## Manufactured Home Park Solutions Collaborative

Local Agency Toolkit

Content for the Local Agency Toolkit was developed through a collaboration of local, state, federal and non-profit housing authorities.



Publication development funding was provided by USDA Rural Development.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

#### Manufactured Home Park Solutions Collaborative Local Agency Toolkit Online:

http://www.oregon.gov/ohcs/CRD/ mcrc/docs/09-14-2016-Manufactured-Home-Park-Preservation-Toolkit.pdf

Published 9/30/2016 Version 1.0

### Contents

I. Introduction & Local Agency Toolkit Purpose	5
2. Background on Manufactured Home Park Trends in Oregon	8
3. Conducting a Park Inventory	12
4. Analyzing for Risk of Closure	17
5. Roles and Responsibilities if a Park is Closing	22
6. Park Closure: What to Do	25
7. Appendix	34

## Introduction & Local Agency Toolkit Purpose

Local and state leadership agree the issue of mobile home park closure is a priority topic and highly sensitive issue. There is general acknowledgement of the complications and unique factors associated with each potential and actual closure instance, coupled with the wide range of tools and practices used by different communities when attempting to manage the sudden impacts to their resource and recourse-challenged citizens.

#### Disaster preparedness response

- A toolkit is critically needed. Manufactured home parks, sometimes referred to as 'mobile' home parks, are dispersed throughout the state: 45% percent of Oregon's manufactured home parks are located in more than 1,000 communities across the state.
- Communities throughout the region acknowledge the issue as one that directly impacts their jurisdictions and warrants partnerships to help mitigate burdens to citizens (often low-income), local governments, and service providers.
- While the issue is highly sensitive, there is no dispute among cities or counties—it is one all communities will be faced with in the near future.
- The primary purpose of the toolkit is focused on how to respond when there is a closure
  - ♦ In some cases, however, there may be options available to preserve a park through non-profit or resident ownership. These are outlined in **Section 2**.

The City of Springfield is one example of an Oregon community grappling with a large population of manufactured home park residents (estimated 1,400 households) facing a strong risk of displacement. Neither the local governments nor regional service providers are currently equipped to meet the difficult challenge of sufficiently serving displaced residents in helping them find new housing. As a result, the City organized stakeholder meetings, with Oregon Solutions' participation, to identify how to assist residents, owners, and renters living in mobile homes in parks who may be living in substandard conditions and/or who face being evicted as a result of redevelopment pressures. The stakeholder meetings focused on bringing the overarching concerns and complicating factors to light and making a call to action of regional partners.

In 2016, Governor Brown designated the Manufactured Home Park Closure and Tenant Displacement Project an Oregon Solutions Project. For ten months, the City convened local, state and federal partners in developing a coordinated housing and social service assistance response to serve these vulnerable Oregon populations.

Additional partnership came from the Oregon Field Office of the US Department of Housing and Urban Development, which designated Springfield and Eugene as the focus of its two-year Community Needs Assessment program for 2015-2017. As part of this initiative, HUD identified distressed manufactured home parks as a key engagement area. Prior to this, the South Willamette Valley Regional Solutions (SWVRS) Board designated the mobile home park issues topic a priority project for Solutions Team staff.

The project concluded in September 2016 with the signing of a **Declaration of Cooperation** memorializing the commitments made by the participants and aligning available resources. This alignment of resources is captured in what is being called a **Local Agency Toolkit**. The Toolkit is intended to serve as a model for use by other communities facing similar challenges, helping the community **organize and assess** their manufactured housing areas in advance of a crisis while organizing resources ahead of a closure to aid in a more efficient **rapid response**.

#### What's in the Toolkit?

- Communitywide Manufactured Home Park Inventory
- Communitywide Manufactured Home Park Assessment
- Organization of Communitywide Service Providers
- Sequence for Rapid Response Service Delivery to Closure-Impacted Residents

### What's in the Toolkit?

- Communitywide Manufactured Home Park Inventory
- Communitywide Manufactured Home Park Assessment
- Organization of Communitywide Service Providers
- Sequence for Rapid Response Service
   Delivery to Closure
   Impacted Residents

### How should a community use this Toolkit?

The Toolkit is intended to be a resource, guiding communities to effectively evaluate existing manufactured home park community conditions while organizing existing community resources. The Toolkit provides methods and suggestions for engaging stakeholders and service providers in an effort to create an organized framework for efficient responses, decision making, and resource utilization. Ultimately, each community is different and may elect to adopt parts of this Toolkit as-is while modifying others to fit their unique needs. The resources included in this toolkit and recommended methods of organizing and assessing are just that, recommendations. The resources in this Toolkit are intended to guide a community to:

- **Designate a Lead Agency** (may be City or County government) to do park assessment and coordinate outreach to owners, residents and services
- Conduct an Inventory of Parks in your community
- Assess the Risks associated with your Parks
- Build a network of engaged service providers
- Locate/prepare organization to perform counseling services for residents (housing counseling agency) who may need to seek alternate housing
- Develop a plan of action on how to address park closure
- **Get familiar with funding options** for park improvement and preservation, building alternate sites, and/or resident relocation (included in appendix to toolkit)
- Adjust the recommended tools and process to fit your community

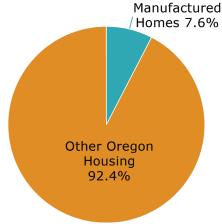
### Toolkit Uses & Goals

- Update community assessments, agency responsibilities, & key stakeholder information
- Annual meeting to confirm partnerships & action plan awareness
- Lead agency to engage park owners every
   3-5 years to maintain updates and ongoing communication

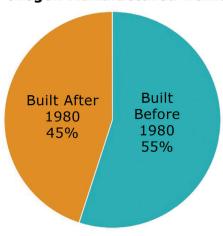
The **Local Agency Toolkit** is a living document which will require the adopting community to revisit both the assessment data and multi-agency relationships in an effort to update community assessments, agency responsibilities and key stakeholder contact information and expectations. It is recommended that communities meet on an annual basis with service providers and agencies identified within the toolkit to confirm partnerships, staff contacts, and awareness of the action plan and toolkit. It is also recommended that the lead agency engage park owners every three to five years to confirm ownership, update park assessment information, and maintain familiarity and ongoing communication.

# Background on Manufactured Home Park Trends in Oregon





#### **Oregon Manufactured Homes**



Each manufactured home park is unique with varying levels of park and structure affordability, health, resident ownership, and risk of closure. Despite the many unique traits, manufactured home parks across the state provide an important affordable housing option for community members. And while by varying degrees, parks are all universally impacted by a combination of similar characteristics: their affordability, age of structures and infrastructure, stability of residents and ownership, and pressures from the surrounding market.

## Manufactured Homes are an important asset of affordable housing

In Oregon, manufactured housing plays a small but important role in the affordable housing market. There are nearly 140,000 manufactured homes in Oregon, accounting for 7.6% of the total housing stock and housing 8.3% of the population.

More than 55% of manufactured homes in Oregon were built before 1980; HUD began regulating the construction of these homes in 1976, but uniform adherence to the new code took time to reach all parts of the industry.

## Residents can experience instability even when they own their homes

Manufactured homeowners who live in investor-owned manufactured home parks might face even more instability. While

residents own their homes, they do not own the land upon which their home sits. Manufactured homeowners in investor-owned parks can be subjected to prohibitive increases in space rents and consistently face the threat of displacement due to park closures as a result of failing infrastructure or redevelopment. Residents who are displaced may be forced to leave their homes behind if the structure is not stable enough to be moved or if they cannot find another park that will accept their home. In some cases, residents may still be responsible for a mortgage on a home that they are forced to abandon. This can result in not only a loss of their asset, but may put them at even further financial risk.

#### Risk of closure

Manufactured home parks can be at risk for closure due to different reasons and factors, sometimes a combined set of factors. Many of these parks and/or structures are distressed, beyond their designed life, and are facing infrastructure failure, park overcrowding, informal agreements between park owners and structure owners and renters, and impacts of redevelopment where the park is on non-conforming industrially-zoned and/or on privately-owned land. These factors create an environment where park residents may be at risk of being displaced, and municipalities and regional service providers may be unprepared for the sudden impact to a group of residents requiring housing assistance. Additionally, as parks age, so too does the infrastructure and, if left unmaintained, aging infrastructure can result in significant failure of systems, creating health and safety issues to residents. This type of risk factor, if not quickly addressed by a park owner, can result in a high risk of closure with little notice in advance.

It is also important for communities to be aware of local landuse and market pressures. Some manufactured home parks may be located in areas that are not conducive to residential neighborhoods, like industrial areas or high commercial traffic centers. This conflict of uses can result in growing market pressures from redevelopment interest, which might suggest a change in use from residential to one aligned with the surrounding industrial or commercial areas.

These are only brief examples of a small number of risk factors. Risk of closure is discussed in more detail in **Section 4** of this document, "Analyzing for Risk of Closure."

#### Reasons a Park Might be at Risk of Closure

- Sewer/Septic and Electric Failure
- Land-Use and Market Pressures
- Environmental Conditions (e.g. code compliance)
- Park Ownership
- Past/Current Park Owner Communications
- Social Characteristics

## Tools for preserving manufactured housing

While in some cases redevelopment may be necessary or desirable, in situations where a closure is not the desired outcome, two preservation models exist to prevent the loss of this valuable affordable housing resource: resident ownership and ownership via a non-profit or housing authority.

Resident ownership is one of the most effective ways of preserving affordable manufactured housing. It also promotes secure tenure and encourages wealth-building and asset appreciation via manufactured home ownership. A resident-owned community (ROC) is a cooperative entity created by manufactured housing park residents to purchase and control the park and manage infrastructure, operations and common areas. In situations where a resident purchase isn't feasible, the same level of security and stability may be achieved through non-profit or housing authority ownership.

For both of these models to be successful, however, it is important to ensure that the necessary policies and financial resources are in place and accessible to the organizations which specialize in affordable manufactured housing preservation. Some of these include:

- Establishing manufactured housing as an approved use in consolidated plans
- Adopting local tax or other financial incentives
- Designating set-aside funds for park preservation
- · Inclusion of manufactured housing in comprehensive plans
- Zoning for manufactured housing parks



## Park Presentation Snapshot: Umpqua Ranch Cooperative

Residents of the 110-space Forrest Ranch Mobile Home Park had cause to celebrate when they closed on the purchase of their community on October 1, 2015. Located in Idleyld Park on the scenic Umpqua River in Douglas County, residents of the Forrest Ranch Mobile Home Park formed the Umpqua Ranch Cooperative and, with support from CASA of Oregon, Oregon Housing and Community Services and Banner Bank, converted their community to resident ownership. With assistance from CASA of Oregon, the cooperative has taken on over \$2 million in health and safety infrastructure improvements. "I am most excited about the improvements to our community. Slowly but surely we are seeing improvements each day. We are confident our park will be a beautiful place in the future," said Christy Conklin, Board Secretary of Umpqua Ranch Cooperative.

## Conducting a Park Inventory

The community park inventory is intended to generate a baseline of information about the ownerships, age, structural health, and unique characteristics of the manufactured home parks within a community. The inventory, and process of completing the inventory, promotes communication between the community lead agency and the local park owners and residents. The inventory should be completed in advance of anticipated closure and should be completed community-wide, gathering information about all parks within the community during the same time period. This is to ensure the assembled data is truly a reflective snapshot of a community's parks and risks for closure.

The park inventory is intended to aid the lead agency in:

- Promoting communication with park owners and residents
- Assessing potential risk of manufactured home park closures
- Identifying potential resources available for identified needs
- Brainstorming and identifying solutions for specific areas of risk

The park inventory is intended to gather information on each park in the following categories:

- Sewer/septic and electric; system design and current health and use
- Land use, permitted, zoning, conforming use
- Environmental conditions

- Park ownership
- Park owner communication
- Social characteristics

Included in this toolkit is an initial letter introducing the lead agency and initiative of completing a community wide park assessment as well as a draft park assessment questionnaire. Once assembled, the information will be used to perform an assessment of the park's risk for closure.

## How might a community complete the park inventory?

Completing a community wide park inventory includes three recommended steps: establishing communication with park owners and initiation of a survey; conducting research in areas of land-use, infrastructure and social traits; and assembly of gathered data.

#### Completing a Park Inventory

Step 1: Establish Communication and Survey the Park Owner

Step 2: Conduct Research

Step 3: Assemble Data

## Step I: Establish Communication and a Point of Contact for Park Owners and Initiate a Survey

An initial letter, coupled with a survey, should be mailed to each park owner. Depending on the specific traits of the particular community, initial outreach in person or via phone call may be beneficial to alert park owners of the letter to be mailed. The letter creates a communication opportunity between the lead agency and park owner, providing basic resource references and describing Springfield's goals for assessing parks. This toolkit includes a template introduction letter and survey. The survey requests information, as it pertains to the specific park, which may be unknown to the lead agency and/or a confirmation of any information believed to be known but requiring verification. This information, in addition to influencing future steps in assessing park risk of closure, is anticipated to be beneficial in

Date
Park owner
Street Address
City, State, Zip Code
To Whom it May Concern
The City of Springfield
We request that you please take a few minutes to complete the attacked questionnaire in order to better
help on inventorly exhining mobile and numificational doese parks within the Springfield commonly. Our
goal is to better understand the characteristics of all mobile and numification them park communit
ties in Springfield. We desire to be responsive to, and proactive in, discussing future potential needs of
your park and residents. We would be heppty to schedule a time for our staff to most with you, and with
through the questionnaire and answer any of your questions.
Any responses you can provide, to the best of your adility, will be included in our citywide inventory
We anticipate updating this inventory every 3-5 years. There are no fews associated with this inventory
and we hope that you will take the opportunity at the end to the shown how we might be able to better
support and aid your park and residents.
We understand thay our may have questions about our request for information specific to your park and
the intended use of the information. We are most concerned with our ability to serve our community
which includes grow owners and residents. For your conventione, included in this palet is an informational dose of potential resources and agencies that may be of interest to you and/or your residents
regarding this questionnaire or to schedule a time to meet with our staff.

