

**PAT 96-43
BoCC SPONSORED
EAR ADDENDUM AMENDMENT
TO THE**

LEE COUNTY COMPREHENSIVE PLAN

THE LEE PLAN

BoCC Public Hearing Document
for the
May 27th Adoption Hearing

***Lee County Planning Division
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**May 15, 1998
LEE COUNTY
DIVISION OF PLANNING
STAFF REPORT FOR**

**COMPREHENSIVE PLAN AMENDMENT
PAT 96-43**

T	This Document Contains the Following Reviews:
T	Staff Review
T	Local Planning Agency Review and Recommendation
T	Board of County Commissioners Hearing for Transmittal
T	Staff Response to the DCA Objections, Recommendations, and Comments (ORC) Report
	Board of County Commissioners Hearing for Adoption

STAFF REPORT PREPARATION DATE: May 20, 1997

PART I - BACKGROUND AND STAFF RECOMMENDATION

A. SUMMARY OF APPLICATION

1. APPLICANT:

LEE COUNTY BOARD OF COUNTY COMMISSIONERS
REPRESENTED BY LEE COUNTY DIVISION OF PLANNING

2. REQUEST:

Amend the Housing Element's objectives and policies in accordance with an analysis of the use of mobile homes for affordable housing purposes.

B. BACKGROUND INFORMATION

This amendment was initiated by the Evaluation and Appraisal Report Addendum Report as adopted by the Board of County Commissioners on February 6, 1999. The report contained the following:

In response to the county's sufficiency response for the EAR, DCA commented that the county should fully analyze mobile homes for affordable housing purposes.

Recommendation: *The following issues should be addressed in the 1996 plan amendment cycle regarding the use of mobile homes or manufactured housing as affordable housing:*

1. *Number of Units in Service in Lee County by Land Use Category*
2. *Cost and Financing*

3. *Social variables*
4. *Conclusions and policy recommendations regarding the use of manufactured housing for affordable housing*

C. STAFF RECOMMENDATION AND FINDINGS OF FACT SUMMARY

1. RECOMMENDATION:

Planning staff recommends that based on the findings of fact, that no changes or amendments be made to the Lee Plan as a result of this analysis. Any other changes to the Lee Plan that are to be made with regard to affordable housing will be made under Plan Amendment 96-44, which relates to the housing element.

2. BASIS AND RECOMMENDED FINDINGS OF FACT:

Mobile homes as affordable housing have several limitations. These limitations do not preclude their use for affordable housing, however, they indicate a policy direction to focus on other forms of housing to meet the affordable housing needs of Lee County's current and future residents.

PART II - STAFF ANALYSIS

A. STAFF DISCUSSION

Mobile homes and manufactured housing are a significant component of Lee County's housing stock. Mobile homes and manufactured housing are often discussed as one and the same, however, there are distinctions in the terms. Mobile homes refers to manufactured housing built prior to 1976. Since that time, HUD and DCA have different registration requirements and factory built housing is now known as manufactured housing. Most manufactured housing cannot be lived in without considerable site work and setup. Recreational vehicles are another form of manufactured housing and would not be considered in this analysis but the units often become permanent housing. Also, recreational vehicle spaces can be considered emergency housing sites should people be displaced in a hurricane, flood, or other disaster.

1. Number of Units in Service in Lee County by Land Use Category

The U.S. Census of Population and Housing, the Florida Department of Health, and the Lee County Property Appraiser maintain various forms of data on "mobile homes" and recreational vehicles. Census data on mobile homes is not finely defined, and aggregates mobile homes, manufactured housing, and permanent recreational vehicles. The Florida Department of Health licenses mobile home and recreational vehicle parks. Licensing data do not include mobile homes on privately owned parcels in the county which

would include some manufactured housing condominium subdivisions or single mobile homes on individual lots. Lee County Property Appraiser data is maintained on all units that are on individual parcels of land, such as mobile home condominium subdivisions. Mobile home parks that rent spaces are considered one tax identification parcel, however, data are available on licensed recreational vehicle parks as a commercial use.

