Preservation or Redevelopment:
Options, Conditions and Risks Facing Mobile Home Parks in Anchorage, Alaska, and the Case for Affordable Housing

Background for Housing and Neighborhoods Task Force
Anchorage Assembly Community and Economic Development Committee

Draft

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July 22, 2009

Introduction

According to the Municipal Assessor's Office, 5% of Anchorage's housing units, or 4,700 units, are mobile homes. Mobile homes represent an important affordable housing resource in the community; however, market forces and aging infrastructure in older parks have resulted in numerous closures that have eliminated at least 535 lots in the past six years. Units are often more than forty years old, and unable to be moved without incurring significant damage. Evicted tenants of those parks can lose their lifetime housing investment in a single notice, a result of the tenuous scenario of owning a home but having no control over the land on which the home sits.

Public investment in mobile homes, through housing grant and rehab programs, has too often been directed to substandard mobile homes in leasehold communities. While these programs address health and safety issues, they do little to improve the overall quality of housing stock, much less contribute to asset building potential that comes from traditional homeownership investment.

The Municipality of Anchorage would like to better understand the existing conditions of its mobile home parks, as well as the condition of manufactured homes within those parks. Some parks, based on zoning, condition, size, and location, may be viable neighborhoods that should be preserved as long-term housing. Park preservation examples from around the country, through conversion to cooperatively-owned or land trust models, have demonstrated the benefits of helping residents achieve safe, secure, and asset building potential in housing. A cooperatively owned park would also provide an opportunity for public grant programs to invest in new housing units for low- and moderate-income households, in a location in which long-term land control has been secured. Alternatively, given that mobile homes in Anchorage are one of the most affordable forms of housing, consideration should be made to enact inclusionary zoning policies on mobile home park land; in other words, when the parks themselves are redeveloped, incentives and requirements should be considered so that affordable housing is developed once the old “trailers” are vacated.

This paper examines the number and condition of Anchorage mobile home parks, and creates an index identifying those parks most at risk for closure. It examines the regulatory and market forces that serve as impediments to park preservation. Utilizing lessons learned from other parts of the country, the paper examines the tools, resources, and strategies for preserving and improving parks. Finally, a general discussion of inclusionary housing is included in order to examine redevelopment alternatives that preserve the units of affordable housing, if not the mobile homes themselves.

Affordable Housing in Anchorage

According to the U.S. Department of Housing and Urban Development (HUD), “the generally accepted definition of affordability is for a household to pay no more than 30 percent of its annual income on housing. Families who pay more than 30 percent of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation and medical care.”

Defining affordability in relative terms often leads to confusion among policy makers: what is affordable to one low-income household is not affordable to another. HUD publishes annual income guidelines, by locality, based on median household incomes and adjusted for family size; the majority of programs funded by HUD require families below 80% of area median income (AMI). In 2009, a family of four would have to make below $64,000; an affordable mortgage amount for a family at that level would be $286,000, assuming they spend no more than 35% of their monthly income on housing costs (this amount assumes an interest rate of 5.12%). In order to dispel some of the confusion associated with affordable housing, while still encouraging it, some jurisdictions simplify the definition to meet local needs. For example, the City of Juneau defines as affordable housing as simply a unit that sells below $250,000.

Thus to understand whether housing is affordable in a particular community, we need to understand wages and price of housing. In April 2007, the average price of a single family home in Anchorage was $327,938 and the median price was $287,170, representing an increase of 3.7 and 3.5 percent over the previous year. Between 2000 and 2007, the average selling price of a home increased by more than 71%. Between 2000 and 2006, apartment building rents increased by 49%, with median rents for a two-bedroom apartments increasing from $575 to $925. Wages have not kept pace with the cost of housing; according to HUD, between 2000 and 2005, HUD median income levels have increased only 33%. The result is an increase in the number of households in Anchorage who are considered housing cost burdened. The majority of Anchorage residents, at less than 80% of median income, are housing cost burdened. Finally, according to the Alaska Coalition on Housing and Homelessness, to live in Anchorage and work 40 hours per week, you must earn $17.62/hour to be able to pay no more than 30% of your income towards rent; if you earn the minimum wage you will need to work 74 hours per week. And while evidence nationally is that the current housing bubble will force prices downward, in March 2009 average prices in Anchorage showed only a

0.38% decline from March 2008, as compared to a 11.5% decline nationally (Anchorage House Prices Dip).