Sincredy

Mayor Christine Landlerg
City of Springfield

	Park Assessment Questionnaire
	Please confirm the below information pertaining to name, ownership, and contact information for you park is correct. Please complete information where none is indicated.
1	INSERT PARK NAME HERE] INSERT REGISTERED OWNER NAME HERE] INSERT PROPERTY OWNER MAILING, ADDRESS HERE] INSERT ONSITE PROPERTY MANAGER CONTACT NAME AND INFORMATION HERE]
***	Name:
1	Email:
2	Mailing Address:
1	Phone Number:
1	Preferred method of contact:
1	Please select all that apply to the organization/individual which owns [INSERT PARK NAME HERE].  — Registered Non-Profit Organization  — Organization/Individual Also Owns Park(s) in Other Locations
2	My park is currently connected to:City Sanitary Sewer Private Septic System
	f your park is connected to a private septic system, when was the last known date of service to this system approximate)? Do you know of any upgrades to the system?
1	Please describe the general state of this system, including any trouble with water quality or effluent:
1	Oo you anticipate any significant upgrades or investments to the system in the next  12 Months 2-5 Years I do not anticipate any upgrades or investments to the system.
1	What is the total number of mobile home and/or RV spaces in your park?
1	As of today, how many of these spaces are occupied?
1	What number of occupied spaces are residents who own their home?
	Are you accepting new/used structures in your park?Not accepting unitsYes, accepting both new and usedYes, but only accepting new units
	f you answered "yes" to used structures, what restrictions do you place on structures looking to move nto your park? Please describe:
-	Has the park received any notice or communication from the Department of Environmental Quality while under your ownership?NoYes If yes, what was the date of this contact?

\*See sample letter and questionnaire in Appendix G.

providing support, partnership and responsiveness in the case of park closure, community emergency or potential park opportunities and improvements.

If necessary, a follow-up letter at the 3-6 month range can be issued. The second letter can include areas of the survey filled in by the Lead Agency based on review of available public records.

In addition to direct mailings to each park owner, Lead Agencies can partner with the Mobile Home Coalition to provide the survey by email to park owners. This partnership can improve the response rate and initial goal to promote communication between the Lead Agency and park owners and residents.

See sample letter and questionnaire in Appendix.

#### Step 2: Conduct research

If the park owner is unresponsive, or does not know the answer to survey questions, the lead agency will need to work to complete the survey for each park to the best of their ability. Some park-specific information can be found by researching several public information databases likely to be in existence in each community or county.

#### Types of Information and Potential Resources for Completing a Park Assessment Survey:

#### Sewer/septic and electric

On-Site Wastewater Management: Local county records may have documentation of on-site systems. In some regions this information is located in a county's land management division. Land management oversees septic permit processes including wastewater permits, Department of Environmental Quality, land use compatibility, and existing and decommissioned septic tank certifications.

## Land use, permitted, zoning, conforming use

County Public Record: Counties in Oregon typically maintain a publicly-accessible regional land inventory database. This database may be accessible with differing levels of detail based on the relationships with the lead agency. Regional land inventory databases often include tax lot and taxpayer-specific records. While these records are not always current on title holder, the records are generally accurate within 6 months of reported sales or transfers of structures and land. The inventory is likely to include reported property information specific to:

- Real Market Value (RMV) of structures
- Land owner and mailing address
- Structure owner (sometimes different) and mailing address
- Zoning category of land
- Incorporated/Unincorporated status of park

Community Building Department: Each community will have a designated agency responsible for reviewing and approving/denying building plans and property improvements. A building department maintains records of pending, active, approved, and final building permits with information specific to the type of improvement made.

#### **Environmental** conditions

**Department of Environmental Quality:** the DEQ Water Quality Program Western Region office is managed by Dave Belyea. Each region office is assigned a region specific manager. A lead agency should determine the manager for their specific region. A park may be in communication with Water Quality Program staff on topics related to issues with septic or water systems that might have an impact on environmental conditions in and around the community.

#### Park ownership

The regional land inventory database is also likely to provide information on recorded sales and ownership of specific parks and/or associated lands. Similarly, structure ownership is also likely to be included in accessible database information.

#### Park owner communication

Establishing relationships with regional service providers, building officials and inspectors, and city or county planning departments can result in determining historical park owner communications regarding infrastructure improvements, use changes and even social or criminal issues.

#### Social characteristics

City Code Enforcement: A community's code enforcement staff is responsible for responding to complaints of nuisance violations on private property. A lead agency should determine the organization responsible for providing notice of code violations. Code enforcement staff may be able to query park addresses, generating a past history of contacts, issued citations, and resolutions at a particular address.

Public Safety Department: the community law enforcement agency is responsible for responding to calls for service. In some cases this might be the local police department, in other communities law enforcement may be a county responsibility, and in other cases it may be a combination of both. Records staff may be able to query park addresses, generating a past history of contacts, citations, disputes, and general activity at the address as it pertains to calls for service.

#### Step 3: Assemble data

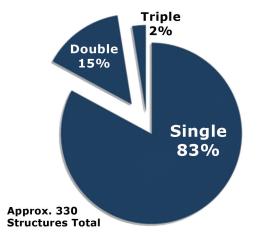
Once gathered, data might be assembled in multiple ways to illustrate unique or important patterns. For example, in the sample figure below, park ownership is illustrated by park owner state/country of residency, providing a reflection on the local vs. non-local nature of park ownership in a community. An additional way to assemble this data might be to reflect the number of individual manufactured home unit sites by park owner, reflecting the number of residents impacted by local vs. non-local park ownership. Each provides an important perspective on the traits associated with parks in a particular community.

Another example of data assembly, as reflected below, captures the size of mobile home park structures within a generally recognized geographical area or neighborhood. While assessment of the data to reflect a community-wide trend and size of structures is valuable, trends specific to a particular neighborhood may be useful in later evaluations of risk of closure. Template/sample survey document





### Mobile Home Structures in Glenwood Parks by Structure Width



## Analyzing for Risk of Closure

#### Areas for Risk of Closure

- Sewer/Septic and Electric Failure
- · Land-Use and Market Pressures
- Environmental Conditions (e.g. code compliance)
- · Park Ownership
- Past/Current Park Owner Communications
- Social Characteristics

Once you've conducted an inventory of each park, you can use the information gathered to help identify areas of risk to particular parks and potential relevant resources or mitigation actions, if any. The identification of these areas of risk are intended to assist staff in identifying areas of sensitivity and need as it relates to building relationships with park owners, residents, and resource providers. This awareness also begins conversations about potential areas for land-use evaluation and assessment if such work could improve the ability to responsibly preserve a park. This is an art, not a science, and the analysis will come down to what you know about your community.

Mobile Home Park Category and Risk Status	Low	Medium	High
Sewer/septic and electric	Known with little or no issues	Known but with significant issues; possibly requiring system replacements	System unknown, or system failing
Land use, permitted, zoning, conforming use	Conforming, may be minimally overcrowded	Nonconforming zon- ing; minimally over- crowded, appropriate units in residential conducive area	Nonconforming zon- ing; more units than originally permitted
Environmental conditions (e.g. code compliance, DEQ letter)	Little to no code enforcement contact; no building inspection contact	Some building staff contact but resolved; some code enforce- ment contact	DEQ contact on record; unresolved code compliance; unresolved building inspection concerns
Park Ownership	Non-profit	Private, multi-park owner	Private, single-park owner; response
Park Owner Communication	Responsive & Helpful	Responsive & Resistant	Non Responsive
Social characteristics	Minimal emergency calls for services	Misc. emergency call volume is high	Call volume high. Call types are high risk.

#### Park Risk Assessment Categories

#### Conducting the risk analysis

Once completed, survey information from each park should be assembled and used to analyze local parks and assess potential risk for closure. As previously slated, this assessment is not scientific and is intended to generate a detailed and thoughtful examination of a park's overall health and risk. The table above is intended to provide a community with a visual summary tool to capture, at a high level, themes within the information assembled through the survey and internal data gathering.

Examples of traits that may be indicators of park risk for closure. No single trait should be considered a definitive determination of closure, but each should be identified and in parks where multiple areas of concern exist, a risk of closure might be assigned.

- Sewer/Septic and Electric Failure
- Land-Use and Market Pressures
- Environmental Conditions (e.g. code compliance)
- Park Ownership
- Past/Current Park Owner Communications
- Social Characteristics

For example, a park may be identified as at risk for closure due to the park being a non-conforming use. It is not uncommon for existing mobile home parks to be located on land zoned for uses other than residential. This occurrence is referred to as a **non-conforming use.** While the park may not be at risk for closure based solely on non-conforming status, the zoning status is an indicator that other economic and development pressures may be in existence, generating potential for redevelopment to designated conforming uses. The park may be located in an area zoned as light-medium industrial. The park owner may be faced with private or public interest or forecasted financial benefit to sell and/or redevelop the property to an industrial use. In many communities, non-conforming uses may be required to be brought up to conformance should the property be deemed vacant for an extended window of time or should significant changes or improvements be implemented.

With these factors coupled with an unresponsive property owner with limited experience in owning any additional parks, it could be determined that the park may be at risk. The park owner could see value in placing the property on the market as opposed to investing limited resources into expensive upgrades to aging or unknown infrastructure systems on a pre-existing non-conforming use.

It is important for the lead agency to be aware of which parks are conforming and non-conforming to the local land use designations, as those parks categorized as non-conforming may be more at risk should park ownership change, significant improvements be needed or proposed, or redevelopment interest exist. More importantly, it is key for the lead agency to complete the assessment thoughtfully and with awareness to the relationship between each area of influence.

### What Happens When a Park is Determined to be at Risk?

The key drivers behind a park's risk of closure are essential for the community lead's preparation to be most proactive, responsive and effective when confronted with park closure or early signs of potential closure. It should be noted that not all park closures can be avoided, and this toolkit is intended to provide resources for assessing park health and risk throughout multiple stages of a park life.

- The lead agency should work to understand the demographics of the community residing within the park. Gaining awareness of potential needs and key services as they pertain to a neighborhood could be key for being prepared to respond should displacement be imminent. If a population is primarily comprised of renters, support in first time home buyer counseling or affordable housing voucher obtainment may be key priority resources. If a community is identified as 55 years or older, an organization specializing in senior services and/or Medicare may be key to providing effective support.
- The lead agency should assess currently available resources for infrastructure/site upgrades, if any. When appropriate, resources may exist that might be provided in some form to a park owner or tenant to remediate an outstanding infrastructure failure issue. In areas where the park is determined to be an appropriate (conforming) land-use area, investments in systems may improve the health and safety of the park environment.
- Communication may be initiated by the lead agency with local law enforcement to determine if social or criminal behavior is contributing to the risk of closure. Clarity on the types of calls and social trends within the park are important to understanding the possible opportunity for improving the situation. In appropriate instances, increased patrols, neighborhood meetings, and communications with a park owner may be effective in curbing some of the negative behavior and traits.
- If risk of closure appears to be imminent, the assembly of clear and effective information pertaining to the rights of residents, as well as roles and responsibilities of the park owner and local governments is key. Many states and communities have adopted rules and regulations around

manufactured home park closures and these rules and regulations should be clearly communicated, understood, and frequently reviewed. The State of Oregon rules pertaining to park closure are included on the State website and also captured briefly in Section VI of this document. An adopting lead agency should research to determine the specifics of their regional rules and regulations pertaining to park closure.

NOTES		

## Roles and Responsibilities if a Park is Closing

#### • ORS 90.842:

https://www.oregonlegislature.gov/bills\_laws/ors/ors090.html

#### • ORS 90.645:

https://www.oregonlegislature.gov/bills\_laws/ors/ors090.html)

#### • OARs 813-065-0100 to 813-065-0150:

https://arcweb.sos.state.or.us/pages/rules/oars 800/oar 813/813 065. html

#### • ORS 90.630:

https://www.oregonlegislature.gov/bills\_laws/ors/ors090.html

#### Park Owner—only if park is for sale

- As noted in **ORS 90.842** (https://www.oregonlegislature. gov/bills\_laws/ors/ors090.html), a park sale requires notification of tenants, MCRC and CASA. The sale of a park is not necessarily a park closure, but rather a change of ownership. Under ORS 90.842 residents have the opportunity, with the assistance of CASA, to incorporate and produce a financial package, and make an offer to purchase the park. Note residents are required to express their interest to purchase within 10 days of notification of intent to sell by park ownership. It is imperative for residents to contact CASA immediately upon receipt of a Notification of Intent to sell.
- ORS 90.645 (https://www.oregonlegislature.gov/bills\_laws/ors/ors090.html) defines owner responsibilities pertaining to mobile home park closures. The below summary is only for reference and general in nature, and should not be substituted for legal or tax advice.
- Landlords/Park Owners are required to issue written notice, as specified in **OARs 813-065-0100** to **813-065-0150** (https://arcweb.sos.state.or.us/pages/rules/oars\_800/oar\_813/813\_065.html) and **ORS 90.630** (https://www.oregonlegislature.gov/bills\_laws/ors/ors090.html), of termination of a rental agreement due to facility closure to affected park residents by:
  - ♦ Providing the tenants with a 365 day notice which shall state; at a minimum:

- ♦ That the landlord is closing the park, or a portion of the park, and converting the land to a different use;
- ♦ Designate the date of closure; and
- ♦ Include the tax credit notice:
- state the eligibility requirements for the credit;
- information on how to apply for the credit;
- any other information required by the Office of Manufactured Communities Resource Center; and
- state that the closure may allow the taxpayer to appeal the property tax assessment on the manufactured dwelling.

