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Dear Planning Commission:

The staff report enclosed is for Code Interpretation CI-16-01, Riverside Home Park. As the City Planning Official, I have invested a significant amount of my time and my staff's time researching this request. This has been a challenging issue to address primarily due to the complex and discretionary nature of development code interpretation and the unique aspects of the Riverside Home Park.

A collaboration of local, state, federal and nonprofit housing authorities created the *Manufactured Home Park Solutions Collaborative Local Agency Toolkit* to guide planning officials in assessing manufactured home parks. As noted in the toolkit, "each manufactured home park is unique with varying levels of park and structure affordability, health, resident ownership, and risk of closure. Despite the many unique traits, manufactured home parks across the state provide an important affordable housing option for community members."

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

The applicant, Mr. Fox, has been both responsive and helpful throughout the planning process. He was instrumental in providing planning staff with a complete Park inventory and providing city employees with access to the property for surveys and analysis.

It is my assessment that the Park is a low-to-medium risk development due primarily to Mr. Fox's experienced management and responsiveness (Table 1). The highest risk category is in Social Characteristics. Over the past three years, the John Day Police Department has responded to 746 calls for service to the Park, approximately ten percent of the City's total 911 call volume. From these calls, the Police Department generated 96 cases with 38 arrests (Table 2).

Riverside is the oldest and first manufactured home park in John Day and has been in operation for approximately fifty years. It remains the largest with 158 individual spaces. The Park is located at the nexus of the John Day River and Canyon Creek and provides an ideal location for affordable housing within city limits.

My hope is that the Commission and the Applicant will be able to reach a compromise that allows the Park to continue to meet the City's need for affordable housing while mitigating future risks.

Sincerely,

Nicholas Green
City Planning Official

Park Risk Assessment Categories

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

Table 1. Risk Assessment of Riverside Home Park

911 Call Volume / John Day Police Department Response

Year	2013-2014	2014-2015	2015-2016
Calls for Service (911)	220	221	305
Cases Pulled (Police Dept.)	28	32	36
Arrests	12	16	10
Arrests by Type			
Parole Violation	2	1	2
Warrant	2	9	2
DUI	1	2	1
Restraining Order	1	0	0
Possession of Controlled Substance (Meth)	1	0	1
Burglary/Theft/Trespass	1	2	0
Disorderly Conduct/Assault/Menacing	1	0	2
Domestic Violence	2	2	2

Table 2. Call Volume and PD Responses for the period from Sept. 1 - Aug 31. of each Calendar Year