

Note: Anyone wishing to speak at any Planning Commission meeting is encouraged to do so. If you wish to speak, please rise and, after you have been recognized by the Chair, give your name and complete address for the record. You will then be allowed to speak. Please note that the public testimony may be limited by the Chair and normally is not allowed after the Public Hearing is closed.

**ASHLAND PLANNING COMMISSION
SPECIAL MEETING
JULY 24, 2012
AGENDA**

- I. **CALL TO ORDER**
- II. **ANNOUNCEMENTS**
- III. **PUBLIC FORUM**
- IV. **UNFINISHED BUSINESS**
 - A. Approval of Findings for PA-2012-00265, Drive-up Uses Amendment.
 - B. Approval of Findings for PA-2012-00575, 1155 East Main Street.
- V. **PRESENTATION**
 - A. Grey Water Presentation by Building Official Michael Grubbs & Plumbing Inspector Rick Hackstock
- VI. **DISCUSSION ITEM**
 - A. Manufactured Dwelling Standards/SOU Student Report
- VII. **ADJOURNMENT**



In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Community Development office at 541-488-5305 (TTY phone is 1-800-735-2900). Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to the meeting (28 CFR 35.102-35.104 ADA Title 1).

BEFORE THE PLANNING COMMISSION
City of Ashland, Jackson County, Oregon
July 24, 2012

IN THE MATTER OF PLANNING ACTION #2012-00265, A REQUEST FOR A)
LEGISLATIVE AMENDMENT TO AMEND THE ASHLAND MUNICIPAL)
CODE AS IT RELATES TO DRIVE-UP USES IN COMMERCIAL DISTRICTS.)
DRIVE-UP USES ARE CURRENTLY ALLOWED ONLY AS SPECIAL)
PERMITTED USES IN THE PORTIONS OF THE C-1 ZONING DISTRICT)
EAST OF A LINE DRAWN PERPENDICULAR TO ASHLAND STREET AT)
IT'S INTERSECTION WITH SISKIYOU BOULEVARD. DRIVE-UP USES ARE)
EXPLICITLY PROHIBITED IN THE HISTORIC INTEREST AREA AS DE-)
FINED IN THE COMPREHENSIVE PLAN. THE PROPOSAL WOULD PRO-)
VIDE EXCEPTION LANGUAGE ALLOWING EXISTING DRIVE-UP USES)
IN THE HISTORIC INTEREST AREA TO REDEVELOP ON-SITE OR RE-)
LOCATE TO NEW SITES ELSEWHERE IN THE HISTORIC INTEREST)
AREA PROVIDED THAT THE RELOCATED OR REDEVELOPED DRIVE-UP)
USE WOULD BE LOCATED PREDOMINANTLY UNDERGROUND OR)
OTHERWISE SCREENED FROM VIEW FROM THE RIGHT-OF-WAY.)

RECOMMENDATION

APPLICANT: Ashland Food Co-Op)

RECITALS:

- 1) The application is a request for a Legislative Amendment to amend the Ashland Municipal Code as it relates to drive-up uses in Commercial districts. Drive-up uses are currently allowed only as "special permitted uses" in C-1 zoning districts, but only in the area east of a line drawn perpendicular to Ashland Street at its intersection with Siskiyou Boulevard. Drive-up uses are explicitly prohibited in the Historic Interest Area defined in the Comprehensive Plan. The application proposes to provide for exception language allowing existing drive-up uses in the Historic Interest Area to redevelop on their existing sites or relocate to new sites elsewhere within the Historic Interest Area, provided that the relocated drive-up use would be located predominantly underground or otherwise screened from view from the public right-of-way.
- 2) A Legislative Amendment is defined in AMC 18.08.345 and is subject to the requirements for a Legislative Amendment described in AMC 18.108.170 as follows:

SECTION 18.08.345 Legislative amendment.

An amendment to the text of the land use ordinance or the comprehensive plan or an amendment of the zoning map, comprehensive plan maps or other official maps including the street dedication map described in section 18.82.050, for land involving numerous parcels under diverse ownerships.

SECTION 18.108.170 Legislative Amendments.

- A. *It may be necessary from time to time to amend the text of the Land Use Ordinance or make other legislative amendments in order to conform with the comprehensive plan or to meet other changes in circumstances and conditions. A legislative amendment is a legislative act solely within the authority of the Council.*
- B. *A legislative amendment may be initiated by the Council, by the Commission, or by application of a property owner or resident of the City. The Commission shall conduct a public hearing on the proposed amendment at its earliest practicable meeting after it is submitted, and within thirty days after the hearing, recommend to the Council, approval, disapproval, or modification of the proposed amendment.*
- C. *An application for amendment by a property owner or resident shall be filed with the Planning Department thirty days prior to the Commission meeting at which the proposal is to be first considered. The application shall be accompanied by the required fee.*
- D. *Before taking final action on a proposed amendment, the Commission shall hold a public hearing. After receipt of the report on the amendment from the Commission, the Council shall hold a public hearing on the amendment. Notice of time and place of the public hearings and a brief description of the proposed amendment shall be given notice in a newspaper of general circulation in the City not less than ten days prior to the date of hearing.*
- E. *No application of a property owner or resident for a legislative amendment shall be considered by the Commission within the twelve month period immediately following a previous denial of such request, except the Commission may permit a new application if, in the opinion of the Commission, new evidence or a change of circumstances warrant it.*

3) The Planning Commission, following proper public notice as required in AMC 18.108.170.D., scheduled a public hearing on May 8, 2012 at which time testimony was received and exhibits were presented. Following public testimony, the Commission continued the hearing to the regular meeting of June 12, 2012 in order to allow time for the Transportation Commission to review and comment on the proposal at its May 24, 2012 meeting. At the continued public hearing on June 12, 2012 testimony was received and exhibits were presented. Following the closing of the public hearing, the Planning Commission deliberated and recommended that the City Council approve the proposed Legislative Amendment subject to additional performance standards and design requirements to minimize potential impacts to the Historic Interest Area.

Now, therefore, the Planning Commission of the City of Ashland recommends as follows:

SECTION 1. EXHIBITS

For the purposes of reference to these Findings, the attached index of exhibits, data, and testimony will be used.

Staff Exhibits lettered with an "S"

Proponent's Exhibits, lettered with a "P"

Opponent's Exhibits, lettered with an "O"

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SECTION 2. CONCLUSORY FINDINGS

2.1 The Planning Commission finds that it has received all information necessary to make a recommendation based on the Staff Report, public hearing testimony and the exhibits received.

2.2 The Planning Commission finds that the proposal for a Legislative Amendment to amend the Ashland Municipal Code as it relates to drive-up uses in Commercial districts meets all applicable criteria for the approval of Legislative Amendment as described in Chapter 18.108.170. The Planning Commission accordingly recommends approval of the Legislative Amendment with the addition of specific performance standards and design requirements which are delineated in 2.6 below.

2.3 The Planning Commission finds that the original Transportation Element of Ashland's Comprehensive Plan, adopted in 1982, included a policy explicitly discouraging the use of drive-up windows with the stated intent of limiting both fuel consumption and air pollution associated with vehicle idling while waiting at drive-ups. In keeping with this policy, in 1984 the city adopted Ordinance #2313 which defined a drive-up use as "any establishment which by design, physical facilities, service or by packaging procedures encourages or permits customers to receive services, obtain goods, or be entertained while remaining in their motor vehicles," set standards for the development of drive-up uses, required Conditional Use Permits for the approval of drive-up uses, and limited the total number of drive-up uses in the city to the 12 in place on July 1, 1984 plus one additional drive-up use for each additional 1,250 persons added to the state-certified population census for the city. As part of that ordinance, drive-up uses were prohibited in Ashland's Historic Interest Area as defined in the Comprehensive Plan (see attached Staff Exhibit S-1), and existing drive-up uses within the Historic Interest Area were rendered non-conforming.

In 1992, the ordinance was amended to make drive-up's a Special Permitted Use rather than a Conditional Use, and to limit the number of drive-up uses allowed in the city to the 12 that were in place on July 1, 1984 with no allowance to increase this number with increased population. By ordinance, drive-up uses are allowed to be transferred between users and locations, subject to the requirements of the Ordinance, but the total number of approved drive-up uses allowed in the city remains at the 12 which were in place on July 1, 1984. These include:

1.	250-300 N. Pioneer St./Umpqua Bank	<i>(Historic Interest Area & Zoned E-1)</i>
2.	67 E. Main St./Wells Fargo Bank	<i>(Historic Interest Area)</i>
3.	30 N. Second St./U.S. Bank	<i>(Historic Interest Area)</i>
4.	243 E. Main St./Chase Bank	<i>(Historic Interest Area)</i>
5.	2290 Ashland St./Taco Bell	
6.	2235 Ashland St./Premier West Bank	
7.	2280 Ashland St./Bi-Mart Pharmacy	

8.	1652 Ashland St./Dutch Bros.
9.	1500 Siskiyou Blvd./People's Bank
10.	1624 Ashland St./Wendy's
11.	512 Walker Ave./Sterling Savings Bank
12.	Inactive (was previously McDonalds', now reportedly held – but not currently in use - by Rogue Federal Credit Union)

The Commission finds that of the 12 existing drive-up permits, all four of those currently established in the Historic Interest Area are financial institutions. The Commission further finds that in reviewing the historic district survey descriptions of these properties, none of these buildings is considered to be a contributing resource to the districts, and with the exception of US Bank, the narrative descriptions within the inventory cite the buildings' relationships to the sidewalk or streetscape, or site lay-out to accommodate drive-up uses, as key factors in their lack of compatibility with the historic character of the district.

