

Greauxing Resilience at Home

City of Portland, Oregon: **Planning and Zoning for Manufactured Housing Communities**



GEORGETOWN CLIMATE CENTER

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ABOUT THIS REPORT

Louisiana is one of the hardest-hit areas in the United States as extreme weather events and regular flooding become more frequent and intense.¹ These challenges often fall “first and worst” on Black, Indigenous, and People of Color or “BIPOC” and low-income communities.² This is especially true in the U.S. Gulf Coast region and the state of Louisiana.

Over time, these challenges are being exacerbated by population increases and transitions as climate and non-climate drivers (e.g., people moving out of urban centers into more rural areas) influence where people choose — or are able — to live.

In southeast Louisiana, resilient, affordable housing initiatives are critical to ensuring equitable adaptation that takes into consideration the myriad overlapping challenges facing all Louisianans, but especially those living in communities that have long borne a disproportionate burden of risk.

Over a two-year period between fall 2020 and spring 2022, **Capital Region Planning Commission** and **Georgetown Climate Center** partnered with dozens of people from government, private, and nonprofit sectors and community stakeholders in Region Seven of the **Louisiana Watershed Initiative**.³ The result of that partnership effort is **Greauxing Resilience at Home: A Regional Vision**⁴ (Regional Vision), a resource to inform Region Seven’s ongoing work to increase community resilience by promoting affordable housing and nature-based solutions.

Regional and local governments in Region Seven can use the Regional Vision to identify potential legal, planning, and policy tools and projects to increase the affordability and availability of housing and the use of nature-based solutions. In addition, the Regional Vision offers insights for policymakers across Louisiana, throughout the Gulf Coast region, and nationally.

This report is composed of 24 individual case studies developed by Georgetown Climate Center to support the Regional Vision. These case studies describe best and emerging practices, tools, and examples from Louisiana and other U.S. jurisdictions to make progress on these complex and challenging issues. These case studies are intended to provide transferable lessons and ideas for regional and local governments addressing housing and mitigating flood risk as integrated parts of comprehensive community resilience strategies. Collectively, these case studies present a suite, although not an exhaustive list of tools and approaches that can be used to facilitate any of these efforts.

1 STATE OF LA., LOUISIANA CLIMATE ACTION PLAN: CLIMATE INITIATIVES TASK FORCE RECOMMENDATIONS TO THE GOVERNOR 15–16 (Feb. 2022), available at <https://gov.louisiana.gov/assets/docs/CCI-Task-force/CAP/ClimateActionPlanFinal.pdf>.

2 See *id.* at 15–17.

3 The Louisiana Watershed Initiative is an effort to create a paradigm shift in floodplain management towards a strategy that approaches flood risk reduction from a nature-based solutions and land-use-based approach. A part of this approach includes identifying eight separate regional watershed management areas to assist in achieving cross-jurisdictional activities.

Region Seven is one of these eight watershed regions. Region Seven encompasses the upper part of the toe of Louisiana’s boot. It spans eastward from the Mississippi River near Baton Rouge across the Northshore (i.e., north of Lakes Pontchartrain and Maurepas) to Mississippi and along the Mississippi River to the Bonnet Carré Spillway. The region includes 13 parishes and 45 incorporated municipalities.

4 To reflect their connection to Louisiana’s cultural heritage, the project team and members of Region Seven that participated in this process chose to use the word “Greaux,” a French-inspired phonetic spelling of the word “Grow,” to brand this product.

Where possible, all the case studies share a consistent organizational format to allow easier cross-comparison of tools, processes, and takeaways:

- The **Background** section introduces the regional and local context (e.g., location, demographics) for each case study, including the following facing each jurisdiction: extreme weather risks, housing and environmental challenges, and development pressures.
- The **Housing** section focuses on the legal, planning, and policy tools and projects that have been designed and implemented to support the growth and preservation of housing affordability and availability.
- The **Environment** section highlights how vulnerable habitats like floodplains and other open spaces are being restored, conserved, and protected as a part of comprehensive resilience strategies to provide important ecosystem and community benefits like reducing flood risk and creating community assets, such as parks and trails.
- The **Community Engagement** section summarizes how governments have provided different types of public engagement opportunities and how affected residents have contributed to these planning and decisionmaking processes.
- The **Funding** section identifies how the programs, plans, and projects discussed have been funded by federal, state, and local government and private and nongovernmental sources.
- The **Next Steps** section captures the anticipated future actions that featured case study jurisdictions may take in implementing these tools and strategies.
- The **Considerations and Lessons Learned** section concludes with the primary takeaways from each example that other regional and local policymakers and communities may consider when developing or implementing their own housing and resilience strategies using these legal, planning, and policy tools.