It is thus not surprising that many households turn to mobile homes as their housing option. The primary costs of owning a mobile home in a mobile home park in Anchorage is the combination of space rents, utilities, and financing or rent of the unit itself. In 2006, the average monthly space rent in Anchorage parks was $340, and according to the Department of Neighborhoods' weatherization program, primary utility costs (electric and gas, with water and garbage normally covered by space rent) average about $150 per month. If one owes no debt on a mobile home unit, the cost of living in a mobile home is little more than half the cost of a one bedroom apartment.

Many households, including recent refugee and immigrant families, find the privacy, outdoor yard space, and ability to park in one's own driveway more appealing than apartment living. According to the Municipality of Anchorage's Ten Year Plan on Homelessness (2005), Anchorage is particularly deficient in one and four bedroom affordable units. Mobile homes thus offer some of the only affordable housing for large families in Anchorage.

Anchorage Mobile Home Parks

According to the 2000 U.S. Census, 5,911 (6%) of housing units in Anchorage were mobile homes; approximately 4,200 of these units are located in mobile home parks, with the remainder mostly sited on R-5 fee simple lots.[1] There are forty-two mobile home parks in Anchorage. Of these parks, seven contain more than 300 spaces,

[1] While the focus of this paper is on mobile homes in mobile home parks, it is important to note that revisions to the Municpality's zoning code will allow manufactured homes, defined as post-1976 units, to be placed on any lot zoned for single family homes, provided design standards are met. This expansion recognizes the manufactured home as a viable alternative to stick-built housing.

and eight have between 70 and 300 spaces (Table 1). The majority of parks are small, with fewer than 30 spaces on less than five acres. However, the majority of mobile home park spaces are either in large or medium sized parks; in other words, the closure or redevelopment of the ten largest mobile home parks would have a much bigger impact than the closure of the bottom twenty five.

Table 1. Number of Spaces in Anchorage Mobile Home Parks

Number of Spaces	Number of Parks	Number of Spaces	Percent Spaces
More than 300	7	2852	55%
70 to 299	8	1515	29%
Less than 70	26	860	16%
Total	41	5227	

Source: Municipality of Anchorage Property Appraisal, 2007

Age of units, park infrastructure, ownership, and density are important park characteristics. The average year built of a mobile home[2] in one of Anchorage's mobile home parks is 1970. The age is reflective of Anchorage's boom cycles in the 1960s and 1970s – post-WWII and the pipeline years. The result is that a majority of mobile homes are more than 40 years old, and many parks have invested limited resources into infrastructure upgrades over the years. Only 10 parks have units with average year built of 1976 or earlier, and the nine largest parks also happen to have more than 100 spaces. These larger parks are also much more likely to be owned by investors from outside Anchorage and managed as investment properties.

The year a mobile home was built is important for a number of reasons. In 1976, Congress passed the Federal Manufactured Housing Construction and Safety Standards Act, which eventually led to the creation of a national code. Commonly referred to as the

[2] Many communities, including Anchorage, now define mobile homes as those units built before 1976 and most similar to a trailer; manufactured homes are defined as factory built units that must meet the HUD-code (Apgar et al. 2). This paper at times uses the terms interchangeably due to the mix of units in mobile home parks.

“HUD code”, mobile homes are now built to the quality standards in the factory (Apgar et al. 2). Some mobile home parks in Anchorage, recognizing the safety issues with older, pre-HUD code homes, do not accept any new move-ins of those units. In addition, the HUD code was revised in the 1990s to improve energy efficiency, ventilation, and wind resistance (Apgar et al. 7). These dates (1976 and 1994) are often used by local governments and weatherization programs as the cut-off by which to decommission or replace rather than to invest federal or state resources in older units (More on Manufactured Housing Options 5). Nearly half of all mobile homes in parks in Anchorage pre-date the HUD-code, and all but 6% of the units are what some would consider “energy hogs.”

Mobile home parks, on average, contain over nine units per acre. The perception is that these parks are very high density, with crammed single wide units. The reality is that the density in many cases is much lower than what is allowed in the multi-family zoning districts. For example, the R-2M zoning district allows up to 15.8 dwelling units per acre; of the 13 parks zoned R-2M, two exceed the allowable density, and most fall significantly short. Mobile home parks are often less dense than the duplex style site condominiums. The image below shows the Glen Caren mobile home park and an adjacent “site condominium” complex in east Anchorage. The mobile home park contains significantly more open space, landscaping, and setbacks.