The 1990 U.S. Census reports a total of 33,035 mobile homes in Lee County, with 31,113 in unincorporated Lee County. Most of the remaining units are located in the City of Ft. Myers. Mobile homes comprised 24.5% of all housing in unincorporated Lee County, but only 17% countywide. Statewide, the average percentage of mobile homes is around 20%. Rural counties have much higher percentages of mobile homes, such as Glades County, with 58% mobile homes, or Hendry County with 40% mobile homes.

Table 96-43-01 Mobile Homes 1970-1990 Lee County			
Year	Total Units	Number Mobile Homes	
		Number	Percent
1970	33,342	5,213	17%
1980	74,244	18,105	24%
1990	126,755	31,102	24%

Table 96-43-02 provides data on mobile homes in parks or individually by land use category from the Lee County Property Appraiser and the Planning Division. The number of mobile homes and recreational vehicles are shown, according to type of land use. Recreational vehicles are shown by the number of units or spaces in both residential and commercial type developments. The residential developments are those where the unit is owned by the park and rented. Most commercial parks rent the space only.

The number of vacant acres by land use category is shown to indicate the availability of potentially suitable land for future development of manufactured housing. This is not to say manufactured housing would be encouraged, but only that there is adequate vacant land to serve market demands for this type of housing. Most existing units are located in the urban or suburban land use categories, with the highest number, 11,305, located in the suburban land use category. Manufactured housing is a permitted use in all land use categories that permit residential uses. Recreational vehicle parks are considered a commercial use and would only be permitted in areas where commercial uses are allowed. It is interesting to note that there are 804 mobile homes and 1,224 recreational vehicles in the Density Reduction/Groundwater Recharge land use category. Included among these is the Manna

Christian RV Park where severe flooding damaged or destroyed 210 recreational vehicles in the flooding events of 1995.

There is ample vacant land in Lee County that is allocated on the future land use map for residential uses. This number does not include the acres of vacant land that is currently used for agricultural uses. Manufactured housing planned development can take place in any land use category that permits residential uses. Density and land development requirements may vary , but the use is permitted.

Table 96-43-02				
Mobile Homes and Recreational Vehicles by Land Use Category and				
Number of Acres Allocated for Residential Uses on the Lee Plan Planning Communities Map and Acreage Allocation				
Lee County, 1997				
Land Use Category	Number of Mobile Homes Located in Parks or single lots	Number of Recreational Vehicles		Number of vacant acres in land use category allocated for residential uses
		Residential	Commercial	
Intensive Development	926	159	60	497
Central Urban	8,179	963	448	2,787
Urban Community	3,964	3,268	1,887	11,261
Suburban	11,305	1,838	0	2,827
Outlying Suburban	488	0	120	3,057
Industrial Development	17	158	0	5
Public Facilities	0	0	0	0
Airport Commerce	2	0	0	0
General Interchange	37	0	0	0
University Community	0	0	0	860
New Community	0	0	0	1,708
Rural	264	0	0	2,740
Rural Community Preserve	156	0	0	169
Outer Islands	0	0	0	71
Open Lands	2	0	0	1,004
Density Reduction/ Groundwater Recharge	804	210	1,014	2,349
Wetlands	12	0	0	0

Table 96-43-02 Mobile Homes and Recreational Vehicles by Land Use Category and Number of Acres Allocated for Residential Uses on the Lee Plan Planning Communities Map and Acreage Allocation Lee County, 1997				
Land Use Category	Number of Mobile Homes Located in Parks or single lots	Number of Recreational Vehicles		Number of vacant acres in land use category allocated for residential uses
		Residential	Commercial	
County Totals	26,156	6,596	3,529	29,335

Source: Lee County Planning Division, 1997.

Table 96-43-03 provides data on the number of mobile home and recreational vehicle parks by number of spaces that are licensed by the Florida Department of Health. There are a total of 19,380 mobile home spaces and 11,425 recreational vehicle spaces that are licensed. Some mobile home parks are licensed for recreational vehicle spaces, and some recreational vehicle parks have some mobile home spaces. One form of manufactured housing, known as park models, meet the width requirements of recreational vehicles and can serve as permanent housing in a recreational vehicle park. The Lee County Land Development Regulations limit the length of stay in RV parks to six months.