A few additional notes about the case studies:

- **The case studies selected prioritize relatable and scalable models from places similar to Louisiana:** Wherever possible, Georgetown Climate Center aimed to acknowledge and lift up the work of jurisdictions and nongovernmental actors in Region Seven and neighboring watershed regions to inspire peer-to-peer sharing and actions from as close to home as possible. These resources are drawn from 12 states, with an emphasis on regions and local areas in the Gulf and Mid-Atlantic: Colorado, Florida, Georgia, Illinois, Iowa, Louisiana, New York, North Carolina, Oregon, South Carolina, Texas, and Virginia. Examples and lessons drawn from these regions are easiest to apply to a Louisianan context because they feature similar geography or analogous impacts from flooding and other climate effects.
- **There are no perfect, “one-size-fits-all” solutions:** While the case studies and resource entries informing the Region Vision are instructive for Region Seven and beyond, none of them are “perfect” examples of how to solve these complex and challenging issues. Georgetown Climate Center found no single case study or resource that provides a point-for-point or model for what Region Seven is trying to accomplish. No other jurisdiction identified is currently trying to integrate housing, flooding, equity, resilience, and population changes together in a single plan, ordinance, or policy. However, some jurisdictions are moving in that direction, or are making progress on discrete elements of what will eventually become a more holistic strategy. Therefore, this report and the Regional Vision draw analogous connections and recommendations that can be combined to facilitate more comprehensive planning and land-use efforts.

The case studies in this report were informed by interviews with practitioners and community leaders in charge of designing and overseeing this work. No statements or opinions, however, should be attributed to any individual or organization included in the *Acknowledgements* section of this report.

It is also important to note that the examples described in each case study are ongoing and the content included in this report is current as of spring 2022. For future updates about these and other case studies and the Regional Vision, please visit [Greaxing Resilience at Home: A Regional Vision](#) and Georgetown Climate Center’s [Adaptation Clearinghouse](#).

City of Portland, Oregon

Planning and Zoning for Manufactured Housing Communities

EXECUTIVE SUMMARY

In recent years, Portland, Oregon has experienced rapid population growth and demographic shifts, resulting in changing housing dynamics — most notably, a decrease in affordable housing. Manufactured Housing Communities (MHC) or manufactured homes, known also as “mobile homes” or “trailers” are a valuable source of unsubsidized affordable housing for thousands of households in Portland. This form of housing is, however, threatened by the effects of climate change and development pressures.

In order to preserve MHC across the city, a campaign to change Portland’s comprehensive plan and zoning laws, led by the community-based organization Living Cully, resulted in amendments to the City of Portland’s comprehensive plan and the creation of the Manufactured Dwelling Park Zone in 2018. The Manufactured Dwelling Park Zone is a new base district that covers all existing MHC in Portland, precluding any other commercial or residential use on the properties and effectively protecting these communities and their residents from park closures. Portland has become a leader in MHC policy and can serve as an example for other cities looking to expand and protect their affordable housing options.

BACKGROUND

Portland, Oregon, is the state’s largest city, located in Multnomah County in the northwestern part of the state. In 2019, the city’s population was estimated at 654,741 and was approximately 77 percent white.¹

In 2019, the median household income was \$71,005, and 13.7 percent of the population was living in poverty.² In 2018, the median income for renter households was \$42,659, while the median income of homeowners was \$92,205 — more than double that of renter households.³

¹ *QuickFacts: Portland City, Oregon*, U.S. CENSUS BUREAU, <https://www.census.gov/quickfacts/portlandcityoregon> (last visited Nov. 20, 2021).

² *Id.*

³ PORTLAND HOUSING BUREAU, 2020 STATE OF HOUSING IN PORTLAND 24 (2020), *available at* <https://www.portland.gov/sites/default/files/2021/2020-state-of-housing-in-portland-report.pdf>.

Over the last decade, housing prices in Portland have increased significantly, leading to decreased availability of affordable housing for low-, moderate-, and middle-income households.