Current Anchorage zoning code classifies a mobile home park as a conditional use. The code requires a mobile home park to be a minimum of 2 acres in size and maximum densities of 8 units per acre. Mobile home parks are permitted by conditional use in the R-2M, R-3, R-4, and R-5 zoning districts. Sixteen existing mobile home parks exist as legal noncomformities, because either they are zoned in districts that do not currently allow mobile home parks or they are less than 2 acres in size. This creates what essentially amounts to a disincentive for reinvestment in the older parks, in order to avoid increasing the noncomforming use (AMC 21.55.030). The parks are spread throughout the Anchorage Bowl, with many of the older, smaller parks scattered in the Midtown and Spenard areas (Appendix A); Eagle River and Chugiak have three remaining mobile home parks.

Figure 1: Aerial photo of Glen Caren and site condo

Park Closures

Several recent mobile home park closures in Anchorage illustrate the precariousness of owning a mobile home in a leasehold community. Closures of Alaska Village and Brookside Manor in east Anchorage, Plaza 36 in Midtown, and Lazy

Mountain in Eagle River led to the displacement of hundreds of trailers and their dwellers. Between 1985 and 2005, the number of mobile home park spaces declined from 8,500 to 4,700 (Aurand). Between 2000 and 2008, the number of mobile home parks declined from sixty-six to forty-two. If mobile home owners were lucky enough to find a space willing to take their trailers – some refuse pre-HUD code trailers and do not allow the add-ons to be moved in – they then have to come up with anywhere from $7,000 and $8,400 to tear down the old structure, move, and hook up the trailer in the new space (Aurand). On top of that, older units are often damaged in transport, adding necessary repairs on top of the moving expenses.

The proposed rezone of Alaska Village in 2000, which eventually led to the loss of 535 mobile home spaces, prompted an organized response from community and city leaders.[3] Leaders of Catholic Social Services, the United Way, and grassroots members came together to analyze mobile home parks and coordinate a response to the closures (Manufactured Housing Communities Task Force). The group operated on the assumption that mobile home communities would continue to be rezoned for commercial development, and that few public strategies existed to alleviate the loss of affordable housing. The Task Force advocated for an impact analysis caused by any proposed change of use, arguing that the person who was the cause of the impact help mitigate through providing for relocation assistance; in addition, the Task Force proposed a relocation fund that would be made available when households were displaced.

[3] It should be noted that in the case of Alaska Village, a recent affordable housing development by Cook Inlet Housing Authority, will produce 148 units of rental and homeownership housing on 8 acres of the Alaska Village site.

As a result of this outreach, several changes were made to help ease the displacement. State law was amended to provide tenants of a mobile home park, in the event of a change of use of a mobile home park, a minimum of 270 days notice and forbade eviction between May 1 and October 15 (AS 34.03.225). The law also enables a municipality to establish a mobile home relocation fund. While an official fund was not established, funding has been made available during several closures, through a combination of owner contributions and Community Development Block Grant (CDBG) funds. In practice, however, wading through the eligibility process for federal funding was cumbersome, and assistance has been uneven and inadequate.

The majority of these efforts were designed to be a band-aid to the larger issue of developers pursuing market opportunities to turn mobile home parks into new uses, most of the time commercial. Even small parks are at least a couple of acres, and considering that few permanent structures are required to be demolished, mobile home parks are about the next best thing to vacant land in Anchorage.

Challenges of Mobile Homes and Mobile Home Parks in Anchorage

Preservation of mobile home parks would require a number of significant challenges to be addressed. The age of units themselves, difficulties for individuals to obtain financing in leasehold communities, zoning code violations, and failing infrastructure are all obstacles that would need to be overcome in order that manufactured housing communities in Anchorage become viable, long-term solution to affordable housing.

