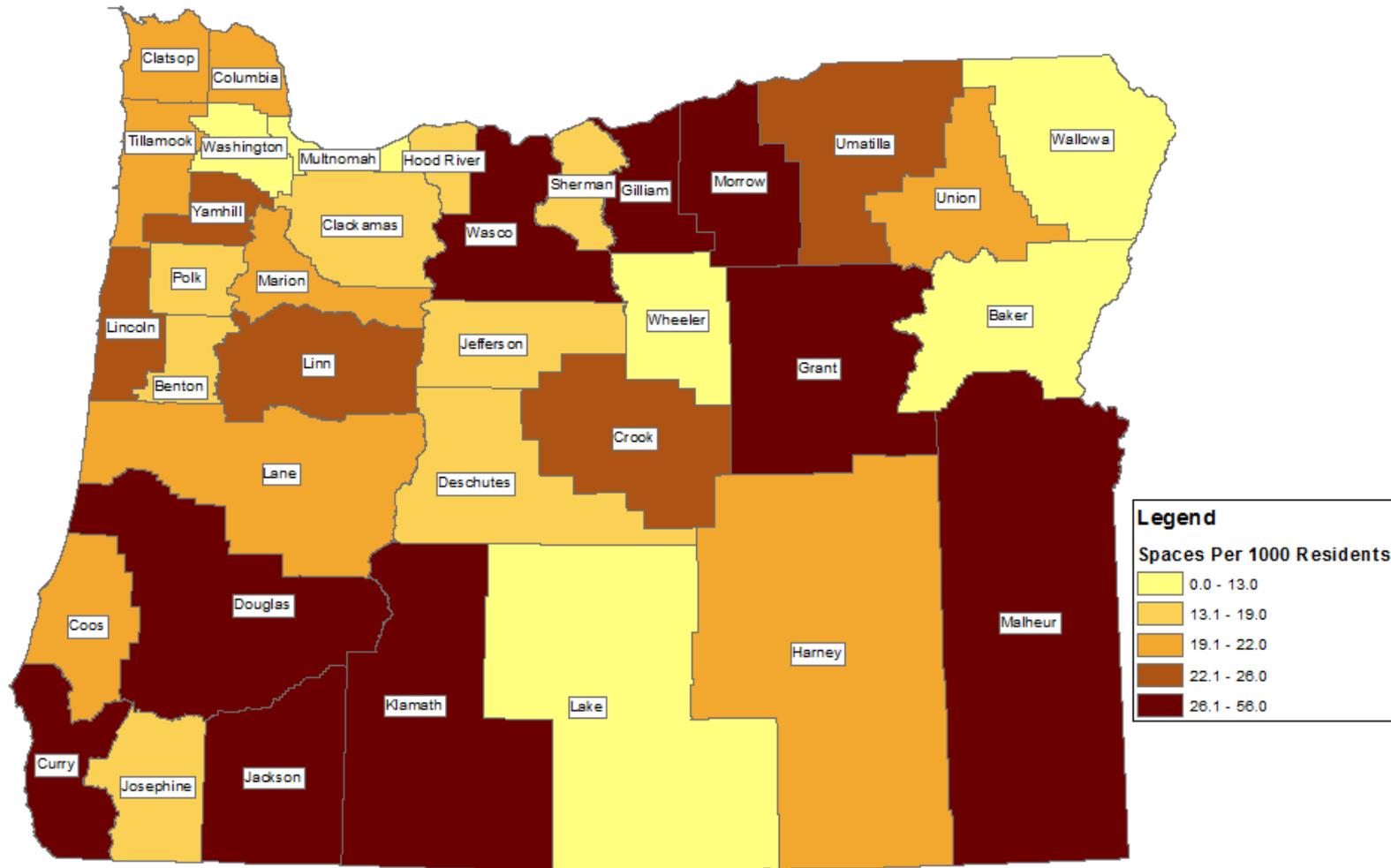
Residents' purchase of parks also contributes to the loss of park spaces. To avoid redevelopment pressure and the potential closure of parks, some residents are forming cooperatives to purchase manufactured dwelling parks. Once residents own the land, the dwellings are classified as real property and the spaces no longer meet the definition of a manufactured dwelling park. This is an emerging trend, and will likely contribute to future loss of park space while also maintaining the inventory of manufactured dwelling units.³