The Planning Commission further finds that the Transportation Element of the Comprehensive Plan as revised in 1996 no longer contains an explicit policy discouraging drive-up uses, since it was unnecessary due to the ordinance already in place limiting these uses. However, the current Transportation Element retains policies which continue to support discouragement of drive-up uses, including:

X.II-1 *“Promote decreased auto use and increased walking and bicycling, public transportation, ride sharing and other transportation demand management techniques.”*

X.II-6 *“Encourage businesses to inform customers of available non-auto access to the business locations and to support customer use of non-auto access.”*

The Commission further finds that the Comprehensive Plan and its implementing ordinances encourage human scale development with a balanced approach to transportation rather than taking a primarily auto-centric approach to development. The city's design standards encourage designs which limit the adverse impacts of the automobile on the built environment in large part by minimizing, carefully placing and screening parking areas and driveways while emphasizing a high standard of urban design and a strong relationship between buildings and the pedestrian streetscape. City standards and requirements place special emphasis on the Historic Interest Areas, and particularly the downtown. Ashland's Downtown Design Standards explicitly discourage auto-centric uses in the downtown (VI.J-6), and the removal of off-street parking requirements in the downtown, downtown design standards, and prohibition on drive-up's in the Historic Interest Area all work to create a pedestrian friendly environment with a continuous storefront streetscape at the sidewalk.

The Planning Commission finds that the application proposes an amendment to the Land Use Ordinance which currently explicitly prohibits drive-up uses in the Historic Interest Area. Ashland's Historic Interest Area consists of the four National Register of Historic Places-listed

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historic districts. As initially proposed by the applicants, the amendment would add exception language to the ordinance to allow existing drive-up uses within the Historic Interest Area to relocate to a new site elsewhere within the C-1 or C-1-D zoned portions of the Historic Interest Area provided that they are located “*predominantly underground or otherwise screened from view from the public right-of-way.*”

The Commission further finds that the application explains that the amendment proposal is being made by Ashland Food Co-op as applicant, noting that both the Co-op and its neighbor Umpqua Bank are keenly aware of parking challenges at their sites. The Co-op would like to pursue the purchase of the adjacent bank property to expand their building and add parking, however the bank wishes to remain in the Historic Interest Area near the downtown and to keep a drive-up window for its customers. As currently regulated, the bank could not relocate elsewhere in the Historic Interest Area without a Variance, and any modification to the existing drive-up use on the current site would be subject to a Conditional Use Permit for modification of an the existing non-conforming use due both to its location within the Historic Interest Area and outside of the C-1 zoning district where drive-up uses are allowed. The applicants assert that the current prohibition on new drive-up uses in the Historic Interest Area combined with the non-conforming status of existing drive-up uses in that area, and the resultant requirement that these uses obtain discretionary approvals (i.e. Conditional Use Permits or Variances) for any modification of their non-conforming uses serve to prevent upgrades to or redevelopment of these sites, as the financial institutions holding the existing drive-up uses are inherently risk-averse and unwilling to move forward with costly projects when their outcomes are uncertain and subject to obtaining discretionary approvals. As such, the proposed amendment would provide for these relocations through the Site Review process as a “Special Permitted Use”, which has considerably less discretion.

The Planning Commission finds that the application suggests that the changes proposed would facilitate more serious discussions between the Ashland Food Co-op and Umpqua Bank by removing one of the perceived barriers to the Co-op acquiring the bank’s property to better address parking in their vicinity, and more broadly suggests that in removing the perceived barrier posed by discretionary approval requirements, the requested ordinance changes could facilitate the redevelopment of the sites of current drive-up uses in a manner more in keeping with city design standards while minimizing the impacts of the relocated drive-up uses to the Historic Interest Area.

2.4 The Planning Commission finds that while the original regulation of drive-up uses was tied to issues of fuel consumption and air quality, their prohibition in the Historic Interest Area goes beyond these concerns to the more general discouragement of auto-centric uses in order to maintain the downtown’s historic, pedestrian friendly character. Ashland’s various standards seek to limit the adverse impacts of auto-centric design on the built environment in large part by minimizing, carefully placing and screening parking and circulation areas while emphasizing a high standard of urban design and a strong relationship between buildings and the pedestrian streetscape. These standards go even further in the downtown: explicitly discouraging auto-

centric uses in the Downtown Design Standards (VI.J-6) and directing that the city shall use its discretionary authority to deny new auto-centric uses while still providing for the improvement of existing facilities; largely eliminating requirements to provide required parking on site; and prohibiting drive-up uses to provide for a continuous storefront presence at the sidewalk that engages pedestrians and remains compatible with historic development patterns.

The Commission finds that drive-up uses by their very nature are designed to accommodate automobiles, and the concern with their placement in the Historic Interest Area is that auto-centric design can often occur to the detriment of a human scale pedestrian environment. The Commission further finds that specific concerns center on impacts to the built environment in terms of altering building relationships to the street, scale, proportion, rhythm of openings and horizontal rhythms, breaking up the continuous storefront presence to accommodate drive-up windows and associated vehicular circulation. In addition, placement of driveways with cars crossing the sidewalk, or queuing into the sidewalk, from an underground drive-up could substantially alter the pedestrian streetscape and impact safety and visibility.

2.5 The Planning Commission finds that the issue of discretion is a key consideration of the request. The relocation of the four existing drive-up uses within the Historic Interest Area could be handled with discretionary review through the Conditional Use Permit process to assure all potential impacts, including architectural compatibility, of each use are considered in a manner appropriate to the individual circumstances of each site and proposal. However, the Commission recognizes the applicants' concerns with discretionary Conditional Use Permit approval standards as at least a perceived barrier to the redevelopment of the four existing drive-up sites in the Historic Interest Area (Umpqua Bank, Wells Fargo Bank, Chase Bank and US Bank) and further recognizes that with the removal of this perceived barrier most of these sites have the potential for substantial redevelopment that under current standards could benefit the character of the downtown streetscape.

The Commission finds that in order to protect the historic built environment and pedestrian friendly character of the Historic Interest Area, it is important that any modification of the ordinance ensure that with redevelopment or relocation of drive-up uses, they be limited to secondary building elevations; that queuing lanes not be placed between building and the right-of-way other than an alley; that no more than one window or queuing lanes be allowed regardless of the number currently in use; that if the subject property abuts an alley, access to and from the drive-up be from the alley; that there be no access from a higher order street or through a primary building elevation; and that no demolition of buildings considered to be historic resources be permitted to facilitate the relocation or redevelopment of drive-up uses. The Commission further finds that while placement of drive-up uses underground or in some other manner which screens them entirely from view from the right-of-way may be appropriate for some sites it could lead to greater impacts to the rhythm of openings, and the need to provide barriers when drive-up uses are close; the larger concern for the Commission is in minimizing the impacts of drive-up uses to the streetscape by carefully regulating their placement and access as detailed above.

The Commission finds that the proposed modification is being considered as a means to encourage redevelopment of the sites of the four existing drive-up use permit holders already operating within the Historic Interest Area, all of which are financial institutions, and that the proposed modifications should be similarly limited to apply only to financial institutions, rather than encouraging uses of a more auto-centric nature or of a drastically different character within the Historic Interest Area.

The Commission further finds that the transfer of any drive-up use between users or sites, when such transfer is not associated with a Site Review application, should be subject to a ministerial permit. AMC 18.32.025.E.3.h limits the number of drive-up uses to the 12 which were in place on July 1, 1984 and provides for their transfer provided they meet all applicable requirements. The Commission finds that for purposes of maintaining an accurate record of the approved uses and verifying their compliance with applicable requirements, that those transfers not requiring Site Review approval should be required to obtain a ministerial permit.

2.6 The Planning Commission recognizes the potential benefit that could arise from the proposal in allowing the four existing drive-up uses in the Historic Interest Area to relocate and thereby opening the possibility for redevelopment of their current sites according to current standards, however the Commission finds that any lessening of the current prohibition needs to be carefully considered for the potential adverse impacts to the built environment and pedestrian-friendly, human-scale character of the National Register-listed Historic Interest Area. If the four drive-up uses are to be allowed to relocate without the discretionary consideration of a Conditional Use Permit as proposed, the Commission finds that the proposed ordinance amendment should be modified in order to minimize the adverse impacts that the current prohibition on drive-up uses in the Historic Interest Area was enacted to avoid with the addition of the following performance standards and design requirements:

- That relocation of the four existing drive-up uses or redevelopment of their existing sites in the Historic Interest Area (HIA) be allowed as a “Special Permitted Use” within the C-1 and C-1-D zoned portions of the HIA subject to “Type II” Site Review approval.
- That regardless of the number of drive-up windows/lanes in use in the current drive-up location, with relocation or redevelopment under this amendment the number of windows/lanes be reduced to one.
- That existing approved drive-up uses not currently in use in the HIA would continue to be unable to be transferred into the HIA. Relocation of the existing uses or redevelopment of existing sites in the HIA would be limited to the four existing financial institutions; all other uses would remain subject to existing regulations within the HIA.
- That with relocation or redevelopment, drive-up uses may only be placed on a non-street (other than an alley) facing secondary building elevation, and only accessed from an alley or driveway.

- That drive-up uses be clearly defined, and that this definition include all drive-up components (i.e. the kiosk, canopy or other structures, window, driveway and queuing lane). All components of a drive-up use shall be removed from the building/site within 60 days of discontinuation of the use through transfer, relocation or redevelopment.
- That driveways serving relocated drive-up uses may not enter from or exit to a higher order street frontage or through a primary elevation of the building, and that there is to be no placement of driveways or queuing lanes between a building and the right-of-way other than an alley.
- That no demolition of or exterior change to buildings considered to be historic resources be allowed to in order to accommodate the relocation of a drive-up use or redevelopment of its site through this amendment.
- That a ministerial permit be required for the transfer of any drive-up use when such transfer is not associated with a Site Review application. Uses which are discontinued without a properly permitted transfer shall be deemed to have expired after being unused for six (6) months.

2.7 The Planning Commission finds that with the standards and requirements recommended in 2.6 above, the proposed amendment may serve to encourage redevelopment of one or more of these bank sites to bring them more into compliance with current standards, thereby working to improve the streetscape character within the Historic Interest Area while minimizing adverse impacts posed by the existing drive-up uses by more carefully regulating their placement and access.

SECTION 3. DECISION

3.1 Based on the record of the Public Hearing on this matter, the Planning Commission recommends that the Council approve Planning Action #2012-00265 and adopt the associated ordinance amendments.