The average year built of all mobile homes in mobile home parks is 1970. Thus, the majority of units in Anchorage mobile home parks were built prior to the enactment of the HUD Code, and certainly prior to the code revision that addressed energy efficiency and ventilation standards. The Municipality of Anchorage, like other states and local jurisdictions, operates grant funded housing rehabilitation and weatherization programs that invest significant dollars into older units; the programs address critical health and safety issues, but sometimes make minimal impacts on energy efficiencies. Units, not designed for Anchorage climates, other than temporary housing, are showing significant wear and tear from nearly 40 years of Alaska winters. In addition, neglect and lack of maintenance, lack of consistent leveling (especially important in frost heave conditions), and add-ons and additions to units have impacted them structurally. Thus, even if it is possible to preserve the mobile home park for future affordable housing, an aggressive replacement and demolition schedule would need to be undertaken on more than 1800 units simply to replace those pre-HUD code units; only 6% of the total number of mobile homes in parks were built after HUD revised the code in 1994 for energy efficiency reasons.

Table 2. Age of Anchorage Mobile Homes

Year Built	Number of Units	Percentage of Units
1994 - 2005	235	6%
1974 - 1993	2024	49%
1947 - 1973	1871	45%
Total	4130	

The Municipality of Anchorage Weatherization program, since 1997, has completed energy improvements on 4312 units, and 1332 of those units (31%) were mobile homes. In fact, some of those units (59) have been weatherized more than once. The average amount spent weatherizing a mobile home is $3,800. Considering the average value of mobile homes in parks is around $15,000, and in many cases older units are valued under $10,000, the investment as a long-term use of funding is questionable.

Figure 2: Mobile Home Park in Spenard

Significant challenges exist in obtaining financing for individual units, in part based on the distinction by financing institutions between what is termed by Alaska Housing Finance Corporation (AHFC) "Type I" and "Type II" manufactured homes. Type I manufactured homes are those permanently affixed to real property, which offers greater flexibility to lenders. AHFC will finance most Type I homes under its single-family loan programs. Type II homes, on the other hand, are not permanently affixed to real property and are treated as personal property; this is true in the case of homes in mobile home parks as well as on fee simple land but lacking a permanent foundation. Type II homes are financed through AHFC's taxable program, resulting in less favorable terms than the traditional single-family options.

During the 2009 Alaska State Legislative session, Senator Hollis French introduced Senate Bill 153 to establish a process to convert manufactured homes from personal property to real property. The bill requires that manufactured homes be affixed to a permanent foundation and real property, but if passed will provide additional financing opportunities for owners of manufactured homes and a greater chance to see appreciation. While the legislation represents progress on the manufactured housing issue in Alaska, it is not applicable to homes in manufactured home communities (which are not affixed to permanent foundations on real property owned by the resident).

Cook Inlet Lending Center, Inc. (CILC) recently estimated that replacement costs for a new single-wide, mid-grade unit to be $38,400, exclusive of shipping, set-up costs, and removal and disposal of deteriorated units. The price, much higher than the average assessed value of mobile homes in Anchorage, represents the cost of newer units in at least good condition. It may be unlikely that many tenants of mobile home parks would be able to finance both a mobile home park communal purchase and a replacement home at the same time.

The code enforcement program created in the early 1990s successfully addressed a large number of code compliance issues. The program assessed a fee to mobile home park owners to fund code enforcement activities. Mobile home park owners worked to discontinue the program in recent years, feeling that many of the most egregious issues were addressed. However, significant land use and building code issues in parks remain, from abandoned vehicles to non-permitted, non-compliant additions.

In addition, infrastructure in parks shows years of deferred maintenance. Roads and driveways, water and sewer pipes, buried tanks and other contaminants in many cases are in need of upgrade or cleanup. The lack of investment demonstrates that in many cases, owners do not intend to operate the mobile home parks in the long-term.

The Municipality of Anchorage is currently in the process of rewriting its forty-five year old zoning code. Recently adopted use definitions distinguish between a mobile home and a manufactured home. The Title 21 Rewrite now identifies a mobile home as a pre-1976 HUD code unit that is only permitted in the R-5 zoning district and in mobile home parks. Manufactured homes are defined as those built since 1976; they are now permitted in all zoning districts that permit single family detached housing, as long as they are affixed to a permanent foundation and meet the proposed design standards. Additionally, mobile homes (defined as pre-1976) and manufactured homes are both permitted in manufactured housing parks. The code restricts the density of manufactured home communities to eight units per acre, and prohibits placement on a permanent foundation. Nothing in the code would prevent a traditional subdivision or condominium development that placed manufactured homes on permanent foundations; in these cases, the developments would not be considered manufactured home communities and would thus need to comply only with the underlying zoning and subdivision regulations. Thus the greatest opportunity for manufactured housing developments may be as traditional subdivisions, rather than as manufactured housing communities (i.e. parks).