Manufactured Park Space Availability

This inventory of manufactured dwelling park spaces is not distributed equally by region, even when controlling for differences in population. Using Portland State University population estimates for 2015, we normalized the number of manufactured dwellings per 1000 residents. Counties, even within regions, varied considerably. Figure 3 shows the number of manufactured dwelling park spaces per 1000 residents. Darker colors indicate a greater number of spaces per 1000 residents. Certain portions of the state clearly have a greater concentration of manufactured dwelling park units, however, even among regions, the distribution is not even. It is not clear why such discrepancies exist among counties much more than among regions.

³ Ibid.

Figure 4: Manufactured dwelling park spaces per 1000 residents



Source: Community Service Center with data from OHCS and Portland State University

Mortgages

Many states classify manufactured housing as personal property rather than real property. ORS 308.875 codifies Oregon's approach that if the manufactured dwelling and land are owned by the same person, the unit is considered real property. Units in manufactured dwelling parks are considered personal property. This is an important consideration when considering financing of manufactured dwellings. Traditional mortgages are generally unavailable to many manufactured home owners, as their homes are not classified as real property.

The Housing and Economic Recovery Act of 2008 created a mandate for the Federal Housing Finance Agency (FHFA), the regulatory body of Fannie Mae and Freddie Mac, to take steps to improve the financing market for low-income families, including in the manufactured housing market. This rule applies to manufactured units considered real property, and part of the rule making process is to determine if the same requirements will be extended to personal property, which would include units in manufactured dwelling parks in Oregon.

The United States Department of Agriculture (USDA) also maintains a loan program to stimulate rural economic development. The Single-Family Housing Guaranteed Loan Program allows the USDA to guarantee up to 90% of a mortgage, including for a manufactured dwelling, provided that the owner meets moderate or low-income requirements and the unit is in a qualifying rural area. The program requires the mortgage to be taken against real property. This is a limitation for manufactured homes as Census data suggests up to 80% are assessed as personal property.

Average Lifespan of Manufactured Dwellings

Manufactured housing is required to meet federal regulations set by the Department of Housing and Urban Development (HUD). HUD requirements went into effect in 1976 with the goal of improving the quality of manufactured housing. This had the effect of drastically improving the lifespan of manufactured housing. Pre-HUD requirements, units had a lifespan of approximately 19 years. Post-HUD code, studies estimate that the lifespan of a manufactured dwelling is around 55 years.⁴ Maintenance and upkeep must be performed in a similar fashion to site-built homes to realize the expected lifespan.

Zoning of Manufactured Home Parks

Table 4 summarizes the zoning of manufactured home parks (MHPs), using the statewide generalized zoning layer. It is important to note that the statewide generalized zoning layer has some gaps in coverage, resulting in a large share of some cities' land area classified as "blank." The statewide generalized zoning layer covers 85% of the land area of HB 4079 jurisdictions. Properties with blank zoning are omitted from the table. The results show that 77% of MHPs are classified as residential while 16% are classified as commercial.

When examining by a more general zoning category, 43% are low density residential while 29% are high density residential.

⁴ Harris, J. C. and Carroll, J. (1998, April). "Manufactured Homes: More Attractive Than Ever." *Tierra Grande*. Retrieved from <https://assets.recenter.tamu.edu/documents/articles/1225.pdf>.

Table 4: Generalized Zoning for Manufactured Home Parks, Generalized Zones

Zone	Parcels	
	Count	Percent
Commercial	124	16%
Future Urban	2	0%
Industrial	20	3%
Public	3	0%
Residential	595	77%
High Density Residential	227	29%
Low Density Residential	336	43%
Mixed Use Residential	14	2%
Rural Residential	18	2%
Resource	29	4%
Total	773	100%

Source: DLCD Statewide Zoning; HB 2254 Tier 3 Database (Omits parcels with blank zoning, including 473 parcels) Includes Land Classification for last digit=7 mobile home parks.

Zoning and Density of Manufactured Homes

Table 5 summarizes the zoning of manufactured dwellings, using the statewide generalized zoning layer. It is important to note that the statewide generalized zoning layer has some gaps in coverage, resulting in a large share of some cities' land area classified as "blank." Properties with blank zoning are omitted from the table. The results show that 96% of manufactured homes are classified as residential.