OVERVIEW OF PORTLAND AFFORDABLE AND MANUFACTURED HOUSING PLANS AND POLICIES

The City of Portland's 2035 Comprehensive Plan was adopted in 2016.⁴ Chapter 5 of the Comprehensive Plan is dedicated to housing, outlining the city's intentions to:

- Ensure adequate access to housing for a socially and economically diverse population.
- Support fair, equitable, healthy, resource efficient, and physically accessible housing.
- Establish ways to mitigate gentrification and displacement.
- Concentrate new housing in and around centers and corridors near transit and services to reduce the housing/transportation cost burden.
- Maintain and promote a supply of permanently affordable housing for Portland's most vulnerable residents.⁵

Specific goals within this chapter include providing a diverse and expanding housing supply, increasing equitable access to housing, promoting a healthy and connected city, preserving affordable housing, and increasing access to resource-efficient and high-performance housing.⁶ The plan then details 54 distinct and actionable policies to meet these goals, ranging from housing safety to creating land banks. Of particular interest are the plan's policies on affordable housing, gentrification and displacement, and manufactured housing.

HOUSING

Anti-Displacement and Gentrification

In the comprehensive plan, Policies 5.10–5.19 address housing access, discriminatory barriers to fair and equitable housing, and the impact of gentrification and displacement in Portland.⁷ These

⁴ 2035 Comprehensive Plan and Supporting Documents, CITY OF PORTLAND, OR., <https://www.portland.gov/bps/comp-plan/2035-comprehensive-plan-and-supporting-documents> (last visited Dec. 21, 2021).

⁵ CITY OF PORTLAND, OR., 2035 COMPREHENSIVE PLAN, CHAPTER 5: HOUSING 1 (2020), available at <https://www.portland.gov/sites/default/files/2019-08/05housing.pdf>.

⁶ *Id.* at 5.

⁷ *Id.* at 8.

policies promote preserving communities through the restoration of socioeconomic diversity and cultural stability (5.14); evaluating existing policies' impacts on housing access, gentrification, and displacement (5.12, 5.15); and limiting the involuntary displacement of underserved and underrepresented communities through the use of public investments and coordination with nonprofit housing organizations (5.16). When involuntary displacement occurs, the city will aim to make plans and investments that can be coordinated with programs that enable displaced communities to maintain social and cultural connections (5.18).⁸

Building upon these comprehensive plan policies is the Portland Anti-Displacement Action Plan, a report published in April 2021 to “better understand the City’s policy framework; analytical tools; and regulatory and programmatic efforts to further anti-displacement and equitable community development work.”⁹ This Action Plan addresses many forms of displacement, including direct, economic, cultural, and climate displacement and also examines the role of gentrification in Portland.¹⁰

Manufactured Housing Communities

Manufactured housing, which is generally cheaper to rent and purchase than traditionally built “brick and mortar” or “stick built” housing, is a vital source of unsubsidized affordable housing in Portland. The city defines manufactured housing as “a dwelling unit constructed off of the site which can be moved on the public roadways. Manufactured dwellings include residential trailers, mobile homes, and manufactured homes.”¹¹ Manufactured Housing Communities¹² (MHC) — also referred to as “mobile home parks” or “trailer parks” — are a collection of four or more manufactured homes on a single site.¹³ In Portland, there are currently 57 MHC consisting of over 3,000 households.¹⁴ While the size and location of MHC vary across Portland, the average MHC was built in 1970 on 4.8 acres of land and with 55 spots for dwelling units.¹⁵

Across the country, MHC are threatened by a range of economic and environmental pressures. Historically located in “less desirable” areas, MHCs are often more prone to disaster events and climate change — the effects of which are often compounded by failing infrastructure and other

⁸ *Id.*

⁹ PORTLAND BUREAU OF PLANNING & SUSTAINABILITY, ANTI-DISPLACEMENT ACTION PLAN FOUNDATION REPORT 1 (2021), available at https://www.portland.gov/sites/default/files/2021/final_foundationreport_main.pdf.

¹⁰ *Id.* at 3.

¹¹ PORTLAND BUREAU OF PLANNING & SUSTAINABILITY, MANUFACTURED DWELLING PARKS 5 (2018), available at https://www.portland.gov/sites/default/files/2020-02/manufacturedpark_asadopted_082218.pdf.