Mobile Home Park Closure Risk Index

Predicting which mobile home parks in Anchorage are most at risk for redevelopment is an inexact exercise. Some parks in Anchorage have been owned by an individual owner for years, while others have recently acquired by investors intending to redevelop the properties. In many cases, the question is not which park will redevelop, but when. Unlike vacant land, the income generated by mobile home parks enables a developer to simply wait until market conditions create a higher opportunity for success in a new development. Recent redevelopments of mobile home parks have demonstrated that a change of zoning was necessary for those conditions to truly ripen; developer expectations that rezonings are politically accepted are likely based on the thought that the municipality is eager to see redevelopment.

It is beneficial to understand the likelihood and scale of potential mobile home park closures for a variety of reasons, not the least of which is the displacement of existing homeowners, who often have few opportunities to move their mobile homes to other parks in Anchorage.

This paper utilized the following factors in creating the risk index:

- Age of units: Parks with mostly pre-1976 units
- Vacancy: High vacancies
- Land value: Those parks assessed based on land value rather than as a commercial operation
- Zoning: Parks zoned high density residential or commercial
- Comprehensive Plan: Long-term plans that foresee higher densities or a different use

Other factors were considered, such as value of individual units, cost per square foot of land, infrastructure, and location. In the case of infrastructure, data is not readily available to fully understand the true condition of parks. Furthermore, while poor infrastructure may indicate a need to redevelop, it likely also indicates that redevelopment will be challenging and costly.

Some correlation exists among the five factors listed above, but all are instructive independently and collectively. For example, high vacancy is tied to whether the park is assessed on basis of land value versus as a commercial property. Those parks with the highest vacancy are likely to be assessed on the basis of land value. However, in some cases, parks with low vacancy that are zoned for commercial use can be assessed on the basis of land. Zoning and consistency with the comprehensive plan can correlate, because there are parts of the comp plan that reflect existing zoning. But exceptions exist in all of these cases, and therefore despite the correlation, enough individual importance is granted to each factor to warrant their inclusion in the index.

A simple score was assigned for the variety of factors (Appendix B), and the parks were grouped into four risk categories: very high, high, moderate, and low. All factors were equally weighted, with the exception that a very high vacancy rate (over 50%) was given twice the weight. The results are summarized below.

Table 3. Anchorage Bowl Mobile Home Park Risk Index

Overall Risk	Parks	Number of Parks	Total Spaces	Total Units	Total Acreage
Very High	Baxter Road, Chugach, East Anchorage, Glacier Terrace, Idle Wheels, Kathy O, King's Kourt, Miller, Nanook, Penguin, Spruce Park, Sunset, Totem, Trails End, Wagon Wheels, Wharton	16	881	725	100.57
High	Alta Vista, Chateau, Four Seasons, Glenn Muldoon, Grizzly Court, L&L, Malaspina, Mayflower, Piper Court, Preferred, Range View, Riviera Terrace, South Park, Top Hand	14	1617	1239	218.34
Moderate	Cupid, Forest Park, Green Acres	3	460	205	54.19
Low	Dimond Estates, Glen Caren, Manoog's Isle, Penland Park, Southwood	5	2170	2038	341.83

All but eight of the thirty-eight parks analyzed were considered to be either very high or high risk of redevelopment. This represents more than 300 acres and more than 2400 mobile home spaces. The number of units and acres represented by the five parks considered low risk exceeds those thirty at-risk parks.

Because all but one category of factors are weighted equally, no one factor is most influential. Parks considered low risk can have only one risk factor to be considered as such. Conversely, parks considered high risk for redevelopment contain at least 4 at risk factors. The index is simple, but provides a basic understanding of the likelihood of redevelopment.