Table 5 also shows average density of Mobile Homes, which is around 2 units per acre across all zones.

When examining by a more general zoning category, 76% are low density residential while 15% are high density residential.

Table 5: Generalized Zoning for Manufactured Homes, Generalized Zones

Zone	Parcels	
	Count	Percent
Combo	72	1%
Commercial	121	1%
Future Urban	15	0%
Industrial	84	1%
Public	17	0%
Residential	11,356	96%
High Density Residential	1,724	15%
Low Density Residential	9,018	76%
Mixed Use Residential	58	0%
Rural Residential	556	5%
Resource	130	1%
Total	11,795	100%

Source: DLCD Statewide Zoning; HB 2254 Tier 3 Database (Omits “blank” zoning, which constitutes 7990 parcels.) Includes parcels where land classification last digit = 9 (manufactured) and first digit is 1, 4 or 7 = residential, tract or multifamily.

The UO Research Team did not identify any data set that would allow simple analysis of the density of manufactured home parks. To get a general sense of densities, we used the OHCS database to identify park locations and then matched them to parcels by hand. This process was quite labor intensive, but resulted in a small sample that is probably representative of what densities look like statewide.

Table 6 shows the results of a sample of 32 manufactured home parks in the case study cities. All of the parks sampled were within UGBs. The analysis included 32 parks with 2,939 units. About two-thirds of the parks were family parks (e.g., not age restricted) and the remainder age 55+ parks. The sample parks averaged 7.14 dwelling units per net acre. The median density was 7.93 dwelling units per net acre. The parks showed considerable variation in density, with the lowest being 3.39 units per net acre (this park was in Bend and included considerable open space) and the highest being 23.17 units per net acre. Family parks averaged about 1.4 units per acre more than age 55+ parks.

Table 6. Average Density of Sample Manufactured Home Parks by Type

Type	Number of Parks	Number of Spaces	Acres	Average Density
55+	10	1,060	168	6.32
Family	22	1,879	244	7.71
Total	32	2,939	411	7.14

Source: OHCS Manufactured Home Park Inventory; ORMAP tax lot data; analysis by University of Oregon

IMPLICATIONS

In many locations, manufactured dwelling units are often considered more affordable than site-built homes—a fact borne out in Census Characteristics of Housing survey data. HB 4079 explicitly states that manufactured homes should be considered when establishing the pilot program. To this end, it is important to understand the distribution of these units and the recent trend of closures.

The proportion of residents that live in manufactured housing varies widely across the state, even within regions. Whether the discrepancy in supply is due to lack of demand, regulatory barriers, or something else is unknown. The causes of this are unclear based on the data. However, it is clear this housing type is especially important in certain places.

The number of residents living in manufactured dwelling units does not always correlate to the number of park spaces. The disconnect between park space availability and proportion of residents in manufactured housing is apparent in all regions. This may indicate that park spaces are more desirable in some locations, or more difficult to build in others.

The fact that manufactured dwelling parks are closing in certain areas suggests that there may be unique dynamics causing the loss of units at a greater rate than the state generally. In Hood River County, there are comparatively few spaces for manufactured units on a per capita basis. Hood River County has also experienced a significant loss of spaces since 2000. Deschutes County faces a similar issue.

It is not clear what the dynamics behind these changes are. One plausible reason for a loss of spaces in these areas is that land has become valuable enough to trigger redevelopment into another use. This may explain why the legislature began requiring compensation when manufactured dwelling parks change uses. Other explanations, such as changes in housing preference are possible as well. What is clear is that this housing type is generally in decline, though in certain areas there is a clear loss of units.

Another consideration for the RAC is whether mobile home parks would be developed if the land was set aside for such a use. Given the overall decline, it may be possible that this type of use is unsustainable from an economic perspective. On the other hand, if the issue is that land prices are driving the closures, especially in certain areas, the pilot program may be an effective tool to create units that are affordable to a wide swath of income levels.