¹² The Portland code refers to these types of homes as “manufactured dwelling parks.” However, the more commonly used term “Manufactured Housing Communities” will be used throughout this case study, unless otherwise specified.

¹³ PORTLAND BUREAU OF PLANNING & SUSTAINABILITY, MANUFACTURED DWELLING PARKS 5 (2018), available at https://www.portland.gov/sites/default/files/2020-02/manufacturedpark_asadopted_082218.pdf.

¹⁴ *Id.* at 6.

¹⁵ *Id.*

socioeconomic vulnerabilities. Furthermore, as demographics and housing prices shift across the country and within Portland, MHC managers and land owners generally face societal and economic pressures to sell their land to have it redeveloped at a higher density or for another land use. All of these scenarios threaten to displace current MHC residents.

Policy 5.37 of the Portland comprehensive plan established the importance of mobile home parks (or MHC) as an affordable housing option, encouraging the city to evaluate redevelopment pressures on parks and measures to preserve this low- and moderate-income housing option.¹⁶ This policy, in concert with MHC organizing and activism, enabled the creation of the Portland Manufactured Dwelling Parks Comprehensive Plan and Zoning Amendments in 2018.¹⁷

Planning, Land Use, and Zoning

In 2016, the Oak Leaf Mobile Home Park in the Cully neighborhood of Portland was threatened with closure and sale to a residential developer that planned to evict all residents.¹⁸ This project to develop new residences on the property would have displaced almost 30 households.¹⁹ The Cully neighborhood, where this MHC is located, is of particular importance as it is one of the most racially and ethnically diverse and lowest-income neighborhoods in Portland.²⁰ The Cully neighborhood also suffers from poor infrastructure, a lack of walkability, and transit and greenspace access.²¹ The threat to the Oak Leaf Mobile Home Park mobilized the Cully neighborhood to act to protect not only the mobile home parks in this neighborhood, but all MHC in Portland.

As a result of this campaign to protect MHC, in 2018, Portland amended the city's comprehensive plan and zoning code to adopt a new base zoning district, called the Manufactured Dwelling Park Zone.²² This zone applies to all 57 MHC in Portland and requires that this land only be used for these types of communities and cannot be used for any other type of residential or commercial purpose.²³ This new zoning amendment consolidates all MHC into one base zone to “create consistent land use regulation . . . with development standards to address the unique nature of

¹⁶ CITY OF PORTLAND, OR., 2035 COMPREHENSIVE PLAN, CHAPTER 5: HOUSING 11 (2020), *available at* <https://www.portland.gov/sites/default/files/2019-08/05housing.pdf>.

¹⁷ PORTLAND BUREAU OF PLANNING & SUSTAINABILITY, MANUFACTURED DWELLING PARKS 6 (2018), *available at* https://www.portland.gov/sites/default/files/2020-02/manufacturedpark_asadopted_082218.pdf.

¹⁸ *Manufactured Housing Parks Zoning Proposal*, LIVING CULLY, <http://www.livingcully.org/zoning/> (last visited Nov. 20, 2021).

¹⁹ *Id.*

²⁰ *Cully Neighborhood*, LIVING CULLY, <http://www.livingcully.org/about-living-cully/cully-neighborhood/> (last visited Nov. 20, 2021).

²¹ *Id.*

²² PORTLAND BUREAU OF PLANNING & SUSTAINABILITY, MANUFACTURED DWELLING PARKS (2018), *available at* https://www.portland.gov/sites/default/files/2020-02/manufacturedpark_asadopted_082218.pdf.

²³ *Id.*

[Manufactured Dwelling Parks or MHC] in terms of density, access, setbacks, and landscaping requirements.”²⁴

Of note, the city included provisions in its zoning ordinance to increase the allowed density of most MHC sites.²⁵ Due to spatial restrictions, some MHC may not be able to use all of the additional density granted. To counter this, any unused density can be sold to developers in other areas of the city, creating an economic commodity for MHC landowners.

These provisions — which resemble a Transfer of Development Rights program²⁶ — are intended to preempt potential legal challenges. Such a challenge could result if manufactured park owners asserted a constitutional takings claim arguing that the city deprived them of their private property rights by precluding other land uses or a greater number of manufactured homes in the Manufactured Dwelling Park Zone.

In addition, these provisions can protect residents from being evicted if park owners increase rent to make way for more densely packed manufactured home communities. The financial advantages of this off-site density structure help to overcome these concerns.