## Manufactured Communities Resource Center (MCRC)

The Manufactured Communities Resource Center (MCRC) (http://www.oregon.gov/ohcs/Pages/manufactured-dwelling-park-services-oregon.aspx) program provides services and information to residents and landlords of Oregon manufactured dwelling parks to promote cooperative community relationships and positive alternatives to the court system. This service offers timely resolution to disputes and keeps disputants out of court where possible. Additionally, the program directly provides information and education platforms related to landlord/ tenant statutes. MCRC fosters collaborative relationships with non-profits and industry trade groups to enhance those informational and educational objectives. Consistent with ORS 90.645 and Section 446.543 (https://www.oregon.gov/ohcs/CRD/ mcrc/docs/oregon-revised-statute-chapter-446.html), MCRC is a member of the tenant relocation team during park closures and meets with tenants providing service referrals to meet the tenants' relocation needs and to educate tenants regarding tenant rights, responsibilities, and the availability of services. MCRC's fundamental commitment is to immediately alert affected state and local agencies (Community Action Agency, Local Housing Bureau, County Assessor, legislators) of the pending park closure, to specifically collaborate and coordinate OHCS resources with the efforts of the lead local agency (LLA).

#### • MCRC Services:

http://www.oregon.gov/ohcs/ Pages/manufactured-dwelling-park-services-oregon.aspx

• ORS Section 446.543:

https://www.oregon.gov/ohcs/ CRD/mcrc/docs/oregon-revised-statute-chapter-446.html

#### • MCRC Closures:

http://www.oregon.gov/ohcs/ pages/manufactured-dwelling-park-closures-oregon.aspx A flow chart reflecting the "Mobile Home Park Closure Response Process" has been included as Appendix D. This chart is intended to provide a visual representation of the current engagement process utilized by MCRC when noticed of a park closure. As prescribed in ORS 90.645, MCRC will support the efforts of the LLA. Should a community determine to adopt the mobile home park Toolkit, MCRC will engage with the lead agency to ensure organized partnership and support within the process (http://www.oregon.gov/ohcs/pages/manufactured-dwelling-park-closures-oregon.aspx).

NOTES		

## Park Closure: What to Do

By this point, the lead agency has identified and initiated communication with regional service providers and assembled regional awareness of the park inventory and objective. The lead agency has also contacted each park owner, gathering and assembling data specific to each park. Parks have been evaluated for potential risk of closure and additional resources and information has been gathered on parks at risk in order to more rapidly respond in the event of a park closure notice having been issued. This section of the toolkit addresses the steps for rapid response to the notice of a specific park closure having been issued. It is important to note that a resident cannot, nor should not, be made to participate in any of the housing counseling sessions, nor should a resident disregard the advice of their own financial or legal counsel. The following resources are suggested and provided in an effort to most effectively provide access for residents to local services and resources.

#### Park Closure: What to Do & Who Should be Involved:

- · Housing counseling agencies
- Oregon IDA provider
- Affordable housing providers
- Local housing authority
- Other MFH park owners/ managers
- Local housing rehabilitation or weatherization staff
- Mobile home movers
- Senior services/disabilities
- · Legal aid
- MCRC

A Park Closure Notice Has Been Issued. How Does the Lead Agency Respond?

- Per statute MCRC is a member of your tenant relocation team; contact MCRC to coordinate your efforts and maximize available resources.
- Initiate Communication with Regional Toolkit Partners and State Agencies
- Initiate Communication with Local Housing Centers; Assemble Housing Counselors
- Schedule Counseling Session with Residents (in partnership with appropriate service providers and partners) to Counsel each resident

Appendix D offers a simplified view of the current MCRC park closure process. MCRC is generally the first governmental entity to be notified of a park closure. MCRC's first act is to immediately notify park residents, alerting them to their statutory rights, subsequently scheduling park meetings to clarify those rights.

Simultaneously, MCRC sends closure notices to more than a dozen local and state agencies, thus beginning the dialogue among local and state service providers. MCRC works with the local jurisdictions to identify the local lead agency (LLA) best suited to initiate those early tenant/service provider park meetings.

MCRC's focus is on **facilitating dialogue between tenants** and local agencies and service providers. MCRC defers to the expertise of the LLA to disseminate requisite social services.

## Initiate Communication and Partner with Regional Housing Centers

Upon receiving notice of a closure, residents will most likely have 365 days until the park closes. The focus will be on identifying their needs, and putting them in touch with local service providers.

Oregon Housing and Community Services designates and funds a network of **Regional Housing Centers (RHCs)** (http://www.oregon.gov/ohcs/HD/SFF/brochures/oregon-housing-centers.pdf) throughout Oregon. All RHCs provide five key services: financial literacy classes and individual counseling, first time homeownership classes and counseling, and foreclosure prevention services. For both geographic reach around the state and experience with financial and housing counseling, the Regional Housing Centers provide a good option for counseling residents who face displacement from a manufactured housing park.

RHCs receive limited funding for these services from OHCS, and may be able to accommodate a small number of displaced residents without additional funding. The closure of a larger park will likely require additional funding to support the client influx and staff time needed. Most RHCs also charge a small fee to the client, to offset the costs of credit reports and materials and to help ensure buy-in from the client.

#### • RHCs:

http://www.oregon.gov/ohcs/ HD/SFF/brochures/oregon-housing-centers.pdf Some RHCs are large **social service agencies** that may have name recognition in the community, but others may not. As a best practice, the counseling agency should be engaged as soon as possible after the pending displacement is identified, and a representative from the agency should be included in early meetings and communication with residents. Residents will need to trust the counseling agency before they will engage in the service, so **the agency should be clearly identified in a resident advocacy/ally role** and be kept somewhat distant from the entities associated with the closure itself. Information and messaging about the counseling service will need to be repeated and reinforced throughout the closure process.

#### Housing Counselors

Housing counselors, especially foreclosure counselors, are adept at helping clients face the realities of a difficult situation. They commonly work with clients who have misconceptions about the reality of their own financial situation or the options available to them. Counselors are often in the role of respectfully but firmly dispelling these misconceptions and should be comfortable talking with clients about the real value of their unit, its ability to be moved, and what the client can afford in terms of future housing options.

Housing counselors are not traditional social service case managers and are not generally responsible for making decisions on behalf of a client or completing steps in the Action Plan on their behalf (such as filling out housing applications, etc.). The intent, instead, is to empower the client with the information and knowledge to make the best decisions for themselves, and connect with the resources they need to take the next steps. If the park residents are a particularly vulnerable population, it might be necessary to bring in a social service partner to complement the work of the housing counselors (such as Senior and Disability Services, etc.).

#### Counseling session with residents

**Step 1:** Housing counselors meet with residents to discuss current resources, goals, financial objectives

Step 2: Residents gather information and documentation

Step 3: Housing counselors meet with residents to discuss options

**Step 1:** An initial housing counseling session generally lasts about 90 minutes, and includes the following core topics:

- financial and/or housing goals,
- credit report review and basic credit counseling,
- · budget counseling,
- · review of debt repayment and savings strategies,
- (for foreclosure counseling) review of potential foreclosure avoidance options,
- · creation of an action plan with next steps, and
- referral to appropriate community resources.

Most counseling agencies will use an Action Plan form to maintain notes throughout the counseling session and outline next steps. The Action Plan is provided to the client at the end of the counseling session. For displaced park residents, the counseling session should follow the basic outline of the "Decision Tree for Displaced MH Park Residents" and will help each resident better understand the realities of their current unit, their financial situation, and which path forward might be best for them.

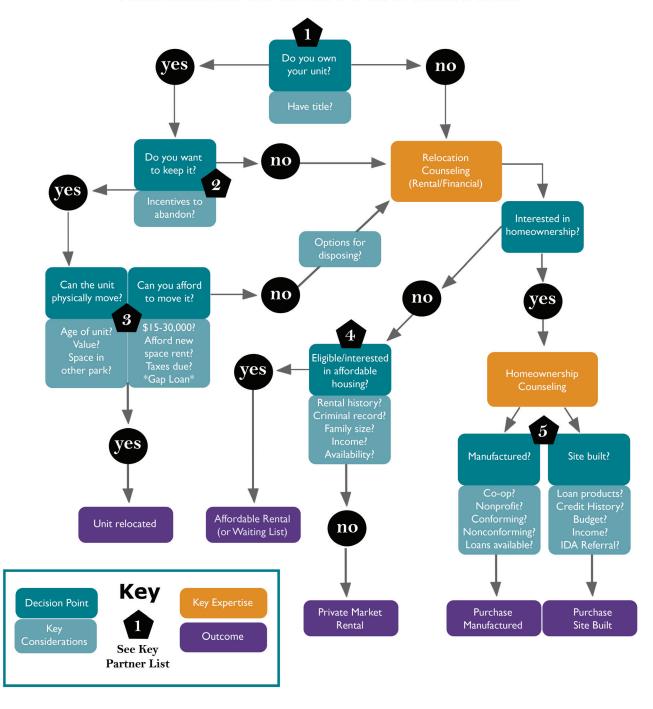
RHC counselors will generally not be experts in the unique features of manufactured housing, and will likely need additional training about topics such as: what variables determine if a unit can be moved, what costs are involved in a move, what the vacancy rates are, and what the move-in requirements are for nearby parks, etc.

Counseling sessions generally require access to a computer and printer, but can be modified to be done entirely without technology. A private space that ensures confidentiality is essential, but could be at the counseling agency, in a community space at the MH park, or at a neutral third location. Counseling at the private residence of clients is strongly discouraged, and most RHCs would not consider it.

**Step 2:** Residents may need to gather information on their own or be prepared prior to the event to be clear on documentation needed.

**Step 3:** Housing counselors discuss options with residents given their particular circumstance, and refer residents to local community resources. The following is a decision tree to assist housing counselors in efforts to guide residents by promoting resources and important referrals to locally identified service providers.

#### Decision Tree for Displaced Manufactured Home Park Residents



## Decision Tree for Displaced Manufactured Home Park Residents **Key Partners**

Partner Description and Resources	General Agency Category
Research/identify owner and title status of units; access to RLID, LOIS, etc.	Cities, realtors, housing developers
Knowledge of energy incentives, etc.	
Knowledge of park space inventory and requirements	Park Owners/Managers
Bids for moving costs, and evaluation of unit's ability to move	Mobile Home Moving Companies
Potential gap loan partners: loan for move, and paid back by owner/state payments (perhaps assignable?)	Credit Union
, , , , , , , , , , , , , , , , , , , ,	CDFI
Affordable housing providers; regional housing waiting list managers	Housing Authority
	Nonprofit Housing Agencies
Housing and service providers for seniors and people with disabilities	
Housing and service providers for formerly incarcerated people	
Financial and housing counseling services	Regional Housing Centers (OHCS designation)
IDA and down payment assistance providers	Oregon IDA Network Partners;
	RHCs; City Housing Depts.
Affordable mortgage lenders; mobile home lenders	
Second chance credit providers	Credit Unions, Local Banks, CDFIs

Referrals to appropriate community resources are a key component of the counseling session, and will likely be especially important for displaced MH park residents. The effectiveness of the referrals will be greatly increased if key service agencies are aware of the park closure, engaged by the lead agency (or another partner) directly in the displacement planning process, and can identify a single point of contact to receive all referrals to their agency. Those points of contact should be made known to the counselors to facilitate smooth and direct referrals.

#### Think about hosting a resource fair

Depending on the size and location of the park closure, the lead agency should consider whether a **community resource fair** or **individual referrals** would be more effective in helping residents connect with services. For larger parks, parks with more vulnerable residents, and/or parks in remote locations without adequate public transportation, a resource fair would bring **key service agencies** to them on a single day. For smaller parks near transportation, a resource fair might not be necessary or efficient for service providers to staff; in that case, counselors can simply make individual referrals (hopefully to a direct point of contact, who is familiar with the general situation).

If a resource fair is planned, the **counseling sessions** should be scheduled either before or the day of the fair. Residents will have a much better sense of the services they need after the counseling session, and will be able to engage with the right service providers in a more productive way. Service agencies should be encouraged to attend the fair ready for **action steps** rather than to simply provide information: with applications available, staff who can make qualification determinations, etc.

#### The Human Toll of Park Closures

The closure and redevelopment of manufactured housing parks reached a peak in Oregon during the last real estate boom, particularly between 2005 and 2007. With the subsequent collapse of the housing market came a brief respite and park closures slowed significantly. Now, as the real estate market heats up, manufactured homeowners are once again faced with the very real threat of park closures as land becomes more valuable repurposed as something other than a manufactured housing park.