Planning Commission Approval

July 24, 2012

Date

BEFORE THE PLANNING COMMISSION
July 24, 2012

IN THE MATTER OF PLANNING ACTION #2012-00575, A REQUEST FOR)
SITE REVIEW APPROVAL TO CONSTRUCT A 3,016 SQUARE FOOT)
ADDITION AND ASSOCIATED SITE IMPROVEMENTS TO BRING THE)
SITE MORE INTO COMPLIANCE WITH CURRENT STANDARDS)
INCLUDING ADDITIONAL PARKING, LANDSCAPE AND HARDSCAPE)
IMPROVEMENTS FOR THE ASHLAND POLICE DEPARTMENT LOCATED) **FINDINGS,**
AT 1155 EAST MAIN STREET. THE ADDITION IS THE FIRST PHASE OF A) **CONCLUSIONS**
MULTI-PHASE PROJECT, WITH A SUBSEQUENT PHASE TO INCLUDE) **AND ORDERS**
ANOTHER 1,975 SQUARE FOOT ADDITION AND ASSOCIATED SITE)
IMPROVEMENTS WITHIN TWO TO FIVE YEARS.)
)
)
)
)
)

APPLICANT: City of Ashland)

RECITALS:

- 1) Tax lot #900 of Map 39 1E 10 is located at 1155 East Main Street and is zoned E-1, Employment.
- 2) The applicants are requesting Site Review approval to construct a 3,016 square foot addition and associated site improvements to bring the site more into compliance with current standards including additional parking, landscape and hardscape improvements for the Ashland Police Department located at 1155 East Main Street. This addition is the first phase of a multi-phase project, with a subsequent phase to include another 1,975 square foot addition and associated site improvements within two to five years. Site improvements are outlined on the plans on file at the Department of Community Development.
- 3) The criteria for Site Review approval are described in AMC 18.72.070 as follows:
 - A. *All applicable City ordinances have been met or will be met by the proposed development.*
 - B. *All requirements of the Site Review Chapter have been met or will be met.*
 - C. *The development complies with the Site Design Standards adopted by the City Council for implementation of this Chapter.*
 - D. *That adequate capacity of City facilities for water, sewer, paved access to and through the development, electricity, urban storm drainage, and adequate transportation can and will be provided to and through the subject property. All improvements in the street right-of-way shall comply with the Street Standards in Chapter 18.88, Performance Standards Options.*
- 4) The Planning Commission, following proper public notice, held a public hearing on June 12, 2012 at which time testimony was received and exhibits were presented. Subsequent to the closing of the hearing and the record, the Planning Commission approved the application subject to a number of conditions pertaining to the appropriate development of the site.

5) Subsequent to the Commission's approval of the application, but prior to the adoption of findings, the applicants approached the Staff Advisor with some concern that strict adherence to the letter and intent of the conditions imposed by the Planning Commission with regard to the removal of steps from the design to allow wheelchair accessibility of the front walkway could substantially alter the character of the improvements between the building and the street, as a series of switchbacks would be required to provide an accessible grade for the walkway. Because findings had not yet been adopted, the Staff Advisor provided proper public notice for a limited re-opening of the hearing to consider the treatment of the front walkway in light of the concerns expressed.

6) The Planning Commission, following proper public notice, re-opened the public hearing on July 10, 2012 at which time testimony was received and exhibits were presented. Following testimony, the hearing and the record were again closed, and the Planning Commission amended their prior approval of the project to allow the walkway design with steps as originally proposed by the applicants, rather than consuming a substantial additional area at the front of the site with ramp switchbacks to achieve an accessible grade. The Commission noted that an existing accessible route was already in place under the covered breezeway from the entrance to the nearest accessible parking space and would continue to serve in providing required accessibility.

Now, therefore, the Planning Commission of the City of Ashland finds, concludes and recommends as follows:

SECTION 1. EXHIBITS

For the purposes of reference to these Findings, the attached index of exhibits, data, and testimony will be used.

Staff Exhibits lettered with an "S"

Proponent's Exhibits, lettered with a "P"

Opponent's Exhibits, lettered with an "O"

Hearing Minutes, Notices, Miscellaneous Exhibits lettered with an "M"

SECTION 2. CONCLUSORY FINDINGS

2.1 The Planning Commission finds that it has received all information necessary to make a decision based on the Staff Report, public hearing testimony and the exhibits received.

2.2 The Planning Commission finds that the project complies with the standards for Basic Site Review Standards for Commercial, Employment and Industrial Developments in the Employment (E-1) zoning district. The application proposes to construct a 3,016 square foot addition at the rear of the existing Ashland Police Department building at 1155 East Main Street as the first phase of a multi-phase project. Off-street parking is located to the rear and side of the existing buildings with automobile access provided from East Main Street via existing driveways which serve the Police Department, Municipal Court, Council Chambers, Public Works facilities and the Grove community center. The site plan incorporate direct pedestrian access from East Main Street to the main building entrance, and includes improvements to the existing pedestrian access and the creation of an entry plaza to strengthen the existing building's sense of entry as it relates to the East Main Street pedestrian corridor.

2.3 The Planning Commission finds that the proposal complies with the first criterion to be considered for Site Review approval, that “*all applicable City ordinances have been met or will be met by the proposed development.*” The Commission finds that the Employment (E-1) zoning district is intended “to provide for a variety of uses such as office, retail, or manufacturing in an aesthetic environment and having a minimal impact on surrounding uses.” Outright permitted uses include “public and quasi-public utility and service buildings and yards, structures, and public parking lots...” The existing and proposed uses are consistent with these allowances, and the site is specifically identified in the Comprehensive Plan as accommodating public facilities. There is no minimum lot size or width requirement within the E-1 district, and the only yard requirements are that when abutting a residential district a side or rear yard of ten feet per story must be provided. As proposed, the property abuts residentially zoned property to the west and with a setback of 48 feet, substantially more than the required ten-foot per story side setback is provided for both the existing building and proposed addition.

The Commission further finds that the height limitation in the E-1 district is 40 feet, and the proposed building addition is only approximately 25 feet in height at the ridge’s peak. Solar Access requirements apply within the E-1 under Standard B which limits any shadow cast by a building on the property to no more than would be cast by a 16-foot fence on the subject property’s north property line. As defined in the Solar Ordinance the north property line would be on the opposite side of the railroad right-of-way to the north of the parent parcel, approximately 600 feet north of the proposed addition and providing ample separation to allow compliance with this standard.

The Commission finds that neither the Ashland Municipal Code’s Off-Street Parking Chapter (18.92) or the Institute of Transportation Engineer’s Parking Generation manual identify a specific parking requirement associated with police facilities. With regard to “unspecified uses”, AMC 18.92 provides that where automobile parking requirements for any use are not specifically defined, such requirements are to be determined based upon the most comparable use specified in this section and other available data. In considering the parking required for the proposal, the applicants have noted that the parking requirement is somewhat unique in that staff, officer and police vehicle parking must all be maintained separately from public parking, and in addition there is often the need to accommodate both impounded vehicles and vehicles which may be being held as evidence in active cases. The applicants have accordingly provided the following breakdown of their identified parking demand based on these operational requirements.

Specified Police Use	Spaces Required (with addition)
Staff Parking (<i>1/employee on largest shift</i>)	18
Parking for Marked Police Vehicles	8
Detective Vehicles	4
Deputy Chief Vehicle	1
Traffic Patrol Vehicle	1
Volunteer Vehicles	2
Community Service Officer Vehicle	1
Impounded Vehicles	5
TOTAL SPACES REQUIRED	40

Public parking for the Police Department, Municipal Court and the Grove Community Center is already in place on the subject property, and no increase in demand for parking for the general public is

anticipated in conjunction with the current request. Based on the operational requirements of the department, the Commission finds that the parking proposed is sufficient to address the identified operational requirements for Police Department use.

The Commission further finds that with 40 parking spaces to be provided, a minimum of eight bicycle parking spaces must also be made available and one-half of these spaces must be covered, with all bicycle parking designed according to the rack, dimension, and coverage standards of AMC 18.92.040. These bicycle parking spaces must also be located as close to the primary public entrance as the nearest automobile parking spaces. The Commission finds that the applicants have identified six new bicycle parking spaces to be installed, in addition to the four spaces now on site which more than complies with the requirement for bicycle parking. A condition has been included to require that the final building permit submittals demonstrate compliance with the requirements of AMC 18.92.040 in terms of the number of bicycle parking spaces, their placement, and coverage. The Commission finds that the proposal meets all applicable ordinance requirements of the City of Ashland.

2.4 The Planning Commission finds that the proposal complies with the second criterion for the approval of a Site Review permit that, *"All requirements of the Site Review Chapter have been met or will be met."* The Commission finds that developments within the E-1 zoning district must provide at least 15 percent of the subject property in landscaped area, and at least seven percent of parking areas must be provided in landscaping. As proposed, the application retains approximately 31.4 percent of the Phase One site area in landscaping, and the calculations provided note that approximately 18 percent of the proposed parking area will be provided in landscaping where only seven percent is required. Trash and recycling facilities are already in place elsewhere on site to serve the various city functions already established, and are not to be altered with the current request. A condition of approval has been included to require that all new lighting fixtures be identified in the building permit submittals, and that details of any necessary shrouding and screening be provided as well, to insure that the Site Review chapter's prohibitions on direct illumination of adjacent properties will be satisfied.

2.5 The Planning Commission finds that the proposal complies with the third criterion for Site Review approval criterion that, *"The development complies with the Site Design Standards adopted by the City Council for implementation of this Chapter."* The Commission further finds that the Site Design and Use Standards do not have separate requirements for public buildings, and as such the proposed addition is subject to Basic Site Review Standards for Commercial Development. The Basic Site Review Standards place a strong focus on addressing a building's sense of entry and relationship to the adjacent pedestrian streetscape, and with few exceptions call for the placement of buildings no more than 20 feet from the street. In this case, the existing building is at approximately 50 feet from the street, and the placement of the proposed addition at the rear of the building, which in itself does little to improve compliance with the standards. The application materials suggest that the site's topography necessitated the building's original placement, and that placement of the proposed addition at the street now would prove difficult due not only to the topographic constraints, but to the need to relate to the existing building's interior spaces and to the project's limited, forfeiture-dependent budget. In lieu of placing the addition to bring the existing building and site more into compliance with these standards, the applicants have proposed to modify the hardscape and landscape treatments in the entry area between the two buildings and East Main Street in order to enhance the two buildings' sense of entry by creating a more inviting, people-friendly space near the two entrances that better relates to East Main's pedestrian streetscape.