As of 2021, no legal challenges have been brought in court against the new zoning ordinance. However, it is not clear whether there have been any transactions initiated involving the additional density.

COMMUNITY ENGAGEMENT

Community mobilization, organizing, and activism were integral to amending Portland’s comprehensive plan and zoning code and protecting MHC in the city.

One of the primary driving forces behind these changes was Living Cully, a coalition of four community development organizations with the goal of improving the quality of life for people of color and low-income people in Portland’s Cully neighborhood.²⁷ Living Cully works to encourage community-led projects and organize people of color and low-income people to fight back against gentrification and displacement.²⁸ When the Oak Leaf Mobile Home Park was originally threatened, Living Cully subsequently sprung into action to protect the park and its residents, developing a campaign to change Portland’s comprehensive plan and zoning laws.

²⁴ *Id.* at 4.

²⁵ *Id.* at 9.

²⁶ For more information about Transfer of Development Rights programs, see the Georgetown Climate Center’s Managed Retreat Toolkit at <https://www.georgetownclimate.org/adaptation/toolkits/managed-retreat-toolkit/transfer-of-development-rights.html>.

²⁷ *About Living Cully*, LIVING CULLY, <http://www.livingcully.org/about-living-cully/> (last visited Nov. 20, 2021).

²⁸ *Id.*

As part of this campaign, MHC residents from Cully conducted outreach to other MHC around the city to inform the people who would be impacted by the zoning changes and garner support across the city. Living Cully also organized direct interactions between MHC residents and Portland political officials. Residents from the Oak Leaf Mobile Home Park and other MHC around Portland gave testimony in front of the city's Planning Commission. The aim of this testimony was to educate Planning Commissioners about these communities and personally combat negative stereotypes of MHC and their residents.

One common misconception held by city officials broadly was that MHC are simply an undesirable housing option of last resort for most people. Public testimonies from MHC residents worked to show the city otherwise. Specifically, many residents spoke about how they choose to and enjoy living in MHC, as they are an affordable housing option that offers strong community ties, autonomy over personal space and property, and options for aging in place. Finally, members of Living Cully and MHC invited city staff and officials to visit Portland's MHC and interact with the residents one-on-one in an effort to underscore the importance of these communities and this type of affordable housing.

In August 2018, after months of planning and coordinating, the Portland City Council voted unanimously to adopt the proposed updates to the city's comprehensive plan and zoning code.²⁹

CONSIDERATIONS AND LESSONS LEARNED

This update to the Portland comprehensive plan and zoning ordinance is a strong example of how city planning and zoning can be used to protect MHC and their residents from displacement and development pressures. As cities like Portland experience population growth and expansion, similar measures can be taken to preserve MHC and support a more resilient housing stock.

As this example also demonstrates, it is necessary to work collaboratively with MHC residents throughout the entirety of decisionmaking processes. Ultimately, they will be the people most affected by MHC-related legal and policy changes and have historically been left out of these processes. Policymakers must include them to create locally appropriate and effective laws and policies.

In addition, this example of policymaking to preserve MHC illustrates the value of working with political officials and city staff to provide them with tangible opportunities to directly engage with MHC residents. Here, city officials and staff heard from residents at public hearings and visited MHC sites in-person. Collectively, these community-driven efforts worked to overcome the negative stigmas often associated with MHC to successfully pass inclusive and equitable legal updates. Jurisdictions with diverse housing and community needs should seek to partner with

²⁹ *Manufactured Housing Parks Zoning Proposal*, LIVING CULLY, <http://www.livingcully.org/zoning/> (last visited Nov. 20, 2021).

nongovernmental organizations and residents to actively listen and learn about the issues before them before making any legal or policy changes. In turn, nongovernmental organizations and residents can strive to initiate similar types of actions on their end. Notably, Living Cully served as a central community hub and organizer bringing people together and mobilizing MHC residents for action. Consolidated support can often have greater force.

Finally, preserving existing MHC and other housing and community types helps to foster both individual- and community-level resiliency. This is especially important for frontline communities including traditionally low-income, BIPOC (Black, Indigenous, and People of Color), and historically marginalized groups and the elderly. By protecting community ties, culture, and existing support systems, residents will be less vulnerable to outside shocks and stressors, such as flooding, natural disasters, and other effects of climate change.