In 2007, affordable housing advocates chronicled the experiences of residents like those at the Thunderbird Mobile Club in Wilsonville, OR who faced eviction when their park closed. Some residents had a relatively easy transition to new parks, apartments, or to new cities. Others never really felt at home in their new locations. Virtually all residents experienced a financial loss from the cost of moving their home or from selling under pressure at a loss. From 2003 through 2008, more than 50 Parks and thousands of manufactured homeowners faced a similar fate. Newspaper articles were written, advocates rallied, and new legislation protecting manufactured homeowners was passed.

#### Hindsight is 20/20

Now that we have more **tools** than ever before available to local jurisdictions, it is important to know what a park closure means to residents and be prepared to either **prevent or respond** to these closures.

At Lostinda Woods in Portland, one retired couple with a 3-bedroom manufactured home thought they were well prepared for their retirement, until they faced a closure notice from their new park owner. Although their home appraised for \$55,000, faced with an uncertain and difficult timeline they sold the home for \$25,000. A new manufactured home at another park then cost them \$58,000, not including moving costs. Their total financial loss surpassed \$30,000, resulting in the need for a new mortgage for this couple on a fixed income.

For a disabled veteran living in a manufactured home with his two dogs, an upcoming closure meant having to find a place that would allow his animals to accompany him—a common issue—and somewhere that was also wheelchair accessible. Like most people, he found the prospect of having to move overwhelming, particularly without family and friends nearby to help. For elderly people in fragile health, a move can be devastating. One resident remarked that the closure of her community "shortened many lives."

In a country where many people live paycheck to paycheck, a home represents not only **stability**, but is the primary way most people build **equity**. One of the most effective ways of preserving affordable manufactured housing, as well as to promote secure tenure and encourage wealth-building and asset appreciation via manufactured home ownership is to **facilitate a resident purchase of a park**. And while not every manufactured housing park is destined to be resident or non-profit owned, being prepared, through the collection of information and the development of resources, can mean the difference between living on the streets and landing safely for many manufactured homeowners.

"...being prepared, through the collection of information and the development of resources, can mean the difference between living on the streets and landing safely for many manufactured homeowners."

## Appendix

#### **Appendix Resources**

A. Funding Resources Document	35
B. Housing Counseling Agencies	55
C. Community Action Agencies	56
D. OHCS MCRC Information	56
E. Decision Tree for Displaced Manufactured Home Park Residents	58
F. Additional Information on Program Funding & Training	60
G. Sample Survey Document & Park Assessment Questionnaire	61
H. Declaration of Cooperation	63
I. Glossary	78

### Appendix Resources

A. Funding Resources Document

a. HUD Funding Programsand Applicability toManufactured Home Parks

#### Oregon Field Office Analysis

The US Department of Housing and Urban Development (HUD) is a federal agency that serves as a funder and a regulatory agency. HUD makes grants to state and local government "entitlement communities" and homeless Continuums of Care, provides funding and oversight to Public Housing Authorities, insures mortgages for single family and multifamily homes through the Federal Housing Administration (FHA), provides rental assistance to rental housing owners, and offers competitive grants for a number of housing and community development programs. In fiscal year 2015, HUD funded or guaranteed more than \$3 billion in activity across the state of Oregon. For purposes of this initiative, the Portland HUD Field Office has committed to providing guidance to lead agencies and other organizations working to address distressed Manufactured housing. Please see the Appendix for a detailed analysis from the Portland HUD Field Office on the potential uses of HUD programs to support manufactured housing parks. As lead agencies asses the vulnerabilities of parks and park residents, these agencies should be mindful of federal requirements pertaining to the Fair Housing Act and the Uniform Relocation Act. HUD encourages lead agencies to seek creative ways to use HUD funding programs to meet community goals around this important stock of housing, and HUD also encourages agencies to engage Continuum of Care, Public Housing Authorities, multifamily housing developers, and other HUD-funded entities to develop a coordinated response to atrisk parks.

## Community Development Block Grant (CDBG)

What can CDBG be used for? The program's flexibility allows States and local governments to use CDBG for numerous purposes that can be used for purchase of land, acquisition of property, rehabilitation, infrastructure and other activities. CDBG can be used for grants, loans, loan guarantees, interest subsidies, or other forms of assistance to homeowners for the purpose of repairs, rehabilitation, or reconstruction.

Potential uses for manufactured home parks:

- Purchase or improvement of existing parks: CDBG may be used for infrastructure improvements in existing parks, such as water and sewer improvements (under the Privately Owned Utilities provision). CDBG may also fund the rehab/ repair of existing manufactured homes, or the replacement of manufactured homes to be located on the same building footprint (Rehab and Preservation provision). CDBG funds may be used in a variety of ways to rehabilitate publicly and privately-owned buildings for residential purposes, including manufactured housing that is part of the community's permanent housing stock [24 CFR 570.202]. With CDBG funds providing a grant or a low-interest loan for rehabilitation, affordable housing can be maintained and improved without appreciably increasing an owner's or renter's housing costs. Assistance may also include refinancing, together with rehabilitation, which may have the effect of reducing monthly housing costs [24 CFR 570.202(b)(3)]. **Reconstruction** of residential structures also permits replacing an existing substandard unit of manufactured housing with a new or standard unit of housing, manufactured or otherwise. CDBG may also be used to support local code enforcement in troubled parks.
- **Developing new parks:** CDBG may fund infrastructure improvements—street and sewer lines to new subdivisions,

and site improvements. CDBG cannot be used for new construction of homes, just for the infrastructure piece. If the park will be owned by a nonprofit or a CDBG grantee subrecipient, CDBG may fund the streets or landscaping within the park boundary as well.

- Moving residents or structures: park residents may receive Optional Relocation payments under CDBG. This is distinct from Uniform Relocation Act (URA) requirements that are triggered by federal actions. This is a cumbersome process that requires the local jurisdiction to draft a written plan with public comment and requires equal payments to affected parties. Though CDBG does allow replacement of manufactured homes, it does not allow the replacement of a home in a different location. We are not aware of provisions that would allow CDBG to relocate an existing home to a new site.
- Acquisition of Housing: Grantees and nonprofits may acquire housing units and either lease or sell them for residential purposes [24 CFR 570.201(a) and (b)]. Manufactured homes may also be acquired for this purpose.
- **Homeownership down payment assistance:** CDBG can be used for down payment assistance for home purchases.
- Housing Counseling: A community may support its efforts to expand affordable housing opportunities by operating a housing counseling program under the 10% administrative cap for CDBG. Such a program provides information, advice, and assistance to homebuyers, homeowners, and renters with the goal of preventing loan defaults, foreclosures, or non-payment of rents. The following are examples of housing counseling activities that may be funded with CDBG as public service activities eligible under 24 CFR 570.201(e), provided a national objective is met:
  - ♦ Pre-purchase Housing Counseling: Grantees may fund, as a public service activity, counseling programs for those interested in purchasing a home. The counseling generally consists of information on financial responsibilities, budgeting, housing needs, housing quality, maintenance requirements, and other costs associated with a home purchase.
  - ♦ **Homeownership Counseling:** In a similar way, grantees may carry out homeownership counseling. Here, the

emphasis is on financial management, debt management, and maintenance needs. Included are default counseling, foreclosure prevention counseling, and relocation counseling.

- ♦ **Renter Counseling:** Grantees may provide counseling for delinquent renters, for tenants facing eviction, for landlord and tenant responsibilities, including repair and maintenance issues, and the availability of renter assistance.
- ♦ Emergency Housing Counseling: Housing counseling may be provided for all employees and residents affected, or to be affected, by plant closings and/or acquisitions. 10 Housing counseling is also eligible as part of homeownership assistance program carried out under 24 CFR 570.201(n).

### **Program Considerations:**

- Usage and preference of CDBG funds are dependent on local or state goals—these are good training guides for how CBDG can be used: **Basically CDBG for Entitlements** (https://www.hudexchange.info/resource/19/basically-cd-bg-training-guidebook-and-slides/) & **Basically CDBG** for States (https://www.hudexchange.info/resource/269/basically-cdbg-for-states/).
- CDBG funds are in high demand and budgeting occurs on an annual basis under the jurisdiction's five-year Consolidated Plan. Though activities may be eligible for CDBG, it may be difficult to change priorities to allocate funds to parks in the case of a rapid response need.
- In Balance of State communities, which are funded through the State of Oregon rather than through local entitlement communities, the state has adopted a policy of not allowing rehab of pre-1976 structures.
- Rehab has limitations. However, CDBG repair programs
  offer more flexibility than, for example, the HOME program.
  CDBG may make repairs to specific items, i.e. a water heater,
  whereas HOME requires full rehab to meet HUD property
  habitability requirements. CDBG is not subject to long term
  affordability requirements such as those required by HOME.
- Because CDBG may not be used for new construction, HUD
  would need to determine if building a new park or installing
  a previously manufactured home can be accomplished in an
  eligible category.

### • CDBG for Entitlements:

https://www.hudexchange. info/resource/19/basically-cdbg-training-guidebook-and-slides/

#### • CDBG for States:

https://www.hudexchange.info/resource/269/ basically-cdbg-for-states/

## **HOME**

What can HOME be used for? The program's flexibility allows States and local governments to use HOME funds for grants, direct loans, loan guarantees or other forms of credit enhancements, or rental assistance or security deposits. If in a participating jurisdiction, you apply with the public entity that oversees these funds. If you are not in a participating jurisdiction, then you would apply with the State HOME funder, which in Oregon is through the Oregon Housing & Community Services (OHCS). Potential uses for manufactured home parks:

- Purchase or improvement of existing parks: HOME may be used for the rehab/repair of existing manufactured homes, or the replacement of manufactured homes to be located on the same building footprint. HOME Reconstruction refers to rebuilding a structure on the same lot where housing is standing at the time of project commitment. HOME funds may be used to build a new foundation or repair an existing foundation. Reconstruction also includes replacing a substandard manufactured house with a new manufactured house. During reconstruction, the number of rooms per unit may change, but the number of units may not. TBRA could also be used to provide rental assistance to manufactured home rentals.
- **Developing new parks:** HOME may be used to lay the foundations/footings for parks and for the acquisition and installation of manufactured homes. TBRA could also be used to provide rental assistance to manufactured home renters.
- Moving or relocating residents: HOME Tenant Based Rental Assistance may be used to help residents access new rental housing.
- Homeownership down payment assistance: HOME may be used to provide down payment assistance for homebuyers to purchase manufactured homes.

### **Program Considerations:**

- Usage and preference of HOME funds are dependent on local government or State entity. For example, currently OHCS does not use HOME funds for use in Single Family Housing, as they dedicate these funds to Multifamily housing.
- HUD has a specific policy Notice on HOME and manufactured homes. HUD Notice CPD-03-05 reflects changes made to the HOME regulations since 1996. It was developed to

assist HOME Participating Jurisdictions (PJs) to identify eligible activities involving manufactured housing. Although the notice distinguishes between a manufactured home and a modular home, it only addresses the use of HOME funds for manufactured housing.

- When repairing or replacing a home, the home must meet HUD property standards. All new manufactured housing must meet the construction and safety standards of 24 CFR 3280. New manufactured housing must be installed according to state or local codes or the manufacturer's written instructions. The 2013 Rule requires that newly manufactured housing and housing that replaces an existing substandard unit (under the definition of "reconstruction") must be on a permanent foundation. The definition of "permanent foundation" means a foundation system of supports that is capable of transferring all design loads to the ground and meets the requirements of 24 CFR 203.43f(c) (i). This definition is consistent with the FHA mortgage insurance requirements.
- TBRA can be used to assist renters in a park, provided that the homes meet habitability standards. TBRA requires a tenant selection plan and the jurisdiction must take care to craft a plan that does not single out a specific park; preferences must be carefully crafted.

# Self-Help Homeownership Program (SHOP)

What can SHOP be used for? SHOP can be used for purchase of land and for infrastructure upgrades for homeownership opportunities. SHOP awards grant funds to eligible national and regional non-profit organizations and consortia to purchase home sites and develop or improve the infrastructure needed to set the stage for sweat equity and volunteer-based homeownership programs for low-income persons and families. SHOP funds must be used for eligible expenses to develop decent, safe and sanitary non-luxury housing for low-income persons and families who otherwise would not become homeowners.

SHOP is authorized by the Housing Opportunity Program Extension Act of 1996, Section 11, and is subject to other Federal crosscutting requirements. No separate program regulations exist. All program requirements are listed in the applicable SHOP Notice of Funding Availability (NOFA).

- Eligible Applicants: National and regional nonprofit organizations or consortia with experience in using homebuyer and volunteer labor to build housing may apply for SHOP grants. Applicants must have completed at least 30 units of self-help homeownership housing within the last 24 months. Eligible homebuyers must apply to participate in the SHOP program through a current SHOP grantee (http://portal.hud.gov/hudportal/HUD?src=/program\_offices/comm\_planning/economicdevelopment/programs/shop) or one of their affiliates.
- Application: SHOP grant funds are made available through HUD's annual SHOP NOFA competition. The SHOP NOFA is published on HUD's e-grant portal. Once the NOFA is published, eligible applicants may apply through an e-grant portal (http://www.grants.gov/).
- Eligible Activities: SHOP grant funds can only be used for land acquisition, infrastructure improvements, and administrative costs. Total land acquisition and infrastructure improvement costs cannot exceed an average of \$15,000 in SHOP assistance per unit. Administrative costs cannot exceed 20% of the SHOP grant amount. SHOP grantees must leverage other funds for the new construction or rehabilitation of their SHOP units.