Table 96-43-03 Mobile Home and Recreational Vehicle Parks, Lee County Licensed by Fla. Dept. Of Health, 1997			
Park Type	Number of parks	Number of spaces*	
		Mobile Home	RV
Mobile Home	102	17,694	1,188
Recreational Vehicle	45	1,686	10,237
Totals	147	19,380	11,425

Note: Some parks have both RV and mobile home spaces. In mobile home parks, there are 1,188 RV spaces. In RV parks, there are 1,686 mobile home spaces.

2. Cost and Financing

While the seemingly lower cost of mobile homes lends to their affordability, there are factors which discourage their availability for low income people. Since Hurricane Andrew, construction standards for manufactured housing have increased costs, narrowing the difference between site built housing and new manufactured housing.

The primary factor of affordability is availability and terms of financing. In order for a low income person or household to purchase a home, they need to have a high loan to value ratio, low down payment, and monthly payments that do not exceed 30 percent of gross family income. In the non-urban areas of the county individual mobile homes can be placed on minimum lots of one acre. The minimum lot size is even larger for some rural areas, such as rural community preserve, which requires a minimum of 5 acres for placement of a mobile home. Low income families cannot afford to purchase large parcels of land.

Obtaining financing for mobile homes that meets these requirements can be difficult. There are few affordable housing programs for which mobile home purchases are an eligible activity.

Underwriting standards among the private lending community lead to the following problems with conventional financing:

A.. Non-park units. Purchasing home insurance for units that are not located in a park or subdivision, that were built after 1976, is difficult. If insurance is not available, a lender cannot issue a mortgage on the property.

B. New park units. New units that are to be located in a mobile home park can be financed up to 90% of loan to value, for a term of 20 years. Low income buyers need 95% loan to value, amortized for 30 years, to maintain affordability. The state HOME program allows financing for the development of mobile home housing for low income families. The program is offered on an annual cycle and competition is statewide for all types of housing projects. However, experience has shown that with current land and development costs, there is little or no difference in constructing mobile home or conventional affordable housing.

C. Existing park units. Existing units that are located in parks are eligible for financing at 85% loan to value, depending on condition, and a term of 15 years. As an example, the down payment required to purchase a 50,000 unit would be \$7,500. The monthly payment of the \$42,500 principle at 9% interest for 15 years would be \$431, not including taxes and insurance, which would bring the monthly payment to an estimated \$600. Low income buyers cannot provide such a large down payment and need the financing for a longer period to maintain affordability.

D. Recreational Vehicles. The purchase of RV's is through consumer loans, which require higher interest than home mortgages. There is no affordable housing assistance available for recreational vehicles.

3. Social Variables

Most of the mobile home parks in Lee County, as in many parts of Florida, are age restricted. Parks that adopt admission policies with age restrictions are exempt from the fair housing laws as long as the policies are followed consistently. Most restrict residency to people over age 55. This greatly reduces opportunities for families to find housing in mobile homes. Mobile home parks that are age restricted provide a good housing choice for those who can afford the initial purchase and any future assessments or maintenance fee increases. Many retirees can afford the initial down payment or purchase outright because they have sold their family home and have a nest egg. This form of housing can be socially satisfying for the elderly with its emphasis on community. However, for the frail elderly, it may not meet the needs for support services. In the event of a hurricane warning, residents of mobile home parks are often advised to evacuate. This is a serious consideration for the elderly or disabled.

Another variable affecting the use of manufactured housing for low income people is the perception of permanency that is a preference when considering a major, lifelong purchase. While new manufactured housing is built to modern building codes and standards, it seems less durable to many. This preference can be seen in many affordable housing programs where lower income clients request houses built from concrete block over wood frame to meet their need for a feeling of permanence and durability for a lifetime.

There may be cultural or ethnic preferences affecting the selection of housing in mobile home parks. For example, studies have shown a lower incidence of African Americans residing in mobile home parks. On the other hand, recreational vehicle parks provide semi-permanent housing for migrant farm workers, many of whom are Hispanic.