APPENDIX A: HOUSEHOLDS IN MANUFACTURED DWELLINGS BY COUNTY

Region/County	Total Households in 2000	HH in Mobile Homes in 2000	% of HH in Mobile Homes in 2000
Central	71,166	11,927	16.8%
Crook County	8,264	2,012	24.3%
Deschutes County	54,583	7,546	13.8%
Jefferson County	8,319	2,369	28.5%
Eastern	75,512	14,714	19.5%
Baker County	8,402	1,393	16.6%
Gilliam County	1,043	179	17.2%
Grant County	4,004	1,074	26.8%
Harney County	3,533	885	25.0%
Malheur County	11,233	2,086	18.6%
Morrow County	4,276	1,535	35.9%
Umatilla County	27,676	5,167	18.7%
Union County	10,603	1,523	14.4%
Wallowa County	3,900	710	18.2%
Wheeler County	842	162	19.2%
Gorge	19,404	3,612	18.6%
Hood River County	7,818	1,109	14.2%
Sherman County	935	282	30.2%
Wasco County	10,651	2,221	20.9%
North Coast	53,163	6,701	12.6%
Clatsop County	19,685	1,641	8.3%
Columbia County	17,572	2,857	16.3%
Tillamook County	15,906	2,203	13.9%
Portland Metro	604,428	24,412	4.0%
Clackamas County	136,954	11,543	8.4%
Multnomah County	288,561	6,184	2.1%
Washington County	178,913	6,685	3.7%
South Central	32,882	6,765	20.6%
Klamath County	28,883	5,572	19.3%
Lake County	3,999	1,193	29.8%
Southwestern	192,913	35,178	18.2%
Coos County	29,247	4,706	16.1%
Curry County	11,406	2,978	26.1%
Douglas County	43,284	9,364	21.6%
Jackson County	75,737	11,528	15.2%
Josephine County	33,239	6,602	19.9%
Willamette Valley	403,241	46,423	11.5%
Benton County	31,980	2,198	6.9%
Lane County	138,946	15,531	11.2%
Lincoln County	26,889	4,384	16.3%
Linn County	42,521	6,703	15.8%
Marion County	108,174	10,874	10.1%
Polk County	24,461	2,534	10.4%
Yamhill County	30,270	4,199	13.9%
Total	1,452,709	149,732	10.3%

Region/County	Total Households in 2008-2012	HH in Mobile Homes in 2008-2012	% of HH in Mobile Homes 2008-2012
Central	100,050	11,314	11.3%
Crook County	10,204	1,669	16.4%
Deschutes County	80,039	7,308	9.1%
Jefferson County	9,807	2,337	23.8%
Eastern	80,398	13,510	16.8%
Baker County	8,826	1,274	14.4%
Gilliam County	1,173	248	21.1%
Grant County	4,327	1,048	24.2%
Harney County	3,815	1,145	30.0%
Malheur County	11,675	1,949	16.7%
Morrow County	4,448	1,245	28.0%
Umatilla County	29,707	4,076	13.7%
Union County	11,444	1,710	14.9%
Wallowa County	4,101	605	14.8%
Wheeler County	882	210	23.8%
Gorge	21,610	3,017	14.0%
Hood River County	9,280	765	8.2%
Sherman County	900	254	28.2%
Wasco County	11,430	1,998	17.5%
North Coast	60,539	6,110	10.1%
Clatsop County	21,563	1,282	5.9%
Columbia County	20,639	2,599	12.6%
Tillamook County	18,337	2,229	12.2%
Portland Metro	693,511	22,149	3.2%
Clackamas County	156,933	9,752	6.2%
Multnomah County	324,192	6,657	2.1%
Washington County	212,386	5,740	2.7%
South Central	37,150	6,493	17.5%
Klamath County	32,737	5,250	16.0%
Lake County	4,413	1,243	28.2%
Southwestern	220,682	33,979	15.4%
Coos County	30,569	4,468	14.6%
Curry County	12,569	2,971	23.6%
Douglas County	48,775	8,820	18.1%
Jackson County	90,814	11,469	12.6%
Josephine County	37,955	6,251	16.5%
Willamette Valley	459,653	43,196	9.4%
Benton County	36,301	2,425	6.7%
Lane County	155,815	14,024	9.0%
Lincoln County	30,516	4,490	14.7%
Linn County	48,718	6,170	12.7%
Marion County	121,057	10,213	8.4%
Polk County	30,190	2,198	7.3%
Yamhill County	37,056	3,676	9.9%
Total	1,673,593	139,768	8.4%