### **Program Considerations:**

It may be possible to use SHOP for the construction of a new manufactured home park that meets the above requirements. Sweat equity requirements may be satisfied by doing administrative work for the non-profit sponsor. New homeowners may need to have fee simple land title or a 99-year lease. The HUD field office does not administer SHOP; the program is run out of HUD Headquarters and awards are made using a NOFA process.

# MULTIFAMILY HOUSING PROGRAMS

# Mortgage Insurance for Manufactured Home Parks: Section 207

What can Section 207 be used for? Section 207 Program insures mortgage loans to facilitate the construction or substantial rehabilitation of multifamily manufactured home parks. Insured mortgages may be used to finance the construction or

### • SHOP grantee:

http://portal.hud.gov/hudportal/HUD?src=/program\_offices/ comm\_planning/economicdevelopment/programs/ shop

• SHOP e-grant portal: http://www.grants.gov/

rehabilitation of manufactured home parks. Home parks must consist of 5 or more spaces. Contractors for new construction and substantial rehabilitation projects must comply with prevailing wage requirements under the Davis-Bacon Act.

- Eligible Borrowers: Eligible mortgagors include investors, builders, developers, cooperatives, and others who meet HUD requirements for mortgagors.
- **Technical Guidance:** Program regulations are in 24 CFR Part 207.33. HUD Handbook 4545.1.

### **Program Considerations:**

In fiscal year 2015, the Department did not insure any mortgages under this section. This program is not available for refinancing parks; rather, it is for construction or substantial rehab of parks. The lack of use of this program means HUD staff would have to be 'trained up' to provide it. Future deals would be processed by the HUD San Francisco office development team.

# Small Multifamily Risk-Share Program

What can SBRS be used for? This new program extends mortgage insurance to 5 to 50 unit properties (loans under \$5 million in high cost areas) using the FHA Risk Share program. Manufactured home parks are an eligible property type under SBRS. Under this program, a private or mission-based lender applies to participate as a HUD counter-party. HUD and a private or mission-based lender share the risk of a loan transaction. Underwriting is delegated to the private or mission-based lender with a limited role for HUD. Loans may be sold to the Federal Financing Bank to free up additional capital for additional loans.

### **Program Considerations:**

This is a brand new program instituted in August 2015. No lenders have yet applied to work in Oregon on Small Multifamily Risk Share.

### SINGLE FAMILY FHA PROGRAMS

# Manufactured Home Loan Insurance (Title I)

What can Title I be used for? This program insures mortgage loans made by private lending institutions to finance the purchase of a new or used manufactured home.

- Type of Assistance: The program insures lenders against loss from default on loans. The buyer must agree to make the required down payment and meet credit guidelines. The interest rate is negotiated between the borrower and the lender. The borrower pays an upfront insurance premium, along with an annual premium based on the declining balance of the loan. The maximum loan term is 20 years for a manufactured housing loan.
- **Eligible Grantees:** Private lending institutions are eligible for insurance on loans made under the program.
- Eligible Customers: All buyers who meet credit requirements and plan to use the manufactured home as their principal place of residence are eligible for the program.
- **Application:** Buyers of manufactured homes may apply for a loan through a HUD-approved lender or through a lender's approved manufactured home dealer.
- **Technical Guidance:** The program is authorized under Title I, Section 2 of the National Housing Act (12 U.S.C. 1703). Program regulations are in 24 CFR Part 201.

### **Program Considerations:**

Dealers often refer customers to lenders they have relationships with who do Title I loans. This is for ownership of a unit in a rental space (or cooperative) park.

# Single-Family Cooperative Mortgage Insurance (203(n))

What can 203(n) be used for? This program insures loans for persons buying a unit in a cooperative housing project.

The basic FHA mortgage insurance program is Mortgage Insurance for One to Four-Family Homes (Section 203(b)), which offers homebuyers lower initial costs and lower down payment requirements, and allows borrowers to fold some of the closing costs into the loan. Section 203(n) is one of several FHA programs based on Section 203(b) that have special features—in this case, financing structured to meet the needs of persons who are buying a corporate certificate and occupancy certificate, the instruments that enable them to own a share of and live in a cooperative housing project.

• **Type of Assistance:** The program insures a loan to purchase an apartment in a residential cooperative—which can be a detached or semidetached building, a rowhouse, or a

multifamily building. Many of the terms of Section 203(n) insurance are the same as those governing basic FHA single-family mortgage insurance. Borrowers can finance 96.5 percent of the price of their cooperative ownership.

- Eligible Grantees: FHA-approved lending institutions can make insured loans under Section 203(n).
- Eligible Customers: All potential owner-occupants who can make the monthly mortgage payments are eligible to apply.
- Technical Guidance: This program is authorized under Section 203(n) of the National Housing Act (12 U.S.C.) and the Emergency Home Purchase Assistance Act of 1974, Public Law 93-449, 88 Stat. 1364. Program regulations are in 24 CFR 203.43c and 203.437.

### **Program Considerations:**

This program is at the option of the borrower, but could be used to own a home in a park that was developed with units in place, rather than just space cooperatives, or rental space.

# Mortgage Insurance for One to Four Family Homes Section 203(b)

What can 203(b) be used for? Through this program, HUD's Federal Housing Administration (FHA) insures mortgages made by qualified lenders to people purchasing or refinancing a primary residence. FHA One to Four Family Mortgage Insurance is still an important tool through which the Federal Government expands homeownership opportunities for first time homebuyers and other borrowers who would not otherwise qualify for conventional mortgages on affordable terms, as well as for those who live in underserved areas where mortgages may be harder to get. These loans can be used for the purchase or refinance of a manufactured home.

- Type of Assistance: This program provides mortgage insurance to protect lenders against the risk of default on mortgages to qualified buyers. Insured mortgages may be used to finance the purchase of new or existing one to four family housing, as well as to refinance debt. Section 203(b) has several important features:
  - ♦ Downpayment requirements can be low. Single family mortgages insured by FHA under Section 203(b) make it possible to reduce downpayments to as little as 3.5 percent.

- ♦ Some fees are limited. FHA rules impose limits on some of the fees that lenders may charge in making a mortgage.
- ♦ HUD sets limits on the amount that may be insured. The current FHA mortgage limit can be found online at HUD's website and can vary depending on geographic location.
- ♦ Fee simple or leaseholds of at least 10 years more than the duration of the mortgage qualify.
- Eligible Participants: FHA-approved lending institutions, such as banks, mortgage companies, and savings and loan associations, can make insured Section 203(b) mortgages.
- Eligible Customers: Anyone intending to use the mortgaged property as their primary residence is eligible to apply and be considered for an FHA insured mortgage through FHA approved lenders. The program is limited to owner occupants. Applications are made through an FHA-approved lending institution.
- Technical Guidance: This program is authorized under Section 203, National Housing Act (12 U.S.C. 1709 (b), (i)). Program regulations are in 24 CFR Part 203. Handbook 4000.1.

### **Program Considerations:**

This program is only available where ownership is in fee simple or leasehold extending at least 10 years beyond the term of the mortgage. Sub-leaseholds are not eligible. Condominiums can be insured under this program.

# Section 8 Housing Choice Vouchers

What can Section 8 Housing Choice Vouchers be used for? Section 8 Housing Choice Vouchers can be used to subsidize the rent for a person who rents a manufactured home. The unit must meet Housing Quality Standards. Under the Section 8 homeownership program, they can also be used to allow a person to buy a unit in a cooperative or condominium project.

### **Program Considerations:**

The voucher holder has the sole discretion to locate their unit in the general market. Homeownership vouchers are at the discretion of the Public Housing Authority. A PHA may institute Section 8 waiting list preferences. **Project–Based Vouchers**  are not allowed for use in manufactured housing by 24 CFR 983.53(a)(5).

#### Relocation

The use of Federal resources to close, redevelop, or reconstitute a manufactured housing park may trigger benefits under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

# b. USDA Rural Development Programs and Applicability to Mobile Home Parks

# USDA Rural Development in Oregon

The U.S. Department of Agriculture (USDA) Rural Development offers financial and technical assistance to increase economic opportunity and improve the quality of life in rural America. As the lead Federal agency for rural development needs, USDA Rural Development helps rural communities grow and prosper by working with communities to build and improve:

- · Housing,
- Water and wastewater systems,
- Cooperatives,
- Business start-up and expansion,
- Job access,
- Renewable energy systems,
- Essential community facilities,
- Electric and telecommunications services,
- And more.

Rural Development partners with community leaders; developers; state, local and tribal governments; private and nonprofit organizations; user-owned cooperatives; and a nationwide network of participating lenders to multiply local investments and target more resources to rural people and communities.

Rural Development administers more than 40 loan, grant, and technical assistance programs. Many of these programs give priority to very small communities, underserved groups, and economically distressed areas. Assistance is available to applicants in areas designated as "rural." The definition of rural, under law, is different for each program.

Below is a summary of programs that have been or could be used to assist communities addressing needs related to mobile home parks.

# Cooperative Development Assistance

A cooperative, or co-op, is a business owned and controlled by the people who use its services. USDA helps rural residents form new cooperatives and improve the operations of existing ones through technical assistance grants administered by approved cooperative development assistance providers. In addition to other types of cooperatives, USDA supports the development of housing cooperatives in eligible rural areas through the Rural Cooperative Development Grant Program.

In Oregon, Community And Shelter Assistance Corporation of Oregon (CASA of Oregon) receives USDA grant funding to help establish resident-owned mobile home park co-ops and to provide ongoing technical assistance and training to ensure their continued success. For more information, visit www.casao-foregon.org.

Water and Wastewater Infrastructure Loans and Grants

USDA's Water and Wastewater Disposal Loan and Grant Program provides funding for clean and reliable drinking water systems, sanitary sewage disposal, sanitary solid waste disposal, and storm water drainage for households and businesses in eligible rural areas.

- Who may apply? This program assists qualified applicants that are not otherwise able to obtain commercial credit on reasonable terms. Eligible applicants include most state and local governmental entities; private nonprofits, which may include nonprofit housing cooperatives; and federally-recognized tribes.
- What is an eligible rural area? Areas that may be served include rural areas and towns with fewer than 10,000 people.
- What kinds of funding are available? The program offers long-term, low-interest loans; if funds are available, grant funds may be combined with a loan if necessary to keep user costs reasonable.
- **How may the funds be used?** Funds may be used to finance the acquisition, construction, or improvement of:
  - ♦ Drinking water sourcing, treatment, storage, and distribution;

• CASA: www.casaoforegon.org

- ♦ Sewer collection, transmission, treatment, and disposal;
- ♦ Solid waste collection, disposal, and closure; or
- ♦ Storm water collection, transmission, and disposal.
- What is the loan term and rate? Borrowers may request up to a 40-year payback period based on the useful life of the facilities financed. Interest rates are fixed based on the need for the project and the median household income of the area to be served.
- Are there additional requirements? Borrowers must have the legal authority to construct, operate, and maintain the proposed services or facilities. All facilities receiving federal financing must be used for a public purpose. Partnerships with other federal, state, local, private, and nonprofit entities that offer financial assistance are encouraged. Projects must be financially sustainable.
- How do we get started, and who can answer questions? Applications for this program are accepted through your local offices year-round. Program resources are available online, including forms, guidance, certifications, etc. Contact the local USDA Rural Development representative who serves your area for more information: http://www.rd.usda.gov/programs-services/water-waste-disposal-loan-grant-program/or

### Water and Wastewater Disposal Loan and Grant Program:

http://www.rd.usda.gov/programs-services/water-wastedisposal-loan-grant-program/ or

# Single Family Home Loans

USDA Rural Development provides low-interest, fixed-rate homeownership loans directly to qualified individuals. Financing is also offered for qualified individuals at fixed rates and terms through loans provided by private financial institutions and guaranteed by Rural Development. Neither one of these home loan programs require a down payment. Mobile home park residents may qualify for USDA financing to purchase a manufactured or site-built home on a lot they own outside of a mobile home park. In limited situations, USDA may be able to provide financing for an eligible homebuyer to purchase a newly built, energy efficient manufactured home in a resident-owned mobile home cooperative that is willing to adopt certain lease addendums.

### **Single Family Housing Direct Home Loans**

• What does this program do? Also known as the Section 502 Direct Loan Program, this program helps low- and very-low-income applicants obtain decent, safe, and sanitary

housing in eligible rural areas by providing payment assistance to increase an applicant's repayment ability. Payment assistance is a type of subsidy that reduces the mortgage payment for a short time. The amount of assistance is determined by the adjusted family income.

- Who may apply for this program? A number of factors are considered. At a minimum, interested applicants must have an adjusted income that is at or below the applicable low-income limit for the area where they wish to buy a house and they must demonstrate a willingness and ability to repay debt. Applicants must:
  - ♦ Be without decent, safe, and sanitary housing;
  - ♦ Be unable to obtain a loan from other resources on terms and conditions they can reasonably be expected to meet;
  - ♦ Agree to occupy the property as their primary residence;
  - ♦ Have the legal capacity to incur a loan obligation;
  - ♦ Meet citizenship or eligible noncitizen requirements;
  - ♦ Not be suspended or debarred from participation in federal programs; and
  - ♦ For a direct loan, meet income eligibility requirements.