One factor used in the risk index is the consistency with the Comprehensive Plan. In 2005, the Planning Department released a Land Use Plan Map intending to update the currently used land use policy map from the 1982 Comprehensive Plan (the Anchorage 2020 Comprehensive Plan, adopted in 2001, did not include a map update). The Land Use Plan Map is not yet adopted by the Anchorage Assembly, but for purposes of this paper is more relevant than the 1982 map. All but the three lowest residential land use intensities are considered to be inconsistent with a manufactured home park. The primary reason is the code requirement for the park to be a maximum of eight units per acre; even at "low-medium" intensities, zoning and land use goals enable up to fifteen units per acre in these cases, encouraging attached units or multi-family housing. Only six of the parks analyzed were considered to be consistent with the city's long-term vision for community development. It should be noted that this number grows to 21 if the "low-medium intensity" designation is considered appropriate for a mobile home park.

Most of Anchorage's mobile home parks are located in older parts of the Anchorage Bowl. As the city has grown, mobile home parks occupy prime real estate; they are also located in areas that the city would like to see develop into higher density residential areas in order to support a growing population and provide housing near employment centers. Simply put, even if the city were to place a high value on affordable housing, mobile home parks lack the density to implement the Comprehensive Plan.

National Efforts to Expand Homeownership and Park Preservation

As explored above, Anchorage manufactured homes represent a significant stock of affordable housing, but are far from secure. Almost all of the mobile home parks, built decades ago, have substandard infrastructure and are populated by older "trailers" not meeting HUD's manufactured housing code. Because Anchorage's developable land is limited, owners of aging parks in this urban environment face tremendous market incentives to convert their parks to other uses, or sell to developers looking to do so.

State and national efforts recognize the importance of manufactured housing as affordable housing stock. Innovations in Manufactured Housing (I'M HOME), a project of the Corporation for Enterprise Development (CFED), works to advance homeownership through manufactured housing. I'M HOME promotes asset building strategies in manufactured housing by helping residents of leasehold communities become owners of their land, advocating for changes to state and local laws that protect residents, and seeking to ensure financing is available to purchase both parks and individual homeowners.

In 2008, CFED launched a new organization, ROC (Resident Owned Community) USA, which is devoted to promoting resident ownership of manufactured home communities. ROC USA offers technical assistance and timely financing to help residents purchase communities. A study by the Carsey Institute at the University of New Hampshire found that units in resident owned communities sold faster and for more money than units in investor-owned communities (French, Giraud, and Ward 11), presumably due to the perception that resident owned communities are more secure, have lower fees, and provide residents with more control over their residences and improvements.

Manufactured housing is becoming part of the solution to affordable housing in a variety of ways: as an alternative to stick-built housing on fee-simple lots in both rural and urban areas; as new master planned developments or mobile home parks; and through park conversions to resident owned communities. For example, Pepperidge Woods in Barrington, New Hampshire is a 44 home community on 27 acres. With a community center and open space, the development is about 4 units per acre and homes range between $150,000 to $190,000.

Both modular and manufactured housing is being utilized in a number of “infill” housing situations. This application is used on narrow, urban lots, and generally involves stacking the units. HomeSight, a non-profit community development organization outside of Seattle, Washington, completed its Noji Gardens development in 2002. The development is an example of two-story manufactured housing. Such examples may offer only limited application in Anchorage’s older parks; however, as new subdivisions and infill housing, new models of manufactured housing may offer a realistic alternative to stick built housing.

Photo 3: Noji Gardens, Two-Story Manufactured Home, HomeSight

Models for Ownership

The two primary models of ownership for park preservation are third party ownership and resident ownership. In a third party ownership model, a non-profit, often a land-trust, purchases and holds title to the land in trust perpetually.   The mission of the non-profit in this case is generally affordable housing; as such, the non-profit will usually restrict the sale of homes within the community to allow only limited equity, and as such will aim to keep the homes at affordable levels. As a corollary, the organization will screen potential buyers to ensure they are eligible, low-income buyers. These restrictions are common among federal and state run affordable housing programs, but preserving the park while instilling these types of restrictions can be difficult to "sell" to residents.

Thistle Community Land Trust in Boulder, Colorado is an excellent example of the third party model. In 2000, the Mapleton Mobile Home Park Association approached Thistle to join with them to purchase the park. After four years of negotiation, the organization did, preserving 135 homesites on 14 acres in the notoriously high cost area of Boulder. Over 80% of the homes in the Mapleton park were pre-HUD code units. The land trust used bank qualified tax-exempt bonds to purchase and rehabilitate the infrastructure in the park and serves a majority of homeowners who are at 30% of the Area Median Income (Mirpol).