The Commission finds that the enhancement of this space would be a substantial benefit and greatly improve the sense of entry and functionality of both buildings. However, where the application materials suggest that replacing the existing turf areas at the front of the site - which are generally discouraged in the Site Design and Use Standards "Water Conserving Landscaping Guidelines and Policies" - with lower water use plantings, the Commission finds that the existing greenspace provided by the lawn area provides an important public function in providing an area for citizens to comfortably assemble in conjunction with public meetings held in the Council Chambers. The Commission accordingly finds that the existing lawn area between the Council Chambers and East Main Street should be maintained in a people-friendly greenspace (either as lawn or as a similar, but lower-water usage vegetative treatment) to provide an area which can comfortably accommodate public assembly while at the same time softening the building's appearance from the street and relating to the nearby greenspace at Garfield Park. A condition to this effect has accordingly been attached.

The Commission finds that the parking lot landscaping and screening standards require that seven percent of the parking lot area be provided in landscaping, that one parking lot tree be provided per each seven parking spaces, that the landscaping be distributed throughout the parking area, and that a minimum five-foot width landscape buffer is provided at property lines/boundaries to buffer adjacent properties or uses. Subsequent to the initial public notice for the hearing, a neighbor residing in residentially zoned property to the west of the addition raised concern that the existing landscape buffer on the west side of the drive be maintained. The application notes that this buffer, which is approximately 12 feet in width where only five feet is required, is to be maintained and enhanced with new landscaping to ensure adequate screening of the addition from the adjacent residences.

The Commission further finds that while the application materials provided include a request for Exceptions to the Site Design and Use Standards to address existing non-conformities with the current site's development, including: 1) the existing building's sense of entry and relationship to the Main Street streetscape is not consistent with basic site review standards; 2) that the existing site landscaping is not consistent with the landscaping standards; and 3) that the existing parking lot is not consistent with the parking lot design, landscaping and screening requirements, site improvements to address each of the non-conformities are proposed as part of the overall phasing timeline. The Commission finds that the Site Design and Use Standards in Section II-C-1g actually allow for existing non-conformities to be addressed incrementally to a degree proportional to the percentage of the addition proposed, and because the application is identifying the existing non-conformities and seeking to address them consistently with II-C-1g, no Exceptions are necessary. The Commission recognizes the value of the proposed addition in improving the functionality of the existing public facility and the vagary posed by the funding source, and has accordingly included conditions to ensure that these non-conformities are proportionally addressed through the project's phasing.

2.6 The Planning Commission finds that the final criterion to be considered for the approval of a Site Review permit is, *"That adequate capacity of City facilities for water, sewer, paved access to and through the development, electricity, urban storm drainage, and adequate transportation can and will be provided to and through the subject property. All improvements in the street right-of-way shall comply with the Street Standards in Chapter 18.88, Performance Standards Options."* The Planning Commission finds that the application materials provided indicate that city facilities for water, sewer, paved access to and through the development, electricity and urban storm drainage are already in place to serve the existing building and are adequately sized to continue to service the proposed expansion.

However, the Commission further finds that during the course of the public hearing, staff noted that there are potentially significant issues with the existing electrical services to the Ashland Police and Municipal Court buildings. According to the Building Official and the applicant's engineers, both buildings are currently served by a common transformer and a propane-fueled back-up generator, and as such, changes to the Police Department will impact both buildings. The existing generator is rated to carry 347 Amps, but the Electric Department recently recorded maximum currents of 269 Amps and 210 Amps for the Police and Courts buildings respectively. Therefore the existing generator is not rated to carry the combined loads of both existing buildings in their present configuration, even before the proposed addition. In addition, the existing 400 Amp transfer switch serving as the service entrance to both buildings is not listed or proper for this function, and a main service disconnect is not installed. As with the generator, the switch is undersized for the electrical loads of the existing buildings, without taking the added load of an addition into consideration. Finally, the feeder from the generator in the Police building is not rated to carry the anticipated load of the new addition. The anticipated total load is 475 Amps for the existing buildings and two additions proposed. The feeder has been verified by the Electric Department as consisting of two parallel feeds of #300 aluminum which is rated for only 460 Amps. The feeder from the generator to the Courts building is similarly at its maximum capacity, with a measured load of 210 Amps being carried on a single set of #300 aluminum rated for 230 Amps. The Building Official has met on site with the applicant's project team including engineers from local firm Marquess & Associates, Inc. and the following approach to resolving these issues has been identified: the existing transformer will need to be replaced; a new electrical service will need to be provided for the Police Department building; the old Police Department main panel will serve as a distribution panel, and a 100-Amp panel will need to be connected to this distribution panel to serve select loads; the existing generator will continue in service, but will need to be modified to provide service disconnect and overcurrent protection; and emergency power will be provided to designated emergency egress lighting by retrofitting battery back-up ballasts which will enable the transfer of power from the normal source to the battery back-up at the fixtures in both buildings. The Building Official has indicated that this proposal could provide an acceptable means to resolve the identified issues subject to approval of a final engineered design as part of a final electrical service plan, and the Planning Commission has accordingly attached a condition to require that a final electrical service plan addressing these issues be provided with the building permit submittal for the review of the Building, Planning, Public Works and Electrical Departments.

The Planning Commission finds that Engineering staff has also indicated that while the proposed first phase does not involve an increase in impervious surfaces because the proposed addition is to be constructed over already-paved areas, with the second phase more than 5,000 square feet of new impervious surface could be created with the removal of a lawn area and construction of additional parking areas. The City's Engineering Department will ultimately need to review and approve a final, engineered storm drainage plan and determine that the post-development peak flows are less than or equal to the pre-development peak flow for the site as a whole, and that storm water quality mitigation is addressed through the final design. This new parking area is also subject to current design standards found in AMC 18.92.080.B which include specific requirements to address parking lot drainage while minimizing environmental and microclimatic impacts through site design and material selections by using light colored paving materials, porous solid surfacing or open grid paving, or providing shade via tree canopy coverage, solar generating carports, canopies, or trellises for at least 50 percent of the parking area, and capturing and treating run-off on site in landscaped medians or swales. The application materials provided indicate that the new parking area is to be installed entirely in permeable

material, and with this type of installation the Engineering Division will not likely require on-site detention. A condition has been included to require that the site plans be modified to include required swales in the new parking area to comply with current standards prior to the submittal of a building permit.

The Planning Commission finds that East Main Street is a city street classified as a Boulevard or Arterial within the current Transportation System Plan, and is currently fully improved, with two paved travel lanes, bike lanes, curbs, gutters, storm drains, curbside sidewalks and street trees in place, and that no further street improvements are required.

2.7 The Planning Commission finds that tree inventory and tree preservation plan have been provided identifying 51 trees on the area of the subject property proposed to be disturbed. Of these 51 trees, eight trees greater than six-inches in diameter at breast height (d.b.h.) are proposed to be removed over the course of the two phases of the project. As a city-owned property, only the removal of trees defined as "significant" by having a diameter greater than 18-inches d.b.h. triggers Tree Removal Permit requirements, and in this instance none of the trees to be removed are large enough to be considered significant or require permit review.

The Planning Commission further finds that in reviewing the proposal, the Tree Commission had recommended that Tree #50, a ten-inch d.b.h. Maple in poor-to-fair condition which is proposed to be removed to accommodate parking lot improvements be preserved and protected, and that two additional trees be provided within the landscape buffer strip on the western boundary of the property between the existing driveway and adjacent residential uses. In considering the retention of Tree #50, the Commission noted that during the hearing the applicants explained that the tree was incorrectly located on the original drawings and that it was in a location where it could not be retained while providing required parking and circulation areas according to the applicable standards. The Commission considered requiring the planting of additional trees within the required landscape buffer, however in visiting the site with the applicants and a number of neighboring residents it was noted that the existing hedge within the already-substantially-larger-than-required landscape buffer was well established and provided a very effective screen to buffer the uses. The concern was expressed that the sight-obscuring nature of the hedge would need to be altered, lessening its effectiveness, in order to accommodate the planting and maintenance of additional trees. As such, the Commission felt that the plantings already in place and established served to provide an effective buffer between the uses and adequately already more than adequately addresses the parking lot landscaping and screening requirements in this location.

2.8 In considering concerns raised by neighbors during the hearing as to the placement of mechanical equipment on the west side of the addition, near the neighboring residences, and the potential creation of a "noise corridor" with the placement of a long, uninterrupted wall adjacent to the driveway which could reflect sound from the driveway to the neighbors, the Planning Commission finds that the mechanical equipment needs to be relocated interior to the site to avoid the potential acoustic impact to neighbors. It was noted during the meeting that the equipment could be accommodated on the east side of the proposed Phase II addition and could be appropriately screened to minimize any adverse impacts to users of the Police Department or Council Chambers. A condition to this effect has been attached.

The Commission also finds that to avoid the creation of a “noise corridor” and avoid adverse impacts from driveway noise being reflected toward the neighboring residences, that the material treatment of the west wall of the addition be modified to use different materials or articulation to break-up the long, uninterrupted wall and minimize the reflection of sound to the neighbors.

SECTION 3. DECISION

3.1 Based on the record of the Public Hearing on this matter, the Planning Commission concludes that the proposal for Site Review approval to construct a 3,016 square foot addition and associated site improvements for the Ashland Police Department at 1155 East Main Street as the first phase of a multi-phase project is supported by evidence contained within the whole record.

Therefore, based on our overall conclusions, and upon the proposal being subject to each of the following conditions, we approve Planning Action #2012-00575. Further, if any one or more of the conditions below are found to be invalid, for any reason whatsoever, then Planning Action #2012-00575 is denied. The following are the conditions and they are attached to the approval:

- 1) That all proposals of the applicant be conditions of approval unless otherwise modified herein, including that new parking areas shall be installed and maintained in permeable materials.
- 2) That a sign permit shall be obtained prior to the installation of any new signage, and all signage shall meet the requirements of Chapter 18.96, including any applicable requirements to provide adequate vision clearance areas.
- 3) That the plans submitted for the building permit shall be in substantial conformance with those approved as part of this application. If the plans submitted for the building permit are not in substantial conformance with those approved as part of this application, an application to modify the Site Design Review approval shall be submitted and approved prior to issuance of a building permit.
- 4) That, if deemed necessary by the Building Official, a Demolition/Relocation Permit approval shall be obtained from the Building Division prior to issuance of a demolition permit or commencement of demolition work for the existing carport on site.
- 5) That construction hours for the project shall be limited to between 8:00 a.m. and 4:30 p.m. to minimize disturbance to neighboring residents, as proposed by the applicants.
- 6) That construction be staged from the east side of the proposed Phase I addition, and that all construction traffic use a temporary construction access out to the existing public parking lot rather than using the existing gated driveway on the west side of the Police Department building.
- 7) That the building permit submittal materials shall include:
 - a) Identification of all easements, including but not limited to public and private utility easements.
 - b) Phase One building permit submittals shall include revised landscape and irrigation plans which address the landscape and hardscape treatments proposed along the frontage of the Police Station and Municipal Court buildings to create an enhanced entry plaza and public assembly space for the review and approval of the Staff Advisor. The treatment of this area shall maintain a people-friendly greenspace in lawn or a similar (but lower-water use) vegetative treatment to soften the building’s appearance, relate to the nearby greenspace at Garfield Park, and provide an area adjacent to the Council Chambers which

can comfortably accommodate public assembly. These improvements shall be completed according to approved plan within two years of completion of the first phase building addition, inspected and approved by the Staff Advisor.

- c) Phase One building permit submittals shall include revised parking lot design drawings reflecting the requirements to include drainage swales within the landscape medians as required in the parking design standards. The improvements associated with the parking lot expansion shall be completed according to approved plan prior to submittal of a land use application for Phase Two, inspected and approved by the Staff Advisor.
- d) A final electric design and distribution plan including load calculations and locations of all primary and secondary services including transformers, cabinets and all other necessary equipment. This plan must be reviewed and approved by the Planning, Building, Engineering and Electric Departments prior to the issuance of a building permit. Electrical services shall be installed underground, and any transformers or cabinets shall be located in areas least visible from streets, while considering the access needs of the Electric Department.
- e) That exterior building materials and paint colors shall be compatible with the existing structure and surrounding area, and sample exterior building colors shall be provided with the building permit submittals for review and approval of the Staff Advisor.
- f) That the location and final engineering for required storm drainage improvements associated with the project, shall be submitted for review and approval by the Departments of Public Works, Planning and Building Divisions. The storm drainage plan shall demonstrate that post-development peak flows are less than or equal to the pre-development peak flow for the site, and that storm water quality mitigation, if deemed necessary by the Engineering Division, has been addressed through the final design.
- g) That a final utility plan shall be submitted for review and approval by the Engineering, Building and Planning Divisions. The utility plan shall include the location of connections to all public facilities in and adjacent to the development, including the locations of water lines and meter sizes, fire hydrants, sewer mains and services, manholes and clean-outs, storm drainage pipes and catch basins, and locations of all primary and secondary electric services including line locations, transformers (to scale), cabinets, meters and all other necessary equipment. Transformers and cabinets shall be located in areas least visible from streets, while considering the access needs of the Electric Department.
- h) That Phase I building permit submittals shall be revised to include the following modifications for final review and approval by the Staff Advisor:
 - i) Modified material treatment on the west wall of the Phase I addition. Modifications shall include a different material treatment and articulation to break-up the wall and thereby minimize the creation of a “noise corridor” which would otherwise reflect sound toward the adjacent residential neighbors.
 - ii) Modified placement of mechanical equipment. The mechanical equipment shown for placement near the driveway adjacent to nearby residences be relocated interior to the site, on the east side of the proposed Phase II addition, and appropriately screened to minimize visual and acoustic impacts to users of the Ashland Police Department and Council Chambers buildings

- 8) That a Tree Verification Permit shall be applied for and approved by the Staff Advisor prior to site work including building demolition, storage of materials, or permit issuance. The Verification Permit is to inspect the identification of the trees to be removed and the installation of tree protection fencing for the other trees that are to be retained on the subject property. The tree protection shall consist of chain link fencing six feet tall and installed in accordance with AMC 18.61.200.B and the approved Tree Protection Plan, and shall be inspected and approved by the Staff Advisor prior to site work including demolition, storage of materials or permit issuance.
- 9) That prior to the issuance of a certificate of occupancy:
- a) In addition to the two existing “inverted U” racks already in place, six bicycle parking spaces shall be installed in accordance with the approved plan and the design and rack standards in 18.92.040.I and J prior to the issuance of the certificate of occupancy. Inverted u-racks shall be used for the bicycle parking, and the building permit submittals shall verify that the bicycle parking spacing and coverage requirements are met in accordance with 18.92.040.I.
 - b) That any improvements to the sidewalk or adjacent public right-of-way, including but not limited to the new walkway from the sidewalk providing connection the enhanced plaza space, shall be installed to City of Ashland standards under permit from the Public Works Department and in accordance with the approved plan prior to the issuance of a certificate of occupancy.
 - c) That all exterior lighting shall be directed on the property and shall not directly illuminate adjacent properties.
 - d) That all hardscape improvements, landscaping, and irrigation shall be installed according to the approved plan, inspected, and approved by the Staff Advisor prior to the issuance of a certificate of occupancy.
- 10) That prior to the commencement of Phase Two:
- a) That the proposed Phase One parking expansion shall be completed according to the approval plans, inspected and approved by the Staff Advisor.
 - b) That the applicants shall obtain Site Review and building permit approvals for Phase Two.

Planning Commission Approval

Date

Memo

DATE: July 24, 2012

TO: Ashland Planning Commission

FROM: Maria Harris, Planning Manager

RE: Manufactured Dwelling Standards - Unified Land Use Code Project Update

SUMMARY

Staff requests feedback from the Planning Commission on incorporating the update of the manufactured home standards into the Unified Land Use Code Project. The ordinance includes standards addressing manufactured homes on individual lots as well as a chapter on manufactured housing developments. The Housing Commission has expressed interest in the standards, especially those related to locating manufactured homes on individual lots. Staff believes some relatively minor adjustments could be made to improve the standards to allow the same flexibility given to the development of single-family residences. Pat Acklin's "Planning Issues Class" at Southern Oregon University (SOU) studied the manufactured housing requirements, and reported their research to the Housing Commission. The comments from the SOU students' research are attached, as well as an article on manufactured housing from the Housing Commission discussion material.

STAFF RECOMMENDATION AND REQUESTED ACTION

1. Background

The standards for manufactured homes on individual lots were updated in 1991 and the chapter on manufactured housing developments was updated in 1992 to implement newly adopted state land use requirements at that time.

Oregon Revised Statutes require that local land use regulations permit manufactured dwellings on individual lots in zones where single-family dwellings are permitted, and that the local regulations applied to manufactured homes on individual lots not exceed those applied to single-family dwellings. In terms of manufactured housing developments, state law requires local governments to project needs for manufactured home parks, to include manufactured home parks in the land use plans as an allowed use, and to use clear and objective criteria and standards in reviewing manufactured home park proposals. Additionally, state law restricts local government from allowing new manufactured home parks to be established on land or zoned for commercial or industrial use. State law exempts designated historic districts from the manufactured home requirements.

2. Recommendation

Staff believes the SOU student research raises issues which should be considered further such as the required size and dimensions of manufactured homes, the requirement to install a 14 foot x 20 foot



accessory building or garage, and the required setbacks inside manufactured housing developments. As stated earlier, staff believes some relatively minor adjustments could be made to improve the standards to allow the same flexibility given to the development of single-family residences to manufactured homes, and recommends incorporating the update of the manufactured home standards into the Unified Land Use Code Project

SUGGESTED MOTION

N/A

ATTACHMENTS

1. Ashland Land Use Ordinance citations relating to Manufactured Housing: Comments Provided by Prof. Acklin's Planning Issues Class: SOU – ES/GEOG 404 Spring 2012
2. "Some Assembly Required: Using Manufactured Housing in Affordable Housing Development." Naomi Cytron. Community Investments. September 2005.



Ashland Land Use Ordinance citations relating to Manufactured Housing

Comments provided by Prof. Acklin's Planning Issues Class:

SOU – ES/GEOG 404 Spring 2012.

Student contributors included: Kayla Carroll, Brian Cole, Andrew Hill, Kevin Moore, Shadassa Ourshalimian, Helim Picado, Vincent Shelton, Jolene Walker

(The student comments are italicized and red)

Permitted outright in the following districts:

R-1 (Single Family Residential District) 18.20.020

R-2 (Low Density Multi-Family Residential District) 18.28.020

R-3 (High Density Multi-Family Residential District) 18.28.020

I. Manufactured homes on individual lots, subject to the following criteria:

1. The portion of the lot on which the manufactured home is to be located shall not exceed a slope of 10% prior to excavation or fill on the parcel.

Should follow HUD regulations (if any) and/or city environmental constraints ordinance.

2. The manufactured home shall be multi-sectional, no less than 28 feet in width, and have a minimum enclosed floor area of 1,000 sq. ft.

Options:

▪ *Match minimum requirements for HUD regulated homes defined under CFR 4150.2 Section 8-0: "...eight feet or more in width and forty feet or more in length... [and] at least 400 sq. ft."**

▪ *Use smaller values from other city codes, e.g. Salem (865 sq. ft.) or Eugene, same standards for all homes.*

▪ *No minimum size as for standard homes in Ashland; consider this for manufactured homes.*

3. The manufactured home shall have a roof pitch of a minimum of 14 degrees (3 feet in height for each 12 feet in width).

This is a pretty standard requirement and applicable to all homes in Corvallis and elsewhere.

4. The manufactured home shall have no metal siding or roofing, and shall have wood or wood-product siding and composition roofing, or approved equivalent.

There are better ways to deal with this. See language from Corvallis and Salem requiring siding/roofing to be non-reflective or blend in with materials used elsewhere in neighborhood.

5. The manufactured home shall have an auxiliary storage building or garage at least 14 x 20 feet in area, constructed of similar materials as that used on the exterior of the manufactured home.

If the owner constructs these, they should be of the same materials as the home but should not be required as they are not required for other single family dwellings.

6. The manufactured home shall be certified by the manufacturer to meet the thermal envelope requirements equivalent to those for a single-family dwelling constructed under the State Building Code.

This is standard language but may be redundant due to HUD regulations.

7. The manufactured home shall be placed on an excavated and back-filled foundation and enclosed at the perimeter such that the manufactured home is located not more than 12 inches above grade, and complying with the minimum set-up standards of the adopted state Administrative Rules for Manufactured Dwellings, Chapter 918.

Standard language.

8. The foundation area of the manufactured home shall be fully skirted.

This is archaic language but could be retained for special circumstances (e.g. Katrina cottages) or combined with the other foundation language.



9. The manufactured home shall not be located in the Ashland Historic Interest Area, as defined in the Comprehensive Plan.

Makes sense. Interestingly, one could build a stick-built home that was designed like a manufactured home in any historic district without any special permits... (Church St.!)

10. The manufactured home shall incorporate at least two of the design features listed in 18.20.020 A. above.

[shown below]

1. Dormers
2. Gables
3. Recessed entries
4. Covered porch entries
5. Cupolas
6. Pillars or posts
7. Bay window (min. 12" projection)
8. Eaves (min. 6" projection)
9. Off-sets in building face or roof (min. 16")

Because theses apply to all homes, this may remain in the ordinance.

R-2 and R-3 Conditional Use:

18.24.030

C: Manufactured housing developments subject to Chapter 18.84.

18.84 Manufactured Housing Developments

18.84.010 Purpose

The purpose of this chapter is to encourage the most appropriate use of land for manufacturing housing development purposes, to encourage design standards which will create pleasing appearances, to provide sufficient open space for light, air and recreation, to provide adequate access to and parking for manufactured housing sites, and to refer minimum utility service facilities to appropriate City codes.

18.84.020 General Provisions

A. No person shall establish, operate, manage, maintain, alter or enlarge any manufactured housing development contrary to the provisions of this ordinance.

Ordinance needs changes and this might be reasonable to maintain.

B. In addition to the requirements of this chapter, all manufactured housing developments shall conform to the regulations of ORS Chapter 446, together with such administrative rules as may be adopted from time to time, except where such regulations are exceeded by the requirements of this chapter, in which case the more stringent requirements shall apply.

C. Manufactured housing developments shall be subject to regulations of this chapter and shall be located only on sites approved for use under the provisions of such chapter.

D. Manufactured housing development may be located or relocated only in R-1-3.5 and R-2 zones.

18.84.025 Definitions

The following terms are defined for the purpose of this Chapter and do not otherwise apply to the Land Use Ordinance:

A. Building Envelope. An area, within the property boundaries of a lot or space, within which a permitted manufactured housing or structure can be placed.

B. City Facility. A public service or facility provided, owned and controlled by the City.

C. Diameter Breast Height. The outside diameter of the trunk of a tree, measured 4.5 feet above ground level.

D. Homeowners Association. A homeowners association is an organization formed for the maintenance and operation of the common areas of the development. The membership in the association must be automatic with the purchase of a dwelling unit or other property in the planned development. The association's principal source of funds shall be an assessment levied against each dwelling unit or other property, which assessment shall be enforceable as a lien against the property.



- E. Open Space. A common area designated on the final plans of the development, permanently set aside for the common use of the residents of the development. The open area may be landscaped and/or left with a natural vegetation cover, and in which area no thoroughfares, parking areas, or improvements other than recreational facilities are located. All developments shall provide a minimum of 5% of the total lot area in Open Space.
- F. Pedestrian Path. A graded cleared way, adjacent to the curb at curb level, for individuals who travel on foot.
- G. Unbuildable Area. All areas outside of building envelopes and within open space.

18.84.030 Procedure for Approval

A. Outline Plan:

1. Application for subdivision approval under this Chapter shall be accompanied by a proposed Outline Plan. For developments of less than 10 lots, the Outline Plan may be filed concurrently with the Final Plan, as that term is defined in 18.84.030 B. 4. However, for developments of 10 lots or more prior Outline Plan approval is mandatory.
2. A Type II procedure, as defined in this Ordinance, shall be used for the approval of the outline plan.
3. Contents. The contents for an outline plan shall be as follows:
 - a. A topographic map showing contour intervals of five feet.
 - b. The proposed land uses and approximate locations of the existing buildings to be retained, the proposed structures on the site, the proposed and existing property lines and easements on the site, and existing buildings, structures, and trees greater than six inches in diameter measured at breast height on the properties adjacent to the site, and all buildings within 160 feet of the site boundaries.
 - c. The locations of all proposed thoroughfares, walkways, and parking facilities.
 - d. Public uses, including schools, parks, playgrounds, open spaces and trails.
 - e. Public or private utilities.
 - f. General areas of cuts and fill.
 - g. The location of natural features such as rock outcroppings, marshes, wooded areas, and isolated preservable trees.
 - h. The location and direction of all watercourses and areas subject to flooding.
 - i. Lots or areas for the location of the manufactured housing, with building envelopes showing the permissible location of the dwelling unit.
 - j. Architectural elevations of proposed structures other than manufactured homes, if any. The elevation should be to scale and should include the approximate dimensions of the proposed structures and all attached exterior hardware for heating and cooling.
 - k. A written statement which will contain an explanation of:
 - i. The character of the proposed development and the manner in which it has been designed to take advantage of the Performance Standards Concept.
 - ii. The proposed manner of financing.
 - iii. The present ownership of all the land included within the development.
 - iv. The method proposed to maintain common open areas, buildings and private thoroughfares.
 - v. The proposed time schedule of the development.
 - vi. The findings of the applicant showing that the development meets the criteria set forth in this Ordinance and the Ashland Comprehensive Plan.
4. The Planning Commission shall approve the outline plan when it finds the following criteria have been met:
 - a. That the development meets all applicable ordinance requirements of the City of Ashland.
 - b. That adequate City facilities can be provided including water, sewer, paved access to and through the development, electricity, urban storm drainage, and adequate transportation; and that the development will not cause a City facility to operate beyond capacity.
 - c. That the existing and natural features of the land; such as wetlands, floodplain corridors, ponds, large trees, rock outcroppings, etc., have been identified in the plan of the development and significant features have been included in the open space, common areas, and unbuildable areas.
 - d. That the development of the land will not prevent adjacent land from being developed for the uses shown in the Comprehensive Plan.
 - e. That there are adequate provisions for the maintenance of open space and common areas, if required or provided, and that if developments are done in phases that the early phases have the same or higher ratio of amenities as proposed in the entire project.
 - f. That the proposed density meets the base and bonus density standards established under this Chapter.
5. Approval of the Outline Plan.
 - a. To the extent allowed by statute, the Planning Commission may extend the public hearing to gather more



information.

b. The Planning Commission may approve or disapprove the Outline Plan and application or require changes, or impose conditions of approval which it finds necessary to conform with the standards of this ordinance and the purpose of this Chapter. Approval of the Outline Plan and application, and conditions of approval are final to all issues resolved at that time unless appealed.

c. After an outline plan, which has had a public hearing, is approved, the developer may then file a final plan in phases or in its entirety. However, a final plan may not be filed until the Council adopts any zone change necessary for the development.

d. If an outline plan is phased, 50% of the value of the recreational amenities shall be provided in the first phase and all recreational amenities shall be provided when two-thirds of the units are finished.

B. Final Plan.

1. Procedure for approval. Type I procedure, as defined in this Title, shall be used for approval of final plans, unless on outline plan has been filed, in which case Type II procedure shall be used, and the criteria for approval of an outline plan shall also be applied.

2. The final plan may be filed in phases as approved on the outline plan.

3. If the final plan or the first phase of the outline plan is not approved within eighteen (18) months from the date of the approval of the outline plan, then the approval of the plan is terminated and void and of no effect whatsoever. Extensions may be granted as a Type I procedure.

4. Contents. The final plan shall contain a scale map or maps and a written document showing the following for the development:

a. A topographic map showing contour intervals of five feet.

b. Location of all thoroughfares and walks, their widths and nature of their improvements, and whether they are to be public or private.

c. Road cross sections and profiles, clearly indicating the locations of final cuts and fills, and road grades.

d. The location, layout, and servicing of all off-street parking areas.

e. The property boundary lines.

f. The individual lot lines of each parcel that are to be created for separate ownership.

g. The location of easements for water line, fire hydrants, sewer and storm sewer lines, and the location of the electric, gas, and telephone lines, telephone cable and lighting plans.

h. Landscaping and tree planting plans with the location of the existing trees and shrubs which are to be retained, and the method by which they are to be preserved.

i. Common open areas and spaces, and the particular uses intended for them.

j. Areas proposed to be conveyed, dedicated, reserved or used for parks, scenic ways, playgrounds, schools or public buildings.

k. A plan showing the following for each existing or proposed building or structure for all sites except manufactured housing on approved sites and single-family, detached housing which meets the parent zone setbacks:

i. Its location on the lot and within the development.

ii. Its intended use.

iii. The number of dwelling units in each residential building.

iv. Elevation drawings of all proposed structures except manufactured homes and single-family, detached residences which meet parent zone setback requirements. The drawings shall be accurate and to scale, including all attached exterior hardware for heating and cooling.

l. Manner of financing.

m. Development time schedule.

n. If individual lots are to be sold in the Planned Unit Development, a final plat, similar to that required in a subdivision section of the Land Use Development Ordinance.

o. Final plans for location of water, sewer, drainage, electric and cable T.V. facilities and plans for street improvements and grading or earth-moving improvements.

p. The location of all trees over six inches diameter at breast height, which are to be removed by the developer. Such trees are to be tagged with flagging at the time of Final Plan approval.

5. Criteria for Final Plan Approval. Final plan approval shall be granted unless it is found that it fails to substantially conform with the Outline Plan, and conditions, previously approved. Nothing in this provision shall limit reduction in the number of dwelling units or increased open space provided that, if this is done for one phase, the number of dwelling units shall not be transferred to another phase, nor the open space reduced below that permitted in the outline plan. This substantial conformance provision is intended solely to facilitate the minor modifications from one planning step to another. Substantial conformance with reference to the matters below listed shall be deemed to exist when comparison of the outline plan with the final plan shows that:



- a. The number of dwelling units vary no more than 10% of those shown on the approved outline plan, but in no case shall the number of units exceed those permitted in the outline plan.
 - b. The yard depths and distances between main buildings vary no more than 10% of those shown on the approved outline plan, but in no case shall these distances be reduced below the minimum established within this Title.
 - c. The open spaces vary no more than 10% of that provided on the outline plan.
 - d. The building size does not exceed the building size shown on the outline plan by more than 10%.
 - e. The building elevations and exterior materials are in conformance with the purpose and intent of this Title and the approved outline plan.
 - f. That the additional standards which resulted in the awarding of bonus points in the outline plan approval have been included in the final plan with substantial detail to ensure that the performance level committed to in the outline plan will be achieved.
6. Any substantial amendment to an approved final plan shall follow at Type I procedure and be reviewed in accordance with the above criteria.

18.84.040 Setback Requirements

A. Exterior Setbacks. Manufactured housing sites along the exterior boundary of the court shall be so designed so that any part of a manufactured housing unit shall be set back at least 20 feet from any street or exterior property line.

All setbacks should be the same as for homes in a standard subdivision in R-1, R-2, etc., where setbacks are 15' from the street for the home unless an unenclosed porch, then 10'. Rear yard is 10', then 10' for each story over one story, and side yards, 6' unless abutting a street and then its 10'.

B. Interior Front Yard Setbacks. There shall be a front yard on each manufactured home lot or space of at least 10 feet.

All setbacks should be the same as for homes in a standard subdivision in R-1, R-2, etc., where setbacks are 15' from the street for the home unless an unenclosed porch, then 10'. Rear yard is 10', then 10' for each story over one story, and side yards, 6' unless abutting a street and then its 10'.

C. Interior Side and Rear Yard Setbacks. There shall be side or rear yards of at least six feet. There shall be a minimum separation of 12 feet between manufactured housing units.

All setbacks should be the same as for homes in a standard subdivision in R-1, R-2, etc., where setbacks are 15' from the street for the home unless an unenclosed porch, then 10'. Rear yard is 10', then 10' for each story over one story, and side yards, 6' unless abutting a street and then its 10'.

18.84.050 Design Standards

A. Minimum Court Size. A manufactured housing development shall occupy a site of not less than one acre in size. (ORD 2810, 1998).

The student response to this was: Why not smaller? Small lot configurations? (Portland Living Smart Program encourages this in some areas)

B. Density. The maximum density permitted shall be eight manufactured housing units per acre of developed court area. Manufactured housing which is 14 feet wide or less, or which is less than 800 square feet in size will count as .75 units for this calculation.

This maybe reasonable, in part. The "8 dwellings per acre" is similar to a relatively dense subdivision of standard homes. If homes of smaller dimension (as noted in the current ordinance) were used, the maximum number of homes should be adjusted upward.

C. Manufactured Housing Sites or Lots. All manufactured housing sites or lots must be at least 2,000 square feet in size, at least 35 feet wide, and at least 40 feet deep.

This is consistent with the Salem ordinance and the Corvallis standards are 3,000 sq. ft. Again, perhaps a sliding scale, depending on the size of homes to be placed.

D. Lot Coverage. Maximum lot coverage of any individual manufactured housing lot or site shall be 65% in the R-2 zone and 55% in the R-1-3.5 zone. In addition, the general lot coverage requirements of the parent zone shall also be complied with for the entire project site.

Both the Corvallis and Salem ordinances allow 60% lot coverage.

E. Landscaping.



These sections should be made to be consistent with landscaping standards in effect in residential subdivisions in Ashland, or in the site design standards for multi-family developments

1. All areas of the development not occupied by paved roadways, pathways, parking areas, or not occupied by other facilities shall be landscaped. Areas which contain significant natural vegetation may be left in a natural state, if approved on the final landscaping plans.

2. Manufactured housing developments located in an R-1-3.5 zone shall have 45% of the entire site landscaped. Developments located in the R-2 zone shall have 35% of the entire site landscaped.

F. Fencing. Fencing shall comply with all fencing requirements as per Section 18.68.010 of this Title.

G. Utilities. Provisions for electric, water and sanitary service shall be made in accordance with established City procedures and law, including number, size, quality and location of fixtures, connections and facilities. Telephone and electric lines shall be placed underground.

Include an exemption for approved technologies allowable under current Oregon Code, for example grey-water systems, composting toilets, solar design, and other off-grid systems.

H. All developments are required to provide a minimum of 5% of the total lot area in Open Space.

18.84.060 Manufactured Housing Standards

All manufactured housing units located in approved manufactured housing developments shall comply with the following requirements:

A. Manufactured housing units shall be a minimum of 650 square feet in size.

B. Manufactured housing units shall be at least 12 feet wide.

For A & B use minimum requirements for HUD regulated homes defined under CFR 4150.2 Section 8-0: "...eight feet or more in width and forty feet or more in length... [and] at least 400 sq. ft." Also, there is no minimum for a single family dwelling in Ashland. Why a minimum for this type of home other than to protect the public as HUD attempts?

C. Manufactured housing units shall have the Oregon Department of Commerce "insignia of Compliance." The manufactured housing unit shall be inspected by the City's Building Official and occupancy shall be approved only if the Building Official has determined that the manufactured housing unit has a valid insignia of compliance and has not deteriorated beyond an acceptable level of compliance.

D. Manufactured housing units shall be placed on permanent foundations, with wheels and hitches removed, be fully skirted or bermed, and shall have no uncovered open spaces except for vents of sufficient strength to support the loads imposed by the manufactured housing unit, based on accepted engineering design standards, as approved by the Building Official.

The students commented that exemption for leased land could provide opportunities for the use of "tiny homes." Also, this is archaic language but could be retained for special circumstances (e.g. Katrina cottages) or combined with the other foundation language found elsewhere in the ordinance.

E. Manufactured housing units shall be provided with City water, sewer, electricity, telephone and storm drainage, with easements dedicated where necessary.

Include an exemption for approved technologies allowable under current Oregon Code, for example grey-water systems, composting toilets, solar design, and other off-grid systems.

F. Manufactured housing units shall comply with the thermal envelope requirements for heat loss required by the Oregon State Building Code for single family detached homes.

G. Manufactured housing units shall have a deck or patio area adjacent to the home. The deck or patio shall be constructed of a permanent material and shall be at least 80 square feet in size, with a minimum width of eight feet in its least dimension.

The students thought that this could be cut in half maintaining a minimum width. It could also be on a sliding scale depending on the size of the home. Both Salem and Corvallis require 120 Sq. ft.

H. Each manufactured housing unit shall have a one parking space located on or adjacent to the unit space. The parking space shall be setback at least 20 feet from the street.

I. Notwithstanding the above, any manufactured home legally located within the Ashland Urban Growth Boundary prior to July 1, 1990 may be relocated to an approved manufactured home development, subject to a fire and life safety inspection by the Ashland Building official.

18.84.070 Roadway, Parking and Sidewalk Standards

A. Street Standards. Public streets shall comply with the design standards contained in Chapter 18.88.

B. Private streets shall be a minimum of 20 feet in width, and constructed to the same standards as specified for an alley by the Ashland Public Works Department. A private street may be a dead-end street no more than 300 feet in depth from a higher order road. Adequate turn-around shall be provided according to standards established by the



Planning Commission.

C. Sidewalk Standards. Every manufactured housing development shall have a permanent pedestrian walkway at least 48 inches wide connecting all manufactured housing units to public or private streets, common open spaces, recreational areas and commonly-owned buildings and facilities.

D. Off-Street Parking Standards. Each manufactured housing unit shall be provided with one off-street parking space on each manufactured housing site, setback 20 feet from the street. In addition, guest parking facilities of one parking space for each manufactured housing site shall also be provided on the project site, within 200 feet of the units they are intended to serve, either adjacent to the road or in a off street parking lot. Parking space construction, size, landscaping and design requirements shall be according to Chapters 18.72 (Site Review) and 18.92 (Off-Street Parking).

18.84.080 Storage and Temporary Occupancy of Manufactured Homes

A. A no-charge permit from the Staff Advisor is required for the storage of any manufactured housing unit on the home premises of the owner for any length of time when not used for living purposes; provided, however, that all units so stored shall abide by the yard requirements for accessory buildings in this chapter.

B. No manufactured housing unit shall be stored on a public street except for temporary maneuvering purposes.

C. Temporary occupancy of a manufactured housing unit on premises which do not meet the requirements of this chapter for a manufactured housing development, may be permitted for a period not to exceed ninety (90) calendar days upon the granting of a permit by the City Building Official. Such occupancy may only be allowed in conjunction with the construction of the applicant's residence on the site. Said permit shall not be renewable within a six-month period beginning at the first date of issuance, except with approval of the Staff Advisor.

18.84.090 Non-Conforming Manufactured Housing Developments

This one is tricky. Truth be told, we all thought that the existing "trailer parks" in and around Ashland are providing a very important affordable housing function. While some of them are not terribly attractive, the ordinance should encourage their upgrade, not disallow it. (I recall an article in Planning about this form of housing with some pretty cool upgrades to some very old "trailers.")

A manufactured housing development and an individual manufactured housing unit utilized for living purposes on the effective date of this ordinance or of amendments thereto, which do not conform to the regulations of this chapter, shall be deemed to be non-conforming and may be continued, subject to the following regulations:

A. Routine maintenance and repairs may be performed within the manufactured housing development or upon individual manufactured housing units.

B. No non-conforming manufactured housing development shall be enlarged, remodeled or modernized except in conformance with all requirements of this chapter, except that an area of less than two acres for a development to be enlarged, remodeled or modernized may be approved through the conditional use permit procedure contained in this Title.

C. No manufactured housing unit shall be located on the site of, or substituted for, a non-conforming manufactured housing unit, the use of which has been discontinued, except within a manufactured housing development holding a certificate of sanitation issued by the Board of Health, State of Oregon, issued prior to the effective date of this chapter. Relocation of existing units within the City Urban Growth Boundary are exempted as provided in Section 18.84.060 (I)

D. If a non-conforming manufactured housing development holding a certificate of sanitation issued by the Board of Health, state of Oregon, ceases operation for a period of six months or more, said development shall be considered abandoned and shall be reinstituted only in conformance with the requirements of this chapter.

18.84.100 Special Conditions

A. For the mitigation of adverse impacts, the City may impose conditions. Restrictions may include, but are not limited to, the following:

1. Require view-obscuring shrubbery, walls or fences.

2. Require retention of specified trees, rocks, water ponds or courses, or other natural features.

B. No manufactured housing developments may be located within the Ashland Historic District.

C. No manufactured housing developments may be located, relocated, or increased in size or number of units, within any zones designated for commercial use -- C-1, C-1-D, E-1, CM or M-1.

(Ord 2662, 1992; Ord 3036, 2010)





Some Assembly Required

Using Manufactured Housing in Affordable Housing Development

By Naomi Cytron

OCHI's Infill Homeownership Initiative at 94th & E Street in Oakland

Chances are that when you hear the term manufactured housing, the image that comes to mind is that of a dilapidated trailer park set off on the outskirts of town. But this image does not come close to matching how manufactured housing, which has improved dramatically in quality and design over the past decade while still maintaining low per-square-foot costs, is currently being used to provide affordable housing opportunities. Particularly in areas where the cost of construction has skyrocketed, nonprofit developers are taking advantage of advances in the manufactured housing industry to create new housing options for low- and moderate-income buyers.

There is a great deal of confusion regarding the terminology delineating the various forms that manufactured housing can take, which often leads to the “trailer park” misconception noted above. The outmoded term “mobile home” only refers to a unit built before 1976 under voluntary industry standards, and that product is quite different than a “manufactured home,” which again is distinct from a “modular” or “pre-fabricated” home. Manufactured homes, which are being employed most vigorously in the construction of affordable housing, have a metal or wooden chassis but can be permanently attached to site-built foundations and garages after leaving the factory as a fully assembled unit. Manufactured housing is regulated by construction and performance standards set by the U.S. Department of Housing and Urban Development (HUD). HUD codes supersede local regulations, creating efficiencies through product standardization and avoidance of delays from local inspections.

Modular housing is another form of factory-built housing that is gaining some momentum in use, due in part to architects across the nation using modular units to bring innovative design to the masses in an affordable and earth-friendly manner. Here, house “modules,” such as the kitchen or the

living room, are produced in a factory and then assembled into one unit on-site. These houses are built to local building codes rather than HUD code.

Developers looking to reduce construction costs have caught onto the efficiencies presented by factory-built housing.

Modern factory-built housing offers a cost-effective means of siting housing in a variety of settings. According to the Manufactured Housing Institute, the industry’s trade group, the average cost per square foot for a new manufactured home is less than half that of a site-built home (excluding land costs). More importantly, significant advancements in the industry in engineering, transportation, and materials technologies now allow for the construction of two-story manufactured units with pitched roofs, vaulted ceilings, and customizable exteriors, leading to a product that is indistinguishable from its stick-built counterpart.

Developers looking to reduce construction costs have caught onto the efficiencies presented by factory-built housing. HomeSight, a nonprofit community development corporation in Seattle, Washington dedicated to promoting affordable homeownership opportunities, was one of the first developers in the nation to utilize two-story manufactured units in constructing Noji Gardens, a 75-unit project incorporating single-family manufactured homes and townhomes with site-built houses. Using manufactured units for this development offered both cost and time savings



Market-rate and affordable manufactured homes at Homesight's Noji Gardens in Seattle

for HomeSight while allowing them to match the quality of site-built housing in their other developments. Homes were sold at prices 20 percent lower than Seattle's median home prices, with eligible buyers earning below 80 percent of area median income (AMI). Buyers were offered creative financing packages that included downpayment assistance and property tax abatements.

Nora Liu, Project Manager for Noji Gardens, said that when HomeSight was conceiving this project five years ago, they did not know what the level of acceptance for manufactured housing would be from the community. But the pilot units sold before construction was complete, and the rest of the homes were sold successfully. In addition, Liu said that the manufactured homes have appreciated at the same rate as the site-built homes in the area.

Liu noted that construction using manufactured housing raises some unique technical issues. Bringing housing to a site by truck requires careful consideration of road and site constraints, and the logistics of dropping the houses onto foundations by crane necessitate expertise on the part of the installer. In addition, some of the cost and time savings accrued through the use of manufactured housing at Noji Gardens were lessened by adding site-built elements such as garages. However, Liu said that these site-built additions were what allowed the homes to achieve design standards appropriate to the goals of community development and kept the homes from being just "double-tall rather than double-wide." Despite these limitations, HomeSight has found success in using manufactured housing in their affordable housing developments and is implementing lessons learned from previous projects as they continue to develop the use of manufactured housing.

Oakland Community Housing, Inc. (OCHI), a nonprofit housing developer that produces and manages both rental and homeownership units in Oakland, California, has taken a slightly different approach to utilizing manufactured housing for affordable housing development. In an effort to foster the reuse and revitalization of small and underutilized urban parcels scattered throughout Oakland, OCHI began to acquire empty and blighted lots through the California state law that allows tax-defaulted property to be sold to nonprofit housing developers who intend to convert them into housing opportunities for low-income households. The question for OCHI was how to cost-effectively develop housing on these small, scattered sites.

Eleanor Piez, OCHI's Director of Community Relations, noted that in looking for effective models, they found little local activity that used manufactured units to create affordable housing. But OCHI had strategic interests in orienting their work toward smaller projects with faster development timeframes and also saw the need to grow less dependent on increasingly competitive allocations of public funding. At the same time, they recognized that the manufactured housing industry was becoming more sophisticated and was developing the capacity to work with nonprofit developers with the agenda of promoting overall community health. With this convergence of factors, OCHI's manufactured homeownership development program, the Infill Homeownership Initiative, was developed.

... the potential of manufactured housing should only grow, particularly in areas where creativity is needed to override the obstacles to affordable housing development.

OCHI's first manufactured housing project, dubbed the 94th and E Street project, is a 4-unit development in East Oakland sited on a lot that had been used for upwards of 20 years as a site to dump trash in an otherwise residential neighborhood. OCHI was able to subdivide the lot, construct an adjacent street, and customize the homes on-site so that they fit into the context of the surrounding neighborhood. The homes are being sold at market-rate prices, but OCHI is making the homes affordable to households earning less than 80 percent of AMI through layered homebuyer subsidies. This pricing approach stems from OCHI's goal of economic empowerment for its buyers—their strategy is intended to allow low- and moderate-income homebuyers to build assets through ownership in the same way as higher-income buyers. OCHI has a number of other projects using manufactured units in their development pipeline, ranging from a single-unit infill project to a novel schematic for a multifamily project that would site manufactured units on top of a traditionally constructed, ground-floor commercial structure.



OCHI's multi-story manufactured townhomes under construction at Linden A in Oakland.

Amanda Kobler, Project Manager for the 94th and E Street project, noted that OCHI's infill strategy not only is allowing low-income families to access homeownership opportunities, but is also contributing to overall neighborhood stabilization and the transformation of a "gap-toothed" neighborhood into more a vibrant and cohesive community. In the past year alone, a number of homeowners on the blocks adjacent to the development have invested in home improvements and are rehabbing or even completely rebuilding their homes. "The project has made a huge impact on the street, and the homeowners there are thrilled at what in some ways is a renaissance of East Oakland," said Kobler.

There were some hurdles for OCHI to overcome in pursuing the use of manufactured housing, including the general prejudice against what has been perceived as "trailer homes." Additionally, OCHI found that for manufacturers and dealers of factory-built housing, working with affordable housing developers is relatively uncharted territory. Dealers have historically been set up to sell houses to individuals off the lot the way cars are sold, rather than thinking in terms of a continuing relationship with a developer working to put a number of units on sites with different requirements as far as configurations and exterior aesthetics. While some manufacturers are beginning to staff architects and engineers to

interface with developers to smooth this process, this can raise complications akin to having too many cooks in the kitchen. An understanding of the differences in language and culture of each industry is key to a good working relationship between manufacturers and developers.

A number of the financing elements for manufactured housing are also still a challenge. Because the timeframe for construction on manufactured units is shorter than for traditional construction, standard loan draw-down schedules may not be appropriate, and more flexibility is needed in structuring arrangements with lenders (For information on the financing of another OCHI manufactured project, see Box 3.1: Financing Manufactured Housing). For buyers, unfavorable interest rates are common because homes are often titled as personal rather than real property, and there is still some hesitation on the part of lenders to extend mortgage loans for manufactured homes because there is a lack of understanding of the stability and quality of modern manufactured housing. Another issue is that appraisals are often discounted simply because the units are manufactured or because there are not very many comparable units in the area. On the whole, more education is needed in the finance industry on the value of manufactured products.

In an effort to promote understanding of manufactured housing as an affordable housing issue and to increase its potential to serve as an asset-building housing opportunity, CFED, a national nonprofit that works to expand economic opportunity, has recently launched the Innovations in Manufactured Housing (I'M HOME) initiative. This program, slated to be a 5-year initiative, will provide grants for demonstration projects and offer a platform for collaboration and knowledge sharing among grantees. I'M HOME is meant to draw out best practices in the field, build capacity among developers, and inform the public, practitioners, and policy makers regarding the opportunities and challenges of manufactured housing. Chief issue areas for I'M HOME include breaking stereotypes about manufactured housing, addressing shortfalls in mortgage financing, enhancing long-term security for buyers, and tightening consumer protections. CFED intends to leverage the initial multi-million dollar program fund to incentivize additional investment in the sector (visit www.cfed.org for more information).

While there are certainly challenges in using manufactured housing as part of an affordable housing development strategy, the industry is maturing, and nonprofit developers are successfully incorporating manufactured housing into their development portfolios. With greater levels of resources and attention now being turned toward the approach, the potential of manufactured housing should only grow, particularly in areas where creativity is needed to override the obstacles to affordable housing development. As Kathryn Gwatkin Goulding, Program Manager for I'M HOME put it, "If one is trying to produce affordable housing in an increasingly difficult environment, one needs to bring to bear every weapon in the arsenal...and think outside the box." 