B. CONCLUSIONS

Mobile homes in Lee County are in adequate supply to meet current needs. There is adequate vacant land of the appropriate land use categories to permit future development of manufactured housing to meet market demands. The use of mobile or manufactured housing as affordable housing has a number of drawbacks, primarily financing. The financing of mobile homes or manufactured housing is not the same as for conventional dwellings. This excludes lower income families from qualifying for private mortgages. Affordable housing subsidy programs by and large do not provide assistance for mobile homes. The existence of age restrictions on many developments in Lee County further reduces opportunities for families with children to reside in mobile homes or manufactured housing. Program regulations prevent the use of most affordable housing assistance for the purchase or repair of mobile homes or manufactured housing. Mobile homes are much more important for affordable housing in rural counties. As Lee County becomes more urban, it is expected that this form of housing will decrease in proportion to site built housing. It is based on these findings, that no policy changes are warranted regarding the use of mobile homes and manufactured housing for affordable housing.

C. STAFF RECOMMENDATION

No Lee Plan revisions are needed.

**PART III - LOCAL PLANNING AGENCY
REVIEW AND RECOMMENDATION**

DATE OF LPA HEARING: June 26, 1997

A. LOCAL PLANNING AGENCY REVIEW

The LPA asked the staff to explain the negative numbers shown in the "Number of vacant acres in land use category designated for residential uses" column in Table 96-43-02. The staff indicated that the negative numbers were a result of residential allocations in districts that did not allow residential uses. The LPA also asked if age restrictions on housing developments were legal. The staff responded that age restrictions were legal, as long as they are consistent. The LPA commented that if RV parks are to be considered commercial uses for purposes of the 2010 overlay, then floor area ratios and other kinds of standard forms of measurements for commercial uses would not work very well. The commercial designation of RV parks would have to be considered when determining the allocations.

B. LOCAL PLANNING AGENCY RECOMMENDATION AND FINDINGS OF FACT SUMMARY

1. **RECOMMENDATION:** The LPA recommended to forward the staff's recommendation with no change.

2. **BASIS AND RECOMMENDED FINDINGS OF FACT:** The LPA accepted the findings of fact as advanced by the staff.

C. VOTE:

CARRON DAY	<u>ABSENT</u>
RICHARD DURLING	<u>AYE</u>
EARL HAMILTON	<u>ABSENT</u>
RONALD INGE	<u>AYE</u>
BILL SPIKOWSKI	<u>ABSENT</u>
GREG STUART	<u>AYE</u>
MATT UHLE	<u>AYE</u>

**PART IV - BOARD OF COUNTY COMMISSIONERS
HEARING FOR TRANSMITTAL OF PROPOSED AMENDMENT**

DATE OF TRANSMITTAL HEARING: November 5, 1997

A. BOARD REVIEW: There was no public testimony or Board discussion on this plan amendment. Subsequent to review by the LPA, Planning staff revised Table 96-43-02; those revisions are included in this document.

B. BOARD ACTION AND FINDINGS OF FACT SUMMARY:

- 1. BOARD ACTION:** The Board of County Commissioners voted unanimously to transmit this amendment to the Florida Department of Community Affairs.
- 2. BASIS AND RECOMMENDED FINDINGS OF FACT:** The Board of County Commissioners accepted the findings of fact as advanced by the staff.

C. VOTE:

JOHN ALBION	<u>AYE</u>
ANDREW COY	<u>AYE</u>
RAY JUDAH	<u>AYE</u>
JOHN MANNING	<u>AYE</u>
DOUG ST. CERNY	<u>AYE</u>

**PART V - DEPARTMENT OF COMMUNITY AFFAIRS OBJECTIONS,
RECOMMENDATIONS, AND COMMENTS (ORC) REPORT**

DATE OF ORC REPORT: February 5, 1998

A. DCA OBJECTIONS, RECOMMENDATIONS AND COMMENTS

The DCA had no objections, recommendations, or comments concerning this amendment.

B. STAFF RECOMMENDATION

Adopt the amendment as transmitted.

**PART VI - BOARD OF COUNTY COMMISSIONERS
HEARING FOR ADOPTION OF PROPOSED AMENDMENT**

DATE OF ADOPTION HEARING: May 27, 1998

A. BOARD REVIEW:

B. BOARD ACTION AND FINDINGS OF FACT SUMMARY:

1. BOARD ACTION:

2. BASIS AND RECOMMENDED FINDINGS OF FACT:

C. VOTE:

JOHN ALBION

ANDREW COY

RAY JUDAH

JOHN MANNING

DOUG ST. CERNY