Resident ownership of the land is the primary strategy employed in New Hampshire, Florida, and California. In this model, residents form a non-profit or for-profit cooperative corporation and purchase the land. The land is owned by this separate legal entity, and residents own shares or memberships in the cooperative. The limited equity cooperative or non-profit membership models are set up to restrict the sale of the cooperative to preserve the parks in perpetuity.

The New Hampshire Community Loan Fund perfected this model; in more than 25 years, the loan fund helped create more than 80 manufactured home cooperatives. Because of the 60-day notice law in New Hampshire, organization leaders created a "Conversion Manual" aimed at residents of mobile home parks, providing them with a how-to guide on becoming resident-owners by the end of two months. The organization provides facilitation to assess the financial feasibility of park conversion, willingness of the residents to organize, and financial and legal technical assistance. Paul Bradley, formerly with the New Hampshire Community Loan Fund, now heads up ROC USA, LLC, the national training program for non-profit organizations wishing to convert parks to resident ownership in other states.

A third model for the preservation of manufactured home communities is actually a hybrid of the two previous ones. In this case, a third party non-profit (or in some cases local government) purchases a park to remove the park from the speculative market. Following purchase, the community land trust works with the residents to become resident owners through the establishment of a co-op. The model is important to consider in states that lack right of first refusal laws and where a non-profit organization wants to provide opportunities for affordable housing but does not wish to become the long-term owner or manager of a park. This third model offers the most promise in Anchorage due to the lack of Right of First Refusal protection, the absence of a community land trust, and the fact that park preservation has not been attempted previously.

Right of First Refusal

Residents of mobile home parks are often unaware of the resources and possibilities of becoming resident owned; notice and state right of first refusal laws are an important protection, without which many park conversions would never have occurred. The I'M HOME network, in its resource "Promoting Resident Ownership of Communities," highlights four key legal elements that provide notice or promote ownership of resident owned communities (Promoting Resident Ownership 2):

- Laws granting residents advance notice and right of first refusal when a park is sold;
- Laws granting residents advance notice and requiring a landowner to consider any reasonable offers from residents and negotiate with them in good faith;
- Laws granting residents advance notice when a park is sold, but no other protections;
- Laws providing a tax incentive to landowners to sell communities to residents.

The right of first refusal can provide a win-win to both the landowner and residents. Owners interested in selling get a fair price for their park, and residents gain long-term security and potentially increased value for their homes. In September 2008, I'M HOME reported that two states, Vermont and Massachussetts, have strong protections against the sale of parks, which generally requires notification of all residents, the right of first refusal, and at least a 60 day notice period (Promoting Resident Ownership 6). Thirteen other states have some protections, with another eight working on legislation. I'M HOME is a resource for model resident protection laws and is an important first step to provide residents with the opportunity to become resident owners.

CDBG, HOME, and Brownfield Funding

Two grant resources from the Department of Housing and Urban Development (HUD) provide an opportunity for local government and subrecipients (non-profits that receive these funds) to facilitate resident ownership. Community Development Block Grant (CDBG) funds can be used to acquire a mobile home park, provided a majority of the residents qualify under HUD as low-income households. CDBG can also be used for infrastructure improvements in the park. HOME Investment Partnerships Program funds can also be used to acquire a park, but can only be used towards the proportionate costs of those qualifying homeowners. In other words, if 50% of the residents qualify as low-income households, HOME funds can contribute up to 50% of the costs for the acquisition of the park. Both CDBG and HOME can be provided as either grants or loans; revolving loan funds are established in a number of HUD programs to ensure funds are available for future activities, regardless of funding levels made available through Congress.

The Municipality of Anchorage receives approximately $2,000,000 in CDBG and $1,000,000 in HOME funds annually. The grants are used for a variety of programs, from capital programs for local non-profits to downpayment assistance to low-income home buyers. The Municipality has used a portion of its CDBG funds every year for the Minor Repair Program; a large number of these essential repair grants go to residents of mobile homes.

Finally, the Environmental Protection Agency (EPA) offers funding for assessment and cleanup related to brownfields. The EPA defines brownfields as "real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties protects the environment, reduces blight, and takes development pressures off greenspaces and working lands." The Municipality has received EPA brownfield funding in the past, and the EPA has indicated in the past that mobile home park expansion or redevelopment could qualify for brownfield funding.