In addition, properties financed with direct loan funds must:

- $\Diamond$  Generally be 2,000 square feet or less;
- ♦ Not have a market value in excess of the applicable area loan limit;
- ♦ Not have in-ground swimming pools; and
- $\Diamond$   $\,$  Not be designed for income producing activities.

Additional considerations for manufactured homes include:

- ♦ The home must be new construction built by an approved manufacturer.
- ♦ The home must be located on land owned by the homeowner or for which the homeowner has a long-term lease arrangement for a duration that is at least 150 percent of the loan term for USDA direct loans or at least two years longer than the loan term for USDA guaranteed loans. (Additional processes are under development by USDA to finance new manufactured homes in resident-owned mobile home parks that are willing to adopt certain lease addendums).

- ♦ The home and foundation must be built to applicable codes and program regulations.
- ♦ The home must meet Energy Star efficiency standards.

Borrowers are required to repay all or a portion of the payment subsidy received over the life of the loan when the title to the property transfers or the borrower is no longer living in the dwelling.

- What is an eligible area? Generally, rural areas with a population of less than 35,000 are eligible. Visit the USDA Income and Property Eligibility website for complete details: http://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do.
- How may funds be used? Loan funds may be used to help low-income individuals or households purchase homes in rural areas. Funds can be used to build, repair, renovate, or relocate a site-built home, or to purchase and prepare sites, including providing water and sewage facilities. Manufactured homes must be new construction to qualify for USDA financing.
- How much may I borrow? The maximum loan amount an applicant may qualify for will depend on the applicant's repayment ability. Determination of the applicant's ability to repay a loan involves various factors, such as income, debts, assets, and the amount of payment assistance applicants may be eligible to receive. Regardless of repayment ability, applicants may never borrow more than the area's loan limits (plus certain allowed costs) for the county in which the property is located.
- What is the interest rate and payback period? Interest rates are fixed based on current market rates at loan approval or loan closing, whichever is lower. The interest rate, when modified by payment assistance, can be as low as 1 percent. The payback period may be up to 33 years, or 38 years for very-low-income applicants who can't afford the 33-year loan term.
- How much down payment is required? No down payment is typically required. Applicants with assets higher than the asset limits may be required to use a portion of those assets.
- How do we get started, and who can answer questions? Applications for this program are accepted year-round. Contact USDA Rural Development for more

• Single Family Direct:
http://eligibility.sc.egov.usda.
gov/eligibility/welcomeAction.
do

information: http://www.rd.usda.gov/programs-services/single-family-housing-direct-home-loans/or.

### Single Family Housing Guaranteed Loan Program

- What does this program do? This program assists approved lenders in providing low- and moderate-income households with the opportunity to own adequate, modest, decent, safe, and sanitary dwellings as their primary residence in eligible rural areas. Eligible applicants may build, rehabilitate, improve, or relocate a dwelling in an eligible rural area. The program provides a 90 percent loan note guarantee to approved lenders in order to reduce the risk of extending 100 percent loans to eligible rural homebuyers.
- Who may apply for this program? Applicants must:
  - ♦ Meet income eligibility requirements;
  - ♦ Agree to personally occupy the dwelling as their primary residence;
  - ♦ Be a U.S. Citizen, U.S. non-citizen national, or Qualified Alien;
  - ♦ Have the legal capacity to incur the loan obligation;
  - ♦ Have not been suspended or debarred from participation in federal programs;
  - ♦ Demonstrate the willingness to meet credit obligations in a timely manner; and
  - ♦ Purchase a property that meets all program criteria.
- What is an eligible area? Generally, rural areas with a population of less than 35,000 are eligible. Visit the USDA Income and Property Eligibility website for complete details: http://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do.
- How may funds be used? Eligible use of funds backed by a USDA loan guarantee include:
  - ♦ Purchase of new or existing residential property to be used as a permanent residence. Closing costs and reasonable/customary expenses associated with the purchase may be included in the transaction.
  - ♦ Purchase a site with a new or existing dwelling, along with site preparation costs.
  - ♦ Repair and rehabilitate a property when associated with the purchase of an existing dwelling, install accessibility

• Single Family Direct:
http://www.rd.usda.gov/programs-services/single-family-housing-direct-home-loans/
or

• Single Family Guaranteed: http://eligibility.sc.egov.usda. gov/eligibility/welcomeAction. do

- features to accommodate a household member who has a physical disability, purchase essential household equipment, and install energy efficiency measures.
- ♦ Pay for reasonable and customary connection fees, assessments, or the pro rata installment cost for utilities, such as water, sewer, electricity, and gas, for which the buyer is liable.
- How do we get started, and who can answer questions? Applicants must contact an approved lender. Applicants can review a partial list of approved lenders, and information about all of the approved lenders in your state can be obtained by contacting your state's Guaranteed Loan Coordinator: http://www.rd.usda.gov/programs-services/single-family-housing-guaranteed-loan-program/or

# Single Family Home Repair Loans and Grants

- What does this program do? Also known as the Section 504 Home Repair Program, this program provides loans to very-low-income homeowners to repair, improve, or modernize their homes, and it provides grants to elderly very-low-income homeowners to remove health and safety hazards. All critical home repair issues must be addressed at the time project using USDA funds alone or in combination with the homeowner's funds and/or other resources.
- Who may apply for this program? To qualify, applicants must:
  - ♦ Be the homeowner and occupy the house;
  - ♦ Be unable to obtain affordable credit elsewhere;
  - ♦ Have a family income below 50 percent of the area median income; and
  - ♦ For grants, be age 62 or older and not be able to repay a repair loan.
- What is an eligible area? Generally, rural areas with a population of less than 35,000 are eligible. Visit the USDA Income and Property Eligibility website for complete details: http://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do.
- How may funds be used? Loans may be used to repair, improve, or modernize homes or remove health and safety hazards. Grants must be used to remove health and safety hazards.

• Single Family Guaranteed:

http://www.rd.usda.gov/ programs-services/single-family-housing-guaranteed-loan-program/ or

• Single Family Home Repair: http://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do

- How much money can I get? The maximum loan is \$20,000, and the maximum grant is \$7,500. Loans and grants can be combined for up to \$27,500 in assistance.
- What are the terms of the loan or grant? Loans can be repaid over 20 years. The loan interest rate is fixed at 1 percent. Full title service is required for loans of \$7,500 or more. Grants have a lifetime limit of \$7,500. Grants must be repaid if the property is sold in less than three years. If applicants can repay part but not all of the costs, applicants may be offered a loan and grant combination.
- How do we get started, and who can answer questions? Applications for this program are accepted year-round. Contact USDA Rural Development for more information: http://www.rd.usda.gov/programs-services/single-family-housing-repair-loans-grants/or.

# Multi-family and Farm Labor Housing Construction and Rehabilitation Financing

Communities facing the closure of mobile home parks may want to develop affordable housing plans that include the addition of new multi-family housing facilities. USDA Rural Development administers financing programs to assist in the development or rehabilitation of affordable and moderate-income multi-family housing.

- What do these programs do? These programs provides competitive financing options for affordable multi-family rental housing for low-income, elderly, or disabled individuals and families in eligible rural areas, as well as housing for farmworkers and their families. USDA Rural Development also offers a loan guarantee to qualified private-sector lenders to provide financing to qualified borrowers to increase the supply of affordable rental housing for low- and moderate-income individuals and families in eligible rural areas.
- Who may apply? This program assists qualified applicants that cannot obtain commercial credit on terms that will allow them to charge rents that are affordable to low-income tenants. Qualified applicants include:
  - ♦ Individuals, trusts, associations, partnerships, limited partnerships, nonprofit organizations, for-profit corporations, and consumer cooperatives;
  - ♦ Most state and local governmental entities; and
  - ♦ Federally-recognized tribes.

• Single Family Home Repair: http://www.rd.usda.gov/programs-services/single-family-housing-repair-loans-grants/ or. Borrowers must have the legal authority needed to construct, operate, and maintain the proposed facilities and services. Loan guarantees may be made for lenders approved and active in one of the following programs: Fannie Mae, Freddie Mac, Ginnie Mae, HUD, Federal Home Loan Bank members, or state or local housing finance agencies.

- What is an eligible area? Rural Development housing programs are generally available in rural areas and towns with 35,000 or fewer people and on federally-recognized tribal lands. Rural Rental Housing direct financing is further limited to a list of designated eligible places determined by the Rural Development state office for each application cycle. Farm Labor Housing may be constructed in urban or rural areas, as long as there is a demonstrated need.
- How may funds be used? Construction, improvement, and purchase of multi-family rental housing are primary loan purposes. Funding may also be available for related activities, including buying and improve land, and providing necessary infrastructure.
- Who can answer questions? Contact USDA Rural Development to learn more: http://www.rd.usda.gov/programs-services/multi-family-housing-direct-loans/or.

### **Multi-family Housing Rental Assistance**

- What does this program do? This program provides payments to owners of USDA-financed Rural Rental Housing or Farm Labor Housing projects on behalf of low-income tenants unable to pay their full rent.
- How may funds be used? Payments are made on behalf of the tenants and become part of the property's income, which pays operational expenses.
- What renters may receive assistance? Low- or very-lowincome tenants may qualify to receive Rental Assistance to reduce the cost of living in apartments at USDA-financed Rural Rental Housing and Farm Labor Housing properties.
- What is an eligible area, and where can renters apply for housing supported by USDA Rental Assistance? Rental Assistance can only be provided to eligible renters living in existing USDA-financed Rural Rental Housing and Farm Labor Housing properties. Many facilities have a waiting list for eligible units, and Rental Assistance is

 Multi-family and Farm Labor Financing:

http://www.rd.usda.gov/ programs-services/multi-family-housing-direct-loans/ or available only for a designated number of households at each facility. Interested renters should inquire with the apartment management company for those facilities in which they are interested regarding availability. These USDA-financed facilities may be located online: http://rdmfh-rentals.sc.egov.usda.gov/RDMFHRentals/select\_county.jsp?st=OR&state\_name=Oregon&st\_cd=41.

• Multi-family Housing Rental Assistance:

http://rdmfhrentals.sc.egov. usda.gov/RDMFHRentals/ select\_county.jsp?st=OR&state name=Oregon&st\_cd=41

Other financing resources for manufactured housing park purchases (not an exhaustive list):

Loans & Resources	Resident-owned Cooperatives	Non-profits
Pre-development loans: CASA of Oregon	✓	
Permanent loans: Network for Oregon Affordable Housing	<b>≠</b>	<b>≠</b>
Banner Bank	<b>✓</b>	<b>4</b>
ROC Capital	<b>≠</b>	
CASA of Oregon	<b>✓</b>	
Subsidy: (subject to availability): Oregon Affordable Housing Tax Credits	<b>✓</b>	<b>✓</b>
Oregon Housing and Community Services Grants	<b>✓</b>	✓

# B. Housing Counseling Agencies

To search for approved housing counseling agencies in your community, you may use both the HUD-approved Housing Counseling search tool and also the Oregon Housing & Community Services – Oregon Homeownership Center search tools to search to find potential partners in working to assist manufactured home parks residents with rental counseling, homeownership counseling, and other services:

# • HUD-approved Housing Counseling:

http://www.consumerfinance.gov/find-a-housing-counselor/

# • Oregon Homeownership Centers:

https://www.oregonhomeownersupport.gov/en/ search-counselors

• Community Action
Agencies: http://www.
caporegon.org/our-network/
members

- Search tool for HUD-approved Housing Counseling: http://www.consumerfinance.gov/find-a-housing-counselor/
- Search tool for Oregon Housing & Community Services

   Oregon Homeownership Centers: https://www.oregon-homeownersupport.gov/en/search-counselors

# C. Community Action Agencies

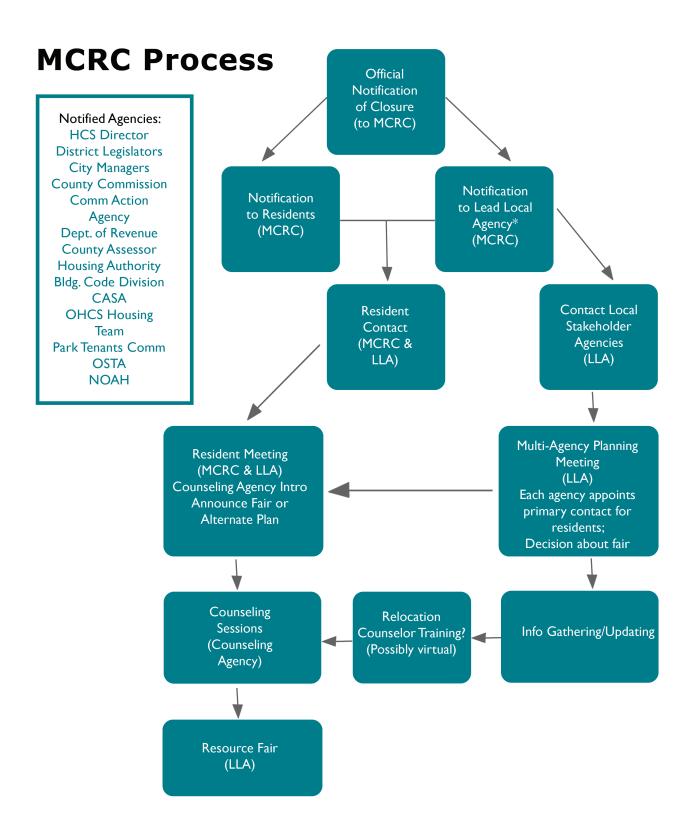
To search for Community Action Agencies in your community, you can use this search tool from the Community Action Partnership of Oregon (CAPO) to find the entity in your community who may be able to assist with various services for manufactured home park residents:

• Search tool for Community Action Agencies of Oregon in your County: http://www.caporegon.org/our-network/members

### D. OHCS MCRC Information

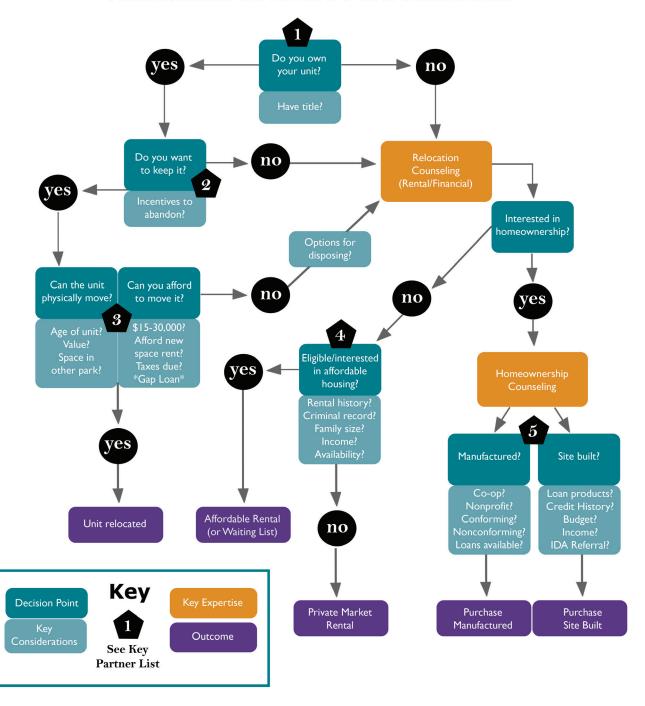
Facilitate communication with requisite agencies (environments of closure or sale).

Mobile Home Park Closure Response Process:



# E. Decision Tree for Displaced Manufactured Home Park Residents

## Decision Tree for Displaced Manufactured Home Park Residents



# **Key Partners** for Displaced Manufactured Home Park Residents

Partner Description and Resources	General Agency Category
Research/identify owner and title status of units; access to RLID, LOIS, etc.	Cities, realtors, housing developers
Knowledge of energy incentives, etc.	
Knowledge of park space inventory and requirements	Park Owners/Managers
Bids for moving costs, and evaluation of unit's ability to move	Mobile Home Moving Companies
Potential gap loan partners: loan for move, and paid back by owner/state payments (perhaps assignable?)	Credit Union
, , , , , , , , , , , , , , , , , , , ,	CDFI
Affordable housing providers; regional housing waiting list managers	Housing Authority
	Nonprofit Housing Agencies
Housing and service providers for seniors and people with disabilities	
Housing and service providers for formerly incarcerated people	
Financial and housing counseling services	Regional Housing Centers (OHCS designation)
IDA and down payment assistance providers	Oregon IDA Network Partners;
	RHCs; City Housing Depts.
Affordable mortgage lenders; mobile home lenders	
Second chance credit providers	Credit Unions, Local Banks, CDFIs

# F. Additional Information on Program Funding & Training

- Statewide organizations should seek funding to support development of housing counselor training to prepare counseling agencies to address unique needs of park closures and resident needs.
- Collaborative members should seek ways to **train local agencies on the toolkit** and work with public agencies at the state and federal level to publicize the tools.
- Work with leaders throughout Oregon to identify and secure potential funding programs to assist with the purchase and improvement of the parks or to rebuild low cost MH parks and relocate residents as may be necessary.

# G. Sample Survey Document & Park Assessment Questionnaire

## **Sample Survey Document:**

Date

Park owner Street Address City, State, Zip Code

To Whom it May Concern

The City of Springfield

We request that you please take a few minutes to complete the attached questionnaire in order to better help us inventory existing mobile and manufactured home parks within the Springfield community. Our goal is to better understand the characteristics of all mobile and manufactured home park communities in Springfield. We desire to be responsive to, and proactive in, discussing future potential needs of your park and residents. We would be happy to schedule a time for our staff to meet with you, and walk through the questionnaire and answer any of your questions.

Any responses you can provide, to the best of your ability, will be included in our citywide inventory. We anticipate updating this inventory every 3-5 years. There are no fees associated with this inventory, and we hope that you will take the opportunity at the end to let us know how we might be able to better support and aid your park and residents.

We understand that you may have questions about our request for information specific to your park and the intended use of the information. We are most concerned with our ability to serve our community, which includes park owners and residents. For your convenience, included in this packet is an informational sheet of potential resources and agencies that may be of interest to you and/or your residents. Please do not hesitate to contact us at [phone number] or [email] with any questions you may have regarding this questionnaire or to schedule a time to meet with our staff.

Sincerely

Mayor Christine Lundberg City of Springfield

# Park Assessment Questionnaire:

## Park Assessment Questionnaire

Please confirm the below information pertaining to name, ownership, and contact information for your park is correct. Please complete information where none is indicated.

[INSERT PARK NAME HERE] [INSERT REGISTERED OWNER NAME HERE] [INSERT PROPERTY OWNER MAILING ADDRESS HERE] [INSERT ONSITE PROPERTY MANAGER CONTACT NAME AND INFORMATION HERE]
Name:
Email:
Mailing Address:
Phone Number:
Preferred method of contact:
Please select all that apply to the organization/individual which owns [INSERT PARK NAME HERE].  Registered Non-Profit Organization  Organization/Individual Also Owns Park(s) in Other Locations
My park is currently connected to:City Sanitary Sewer Private Septic System
If your park is connected to a private septic system, when was the last known date of service to this system (approximate)? Do you know of any upgrades to the system?
Please describe the general state of this system, including any trouble with water quality or effluent:
Do you anticipate any significant upgrades or investments to the system in the next 12 Months 2-5 Years I do not anticipate any upgrades or investments to the system.
What is the total number of mobile home and/or RV spaces in your park?
As of today, how many of these spaces are occupied?
What number of occupied spaces are residents who own their home?
Are you accepting new/used structures in your park?Not accepting unitsYes, accepting both new and usedYes, but only accepting new units
If you answered "yes" to used structures, what restrictions do you place on structures looking to move into your park? Please describe:
Has the park received any notice or communication from the Department of Environmental Quality while under your ownership?NoYes If yes, what was the date of this contact?

# H. Declaration of Cooperation

# DECLARATION OF COOPERATION

Springfield Manufactured Home Park Solutions Collaborative Roaring Rapids Pizza, 4006 Franklin Boulevard Eugene, Oregon 97403 September 15, 2016, 1:15pm

## **Project Summary**

The City of Springfield took a proactive approach to better prepare their community to aid vulnerable mobile park residents by developing a coordinated housing and social service assistance response plan to channel resources and services to residents facing dislocation resulting from park closures. This project includes an action plan and "tool kit" enabling a jurisdiction faced with notice of a park closure to provide a comprehensive listing of relocation options and assistance.

## Project Background

The City of Springfield initiated stakeholder meetings with assistance from Oregon Solutions and the South Valley / Mid Coast Regional Solutions Center. These conversations resulted in the desire for an impartial collaborative approach to assisting residents, owners and renters, living in mobile home parks who risk being evicted or displaced as a result of redevelopment pressures or other circumstances outside of their control. Following a request by the City of Springfield, the project sponsor, Oregon Solutions completed its assessment and asked that the "Manufactured Home Park Solutions Collaborative" be designated an Oregon Solutions project. On December 11, 2015, Governor Brown designated the collaborative an Oregon Solutions project and selected Springfield Mayor Christine Lundberg; and, Vicki Walker, Oregon State Director as the co-conveners.

Springfield is one example of an Oregon community grappling with a large population of manufactured home park residents (estimated 1,400 households) facing a strong risk of displacement. Neither the local governments nor regional service providers are currently equipped to meet the difficult challenge of sufficiently serving displaced residents, helping them find new housing. The Oregon Solutions process was utilized to develop

a housing and social service assistance response which is coordinated and ready for implementation. A formal action plan and "tool kit" enables a jurisdiction faced with notice of park closure to provide relocation options, such as a "decision tree", which would help local communities understand what opportunities might be available to improve or replace homes or park infrastructure, move homes to new sites, or provide assistance in relocation or housing searches for park residents.

Additionally, the Oregon Field Office of the US Department of Housing and Urban Development has designated Springfield and Eugene as the focus of its two-year Community Needs Assessment program. As part of this initiative, HUD has identified distressed manufactured home parks as a key engagement area. Similarly, the South Willamette Valley/Mid-Coast Regional Solutions Advisory Committee designated the project of addressing manufactured home park issues within the region as a Regional Solutions' priority.

## Project Description/Objectives

A collaborative to identify opportunities and resources available to rapidly respond to park closures, or other similar emergencies, and to provide residents assistance in relocation or housing searches through the development of a coordinated housing and social service decision making and engagement process. The process creates a structure for coordinated communication between impacted residents, local decision makers and service providers. The participants in the collaborative have worked to make their work products transferable throughout Oregon.

# Springfield Manufactured Home Park Solutions Collaborative Team Commitments

The commitments represented in the following pages form a public statement of intent to participate in the project, to strive to identify opportunities and solutions whenever possible, to contribute assistance and support within resource limits, and to collaborate with other team members in promoting the success of the project. All team members acknowledge the best solutions depend upon cooperation by all entities at the table. Accordingly, they recognize each party has a unique perspective and contribution to make, and legitimate interests to be taken into account for the project's success. It is recognized by all parties to this agreement that any final products will require additional refinement and updating by community partners and respective agencies.

This Declaration of Cooperation, while not a binding legal contract, is evidence to and a statement of the good faith and commitment of the undersigned parties. The undersigned parties to this Declaration of Cooperation have, through a collaborative process, agreed and pledged their cooperation to the following findings and actions:

## The City of Springfield

Springfield is a family-friendly community where a healthy economy and numerous historical aspects of Oregon's past have blended into a vibrant place to call home. With a population of just over 60,000 (2013), it is located in the Southern Willamette Valley within Lane County, and is part of the Eugene-Springfield Metropolitan Statistical Area. Springfield stepped up to meet the difficult challenge shared by many Oregon communities grappling with the serious consequences of residents facing displacement. Communities are often ill-equipped to sufficiently serve displaced residents in finding new housing after a park closure. Led by Mayor Christine Lundberg, Springfield decided to work collaboratively to bring together partners to help local communities understand what opportunities might be available to improve or replace homes or park infrastructure, to move homes to new sites, or to provide assistance in relocation or housing searches for park residents. With this in mind, the City of Springfield commits to:

- Support project funding through agreement-seeking with other project stakeholders, granting agencies, and private parties.
- Participate in public events, conferences and presentations to help promote the project as resources allow.
- After using the toolkit and completing an initial community-wide park assessment, provide feedback on how it can be updated to better serve constituents facing displacement.
- Provide leadership for a re-convening of the Oregon Solutions Project Team within the next 9 to 12 months to help evaluate the success of the project objectives and its implementation; and, the progress made toward the commitments contained in this document.

Signed: Christin Lundberg 9/15/2016

Mayor Christine Lundberg

Mayor Christine Lundberg

## **USDA** Rural Development

USDA Rural Development Housing Programs provide critical support that may otherwise be unavailable for families and communities to grow and thrive in Oregon. We accomplish this through the delivery of affordable, long-term loans, loan guar-antees, and grants to individuals.

- USDA Rural Development in Oregon commits funding for the development of a "Manufactured Home Park Toolkit" publication using content provided by the Collaborative.
- USDA Rural Development provides grant funds to CASA
  of Oregon to support the development of resident-owned
  manufactured housing cooperatives through the Rural
  Cooperative Development Grant Program.
- Additionally, USDA Rural Development offers Single Family Housing direct and guaranteed loans to finance principal residences for eligible residents who want to replace their substandard or obsolete manufactured homes with safe and energy efficient manufactured or site-built homes in eligible rural areas.
- USDA's Single Family Housing Home Repair loans and/or grants enable eligible households to make needed repairs or accessibility and safety improvements to their existing single family homes.
- USDA Rural Development also administers a suite of Multifamily Housing Programs to finance the construction and rehabilitation of affordable rental housing in rural areas. Our portfolio includes 200 properties providing more than 6,000 affordable housing units in rural Oregon. The USDA Rural Development program subsidizes rents for low-income tenants who cannot afford to pay their full rent in these facilities.

All funding is subject to availability of funds and current agency regulations, policy, and guidelines.

9/15/16

Vicki L. Walker, Oregon State Director

Vicki L. Walker Oregon State Director

# US Department of Housing and Urban Development:

As a federal agency with the mission to create strong, sustainable, inclusive communities and quality affordable homes for all, the US Department of Housing and Urban Development's Oregon Field Office will:

- Work with Collaborative partners to publicize and amplify the Manufactured Home Solutions Toolkit to HUD grantees and the broader housing arena across Oregon;
- Provide updates to the Toolkit and related resource documents to reflect changes in HUD grant, loan or subsidy programs that may be used to address Manufactured Home Parks and/or to assist impacted residents;
- Contribute staff time to assist local agencies seeking to use HUD funding programs to address manufactured home parks or assist manufactured home park residents;
- As appropriate, share challenges and best practices from Oregon with HUD leaders at the regional and national level to influence policy discussions on manufactured housing.