APPENDIX B: MANUFACTURED HOME PARK DENSITY SAMPLE

County	Park Name	Park Type	Park Location	City	Spaces	Acres	Density
DESCHUTES	Country Sunset	Family	61445 SE 27th St 2601 NE Jack London	Bend	148	31.2	4.74
BENTON	North Star Park MHC	Family	St	CORVALLIS	169	31.1	5.43
JOSEPHINE	Country Estates Suntree Village Mobile Home	55+	4571 Lower River Rd	GRANTS PASS	103	30.35	3.39
DESCHUTES	Park	55+	1001 SE 15th St	BEND	214	27.31	7.84
LINCOLN	Longview Hills MHC	55+	450 NE 58th St	NEWPORT	169	26.3	6.43
BENTON	Meadow Park Mobile Estates	55+	277 NE Conifer Blvd	Corvallis	149	26.27	5.67
DESCHUTES	The Pines	Family	61000 Brosterhous Rd	BEND	202	24.14	8.37
UMATILLA	Chateaubri Mobile Home Park	Family	1030 SW 11th St	HERMISTON KLAMATH	119	19.36	6.15
KLAMATH	Emerald Estates	Family	4751 Bellm Drive	FALLS	100	17.36	5.76
LANE	Chalet Village MHC	55+	205 S 54th St., #119	SPRINGFIELD	121	16.17	7.48
MALHEUR	Treasure Valley Mobile Village	55+	26 Winegar Dr	ONTARIO	116	15.61	7.43
DESCHUTES	Fox Hills Mobile Home Court	Family	61058 Alopex Ln	BEND	62	14.58	4.25
BENTON	Knoll Terrace MHC - Corvallis	Family	5055 NE Elliott Circle 4800 North Pacific	Corvallis CENTRAL	212	13.86	15.30
JACKSON	Miller Estates	55+	Hwy	POINT	76	13.1	5.80
LANE	Granada Estates	Family	5335 Daisy St	Springfield	112	12.21	9.17
DESCHUTES	Juniper Hilltop MHP, LLC	Family	63930 N Hwy 97	BEND	53	12.11	4.38
UMATILLA	Dun Rollin Mobile Home Court	Family	445 East Jennie Ave	Hermiston	103	9.82	10.49
BENTON	Capri Villa	Family	755 NE Circle Blvd 2325 NW Highland	CORVALLIS	82	8.93	9.18
JOSEPHINE	Country View Mobile Park	55+	Ave	Grants Pass	59	8.48	6.96
HOOD RIVER	Hood River Mobile Manor	Family	3300 Cascade	HOOD RIVER KLAMATH	48	7.69	6.24
KLAMATH	Aaspen Mobile Village	Family	3950 Homedale Rd	FALLS	96	7.13	13.46
MALHEUR	Cooper Country Mobile Estates	Family	759 NW 8th St	ONTARIO	50	6.49	7.70
LANE	Springfield Mobile Home Park	Family	1263 Main St	Springfield CENTRAL	80	5.78	13.84
JACKSON	Rustic Mobile Home & RV Park	Family	2161 Taylor Rd	POINT	45	5.25	8.57

County	Park Name	Park Type	Park Location	City	Spaces	Acres	Density
UMATILLA	Buttercreek Mobile Home Park	Family	1210 SW 11th St	Hermiston	40	4.98	8.03
MALHEUR	Idlewheels Trailer Park	Family	489 2nd Ave E 1275 Rogue River	Ontario	49	4.32	11.34
JOSEPHINE	Fruitdale Mobile Home	Family	Hwy	GRANTS PASS	40	2.63	15.21
UMATILLA	True Hill Mobile Home Park	Family	325 NW 11th	Hermiston	24	2.56	9.38
TILLAMOOK	Laurelwood Mobile Home Park	55+	3315 3rd St	Tillamook	25	2.47	10.12
LINCOLN	Surfside Mobile Village	55+	392 NW 3rd St	NEWPORT	28	1.56	17.95
LINCOLN	Eastside Trailer Court	Family	636 NE 2nd St	NEWPORT CENTRAL	26	1.51	17.22
JACKSON	Shady Oaks Trailer Park	Family	119 W Pine St	POINT	19	0.82	23.17