Inclusionary Zoning

A growing practice in cities that have clearly identified a challenge to providing sufficient affordable housing for workers and residents (sometimes referred to as workforce housing) has been to create inclusionary zoning policies. "Inclusionary zoning is the market-based tool cities need for producing affordable housing without using tax dollars." (Brunick "Effectiveness" 2). In other words, by requiring a certain percentage of units be affordable, the units are then provided by the market place. According to the Brunick, "With a mandatory inclusionary zoning program, some of these affordable homes could be produced through a combination of density bonuses, flexible zoning standards or other offsets, and the market adjustments and developer creativity that result from a mandate to produce affordable housing" (Brunick "Effectiveness" 4). Thus, while mandatory, providing density bonuses, allowing smaller lot sizes, reducing fees, or expediting processes can help offset the cost to the developer, who otherwise must subsidize the affordable units by raising the price on the market rate units; or in the context of a mixed-use development, have the commercial part of the development subsidize the residential.

Not surprisingly, mandatory inclusionary zoning programs have a better track record of producing affordable units than voluntary programs (Brunick "Large Cities" 2).

Programs around the country generally require between 10 and 20% of the units be "affordable." Some programs only require inclusionary zoning on large developments and establish a minimum threshold of units before the requirements kick in (e.g. 50 in the case of Montgomery County, Maryland or 35 in Fairfax County, Virginia). However, many programs require inclusionary zoning on any size residential development. Programs exist in small and large jurisdictions and the median home prices in these jurisdictions also vary widely. Since 1980, Montgomery County (population 873,341) has produced over 11,000 rental and ownership units and since 1992, Longmont, Colorado (population 71,093) has produced over 600 affordable units (Ross 2).

In addition to providing developer incentives in conjunction with these programs, most programs offer an alternative for a fee-in-lieu or flexibility to provide affordable units at an alternative off-site location. As housing prices in Anchorage increase and the supply of vacant land dwindles, ensuring that adequate affordable housing is provided may become a greater issue. And since many mobile home parks are located in areas where the Comprehensive Plan identifies opportunities for higher density residential and/or mixed use housing, preservation of existing mobile home parks is not always the preference of the local community. However, preserving the units, albeit in different form, while also providing expanded residential opportunities, may make inclusionary zoning or affordable housing set-asides an appealing option.

Recommendations

This paper makes recommendations along two alternative development scenarios. These scenarios are not necessarily mutually exclusive, but each is suited to different types of mobile home parks. The first scenario includes strategies to preserve existing units by converting mobile home parks into a land trust or cooperative model, thus creating long-term secure housing for residents of mobile home parks. This scenario is best suited for those parks that are most consistent with long-term plans. The second scenario acknowledges the reality that a vast majority of mobile home parks in Anchorage will redevelop, and the likelihood that the city will encourage redevelopment in alignment with the Comprehensive Plan. In this case, strategies are recommended to mitigate the impacts on displaced residents and preserve affordable units on the land through inclusionary zoning.

In 2006, the Department of Neighborhoods, along with the Anchorage Community Development Authority applied for a grant from the I'M HOME network to create a revolving park redevelopment program to convert existing parks into co-ops. A small grant was awarded to the Municipality, but efforts to create a revolving park program, either by the city or in partnership with non-profit housing providers, did not materialize. Challenges included the need for significant infrastructure investment and the cost of the land itself, and the reluctance of the city or local non-profit to take the risk. As indicated, only a handful of mobile home parks are in areas that are appropriate in the long-term for low-intensity development.

Along with the past challenges, a new mayoral administration takes office July 1, 2009. It is not known whether this administration would support such an effort. However, as shown around the country, mobile home park conversion does not always need city support; residents purchase their parks through the creation of shares and in some cases, fairly conventional financing. To facilitate conversion, the following recommendations should be further explored:

- Encourage state legislation for residents to have Right of First Refusal to negotiate purchase of park.
- Reach out to parks most likely to be converted (those consistent with existing zoning and long-term land use plans, and with willing owners).
- Connect park residents with conversion potential with third party financing and national resources, such as ROC USA.
- Make CDBG funds available to make infrastructure improvements in parks.
- Utilize HOME funds to finance replacement of substandard units in form of low-interest loan.

The second scenario accepts