Signed: Margaret Salazar, Portland Field Office Director Date

Margaret Salazar Portland Field Office Director

### Oregon Housing & Community Services:

On behalf of the State of Oregon, Oregon Housing & Community Services will:

- Continue to provide innovation, direction, technical expertise, and advocacy to this effort through the Manufactured Communities Resource Center and the Statewide Housing Plan;
- Serve as the repository of the "Toolkit" manual; and, as resources allow, assist with updating and maintaining the document so that it can be shared with other Oregon communities;

• Pursue, as possible, State of Oregon objectives of job creation, retention, and innovation; healthy people; safe and healthful housing, and healthy environment.

Claire Seguin, Interim Director Oregon Housing & Community Services Date

Claire Seguin Interim Director

# Community and Shelter Assistance Corp. (CASA of Oregon)

CASA of Oregon is a statewide organization committed to the preservation of affordable manufactured housing through the establishment of resident-owned cooperatives. CASA of Oregon will:

- Provide technical expertise around manufactured housing preservation via resident-owned cooperatives
- Contribute the time and effort of the Manufactured Housing Cooperative Development Director
- Serve as a liaison between the collaborative and national non-profits working on manufactured housing policy and advocacy issues
- Share knowledge from the field
- Promote the toolkit amongst local and national partners with whom we work

Signed: .

-8----

Chelsea Catto

Program Director

Manufactured Housing Cooperative Development

Chelsea Catto Program Director

## Springfield Alliance for Equality and Respect

The Springfield Alliance for Equality and Respect (SAfER) a program of Community Alliance of Lane County (CALC) is a community advocacy nonprofit group concerned with human rights, including shelter rights.

In support of achieving the Springfield Manufactured Home Park Solutions Collaborative vision, The Springfield Alliance for Equality and Respect will commit to:

• Continue to stay engaged with the Oregon Solutions project and the City of Springfield as a resource and voice for low income residents. While we are not a social service agency, we do have an on line newsletter which can distribute information about the toolkit, rights of residents and other public information generated by the project.

Signed: <sub>-</sub>		 	 	 _
Date:	 	 	 	
_				

Rev. June Fothergill

# Network for Oregon Affordable Housing (NOAH)

NOAH is a non-profit Community Development Financial Institution committed to financing affordable housing throughout Oregon. NOAH has both the resources and expertise to support communities as they meet the needs of low income citizens. Thus, with respect to closure of manufactured home communities, NOAH commits to:

- Continue active participation with the workgroup and its members to address challenges faced by communities and residents from manufactured home park closures;
- Promote the toolkit through presentations and web site links;
- Advocate for resources to support residents and communities affected by closures;

In addition to the above closure-related activities, NOAH commits to focus resources and expertise to prevent closure of parks wherever possible by:

 Providing both acquisition and permanent financing for the acquisition of manufactured home parks by residents, public housing authorities, or non-profit organizations committed to supporting the needs of residents;

- Providing financing for infrastructure improvements so parks can remain operable;
- Convening and staffing an ongoing committee of stakeholders to coordinate efforts to preserve existing parks, develop new communities, and advocate for policy and resources to support manufactured home communities in Oregon;
- Develop an internet library of information related to financing programs, statutes, and other resources related to manufactured home parks and manufactured housing;

Bill Van Vliet, Executive Director

9-15-14 Date

Bill Van Vliet Executive Director

## Neighborworks Umpqua

As an organization committed to helping people in Southern Oregon improve their communities, Neighborworks Umpqua has the ability to help provide funding, counseling and expertise to people displaced by park closure within our service area. Thus, Neighborworks Umpqua commits to:

- Coordinate with Lead Local Agency in attempts to survey and asses risk of park closure in communities that we serve
- Offer Relocation Counseling, Credit Counseling, and Housing Counseling—including physical assessment of units—to residents affected by park closure within our service area
- In the event of park closure, offer IDA matched savings accounts to residents who may be ready for homeownership
- Participate in Park Closure Resource Fairs, and attempt to help interested residents find rental housing, either in our units or units owned by other parties
- Continue the broader Springfield Collaborative discussion, and assist in future efforts (including training activities, fundraising, publicizing, and reconvening)

Signed: Kauan B. Cee C Karan Reed, Director of Housing

9/15/16 Date

Karan Reed Director of Housing

## St. Vincent de Paul Society of Lane County

For more than 60 years, St. Vincent de Paul has provided a broad range of social service programs that help low income people become self-sufficient. St. Vinnie's is the largest nonprofit humanitarian agency in Lane County with more than 550 employees, over 1,300 units of affordable housing, five emergency service programs, seven veterans programs, and a department wholly dedicated to self-sufficiency programs. Later this year, St. Vincent de Paul will dedicate Alona Place, a new 40-unit affordable housing complex in Junction City, and the agency continues to pursue the acquisition of mobile home parks with the aim of preserving a critically important and diminishing source of low-income housing. St. Vinnie's currently owns five such parks, and its most recent acquisition is the 43-unit Tivoli Mobile Home Park in Junction City.

### Thus, St. Vincent de Paul commits to:

- Continue to interact with the Springfield Coalition project partners to identify resources and services to assist park residents facing displacement.
- Assist homeowners (with existing trailers) in accessing services and resources.
- Continue to collaborate with partners, and share expertise, to seek ways to preserve existing affordable housing within parks, either through purchase by a non-profit (SVDP or other); or, through the purchase by the owners through a cooperative model.
- Support requests to foundations for funding to assist in relocation efforts
- Have representation on future committees or work groups as SVDP resources allow.

Date: 9/15/16

Terry McDonald Executive Director

# Catholic Community Services of Lane County

Catholic Community Services of Lane County (CCS) works to alleviate and reduce poverty in Lane County. CCS provides help for today through emergency assistance programs, creates hope for tomorrow through self-sufficiency programs, and fosters a more caring community through engagement with volunteers, donors, and partner organizations. The CCS Community Service Center in Springfield serves more than 12,000 low-income Springfield residents per year.

Catholic Community Services of Lane County will:

- Continue to participate with the City of Springfield and the Springfield Manufactured Home Park Solutions Collaborative partner organizations to identify resources and services to assist park residents facing displacement.
- Provide rental housing counseling services to displaced residents seeking rental housing.
- Help displaced residents gain access to the emergency assistance resources and self-sufficiency programs available at the CCS Springfield Community Service Center.

Signed: Tom Mulhern, Executive Director Date

Tom Mulhern Executive Director

# John VanLandingham, Lane County Law & Advocacy Center

I am a long-time advocate for residents of manufactured home parks, serving as the facilitator and primary tenant advocate and drafter of state legislation regarding manufactured home park tenancies in a coalition of MH park landlord and tenant advocates for more than 20 years. I support the Springfield Manufactured Home Park Solutions Collaborative and its goals.

#### I commit to:

- Sharing information between the Manufactured Housing Landlord/Tenant Coalition and the collaborative.
- Providing advice to other communities with park closure issues as my time and other commitments allow.

Signed: J2 H 9/15/70 16

John Van Landingham Date

John VanLandingham

# Housing and Community Services Agency of Lane County

Housing And Community Services Agency (HACSA) of Lane County is committed to providing safe, affordable, and energy-efficient housing for low income families, elderly citizens and persons with disabilities.

With these objectives in mind, HACSA commits to:

• Continue to support the Springfield Manufactured Home Park Solutions Collaborative and assist in future efforts (including participating in presentations and future meetings).

Signed:

Jacob Fox, Executive Director of HACSA

9, 8, 16
Date

Jacob Fox Executive Director

## Lane County Health and Human Services

Lane County, acting through its Health & Human Services Department, Human Services Division (HSD), is the Community Action Agency (CAA) for Lane County. The HSD administers anti-poverty funds throughout Lane County. Funded programs include nutrition, rental assistance, homelessness prevention programs, low-income energy assistance, weatherization, Community Services Block Grant, and other funding as it becomes available. A flow of Information and research related to manufactured housing, manufactured housing communities and

aging in place in manufactured housing can contribute to this work through ensuring that the partners stay abreast of emerging new practices and resources.

Therefore, Lane County Human Services Division commits to:
Use our structure and resources to assess and respond to the need when a manufactured home park closure is announced, including:

- Sharing information about re-housing research and innovations in the field
- Participating in periodic multi-agency planning meetings
- Acting as an informal liaison between the ongoing work group and other resources
- Providing expertise in identifying funding sources for replacement homes and renovation
- Share skills in evaluating investor owned and resident owned manufactured housing communities
- Assist in aligning with USDA's Rural Community
   Development Initiative Program (RCDI) to support funding opportunities

Signed: Decree Asserting Place

Alicia Hays, Director Date

Alicia Hays Director

# Neighborhood Economic Development Corporation

The Neighborhood Economic Development Corporation (NEDCO) is an organization committed to helping low and moderate income families and communities build assets, including accessing and preserving affordable housing and homeownership. NEDCO has been designated as the Regional Housing Center for Lane, Marion, and Clackamas Counties by Oregon Housing and Community Services. NEDCO has the ability and expertise to help families displaced by a mobile home park closure. Thus, NEDCO commits to:

- Be a member of the Springfield Rapid Response Team for mobile home park closures;
- Provide one-on-one financial and housing counseling to residents displaced by a park closure, within the limits of available resources;
- Assist the team to seek additional resources for large park closures;
- Be a liaison to counterpart Regional Housing Centers around the state as this model is replicated;
- Provide technical assistance and help facilitate supplemental training of housing counselors around the state in topics specific to mobile home park displacement (for example, at an Oregon ON conference).

Signed: 21 2 9/15/16
Emily Beiman, Executive Director Date

Emily Reiman Executive Director

## Regional Solutions Team

Governor Brown designated the Springfield Manufactured Home Park Solutions Collaborative an Oregon Solutions project recognizing that enabling a jurisdiction to provide comprehensive assistance to residents facing displacement addresses the triple bottom line of the Sustainable Community Objectives; and, addresses important Oregon Regional Solutions Committee priorities, specifically in the area of housing. On behalf of the state of Oregon, the Governor's Regional Solutions Centers will continue to track the work of the Springfield Collaborative and assist with leveraging state, federal and private resources to apply these tools to any other community in Oregon in need. Specifically, we will:

Continue to assist with state agency coordination and integration as needed for collaborative governance, technical assistance, information sharing and regulatory considerations in support of the Springfield Collaborative, advancing affordable housing opportunities, addressing local community needs and aiding those facing displacement from their homes as a result of circumstances beyond their control.

- Continue to convene agencies, municipalities, private business, philanthropy, and bring others to the table
- Provide opportunities to share the work of the collaborative with the appropriate Regional Advisory Committees and the Governor's Office.
- Foster partnerships between state, federal and local levels of government, civic leaders, non-profit organizations and businesses.
- Support the collaborative's efforts to secure needed support and funding, as appropriate.

9/15/2016 Date

Jackie Mikalohis Governor's Office Regional Solutions Coordinator

Jackie Mikalonis Governor's Office Regional Solutions Coordinator

## Oregon Department of Environmental Quality

DEQ's mission is to be a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water while working collaboratively with Oregonians for a healthy, sustainable environment.

Most manufactured home parks on the outskirts of communities or in rural areas use large onsite septic systems to treat and dispose of sewage because sanitary sewers are unavailable. DEQ regulates these septic systems and requires certain monitoring and maintenance by licensed professionals. However, many of these septic systems are decades old and overburdened making them more likely to fail. Park owners may be unable or unwilling to repair or replace systems increasing the odds of sewage backups, overflows and public health issues sometimes resulting in park closures.

With our mission in mind, DEQ commits to:

 Provide technical assistance to manufactured home park owners with onsite septic systems to identify cost-effective solutions to address issues discovered during inspections or complaint investigations

- Administer the Oregon Onsite Loan program to provide low-interest loans to residents and small businesses to repair or replace septic systems
- Work with manufactured home park owners with failing septic systems to address public health threats and exhaust all practical avenues of reaching compliance to avoid displacing residents
- · Notify Oregon Housing and Community Services when initiating enforcement with a manufactured home park owner because of failing septic
- Continue to support the Springfield Manufactured Home Park Solutions Collaborative and assist in future efforts (including participating in presentations and future meetings).

Signed: Leah K. Feldon 9/7/16

Date

Deputy Director,

Department of Environmental Quality

Leah K. Feldon **Deputy Director** 

# I. Glossary

**CAP Agency:** Community Action Program

**CDC:** Community Development Corporation

**CDFI:** Community Development Financial Institution

**DEQ:** Department of Environmental Quality

HACSA: Housing and Community Services Agency

**HUD:** Housing and Urban Development

**IDA:** Independent Development Account

LLA: Lead Local Agency

LOIS: Laboratory Online Information System

MCRC: Manufactured Community Resource Center

**NEDCO:** Neighborhood Economic Development Corporation

**OHCS:** Oregon Housing and Community Services

**SHOP:** Self-Help Opportunity Program

**RHC:** Regional Housing Centers

**RLID:** Regional Land Inventory Database

RMV: Real Market Value

SWVRS: Southern Willamette Valley Regional Solutions

**USDA:** United State Department of Agriculture

**SVDP:** St. Vincent De Paul

NOTES	