



DATE: June 5, 2025
TO: Planning Commission
FROM: Ryan Windish, Community & Economic Development Director
CC: Chrissanda Walker, Associate Planner
RE: Zoning Code Text Amendment – Manufactured Home Park Overlay District

I. BACKGROUND / WHY THE AMENDMENTS ARE BEING PROPOSED

In January the City Council adopted the 2024 Comprehensive Plan Periodic Update as required by the state Growth Management Act (GMA). The 2024 Comprehensive Plan contains antidisplacement policies to protect households and individuals from being displaced by new construction or redevelopment. Displacement mitigation and consideration is required by GMA (RCW 36.70A.070) and is to focus on preservation of affordable housing options for vulnerable communities. The Planning Commission and City Council considered and approved antidisplacement policies including the preservation of manufactured home parks as an affordable housing option.

The Zoning Code text amendment before the Planning Commission would create a Manufactured Home Park (MHP) overlay district that would limit the future use of the land to being only a MHP.

II. DESCRIPTION OF PROPOSAL

The Zoning Code Text amendments would do the following:

- A. Specify that a MHP is the only allowed use in the overlay and would only apply to MHPs existing prior to January 1, 2025. New MHPs would be exempt.
- B. Creates an option for owners of MHPs to apply for a use exception if the overlay zone prevents reasonable use of the property or it is not economically viable. Displacement provisions would be available for residents if the MHP ceased to exist.
- C. Allows for residents of the mobile home park to apply to the City for a Mobile Home Park Overlay Zone if the residents become vulnerable to displacement.

The draft ordinance containing the amendments discussed above is presented in Exhibit A, attached.

III. ANALYSIS

The proposed Zoning Code amendments are consistent with the intent and policies of the Comprehensive Plan, including the policies discussed below.

HOUSING ELEMENT

The proposal is consistent with Comprehensive Plan policies and goals for establishing Housing Element as follows:

1. Encourage public and private reinvestment in older residential neighborhoods and private rehabilitation of housing.

1.7. Support the preservation of existing mobile home/manufactured home parks as affordable housing.

2. Provide a range of housing types for all life stages and economic segments of the Sumner community.

2.5. Plan for an adequate supply of land to accommodate projected housing needs for all income bands.

2.5.1. Through the Comprehensive Plan, Zoning Code, Subdivision code, Design Guidelines, and other regulations and standards, allow for a variety of housing types and lot configurations including government-assisted housing; housing for moderate-, low-, very low-, and extremely low-income households; manufactured housing; multifamily housing; group homes; foster care facilities; emergency housing; emergency shelters; permanent supportive housing; and duplexes, triplexes, and townhomes.

6. Support measures to prevent or mitigate residential displacement through tenant protections and existing programs.

6.1. Consider working with agencies to provide public information on County/State programs on eviction prevention, property tax assistance, mortgage assistance, energy assistance, and foreclosure prevention counseling.

6.2. Consistent with state and federal law, consider supporting tenant protections such as tenant relocation assistance, just cause eviction protections, and notice of intent to sell.

6.3. Consider adopting provisions in the zoning code such as special zones or development standards that protect manufactured home parks over other types of housing developments.

LAND USE ELEMENT

The proposal is consistent with Comprehensive Plan Land Use Element policies and goals specifically:

7. The land use designations and target densities described in the sections below are to be utilized in conjunction with the Comprehensive Plan Map, shown in Figure 9-3. These designations guide the zoning districts in the adopted zoning map. Figure 9-2 summarizes the categories and densities of particular districts.

7.5. Overlay Districts

7.5.7. Manufactured Home Park Overlay: The Manufactured Home Park (MFHP) Overlay district

applies to properties primarily in manufactured home park use where the MFHP was created prior to 2024. The purpose of the overlay is to support the continuation of manufactured homes as the primary use on the property and to help ensure that MFHPs continue to provide an affordable housing option for Sumner residents. The overlay is not intended to apply to new MFHPs but may be applied in the future to MFH subdivisions if residents become vulnerable to displacement and apply to the Director for designation. The overlay is a land use designation only and is not intended to include provisions for rent control or tenant protections.

CONCLUSION: The proposed amendments would implement the Comprehensive Plan policies consistent with state law regarding the preservation of manufactured home parks and retain a viable affordable option for low and moderate income households. The amendments directly implement the policy in that it is a tool to protect against displacement as land becomes more valuable and the redevelopment of existing MHPs to other uses such as high density multifamily becomes more profitable. In addition, the amendments would also create an opportunity for the MHP to be resident owned and managed. Further creating certainty for residents that their housing situation would remain affordable into the future.

IV. SEPA ENVIRONMENTAL REVIEW

The State Environmental Policy Act (SEPA) analysis of the proposed amendment has been completed. A Determination of Non-Significance was issued on _____.

V. PUBLIC & AGENCY COMMENT

No public or agency comments at this time.

VI. STAFF RECOMMENDATION

Staff recommends discussing the proposal and asking questions.

VII. PLANNING COMMISSION RECOMMENDATION

Planning Commission recommendation pending public hearing on July 10, 2025.

VIII. EXHIBITS

A. Draft Ordinance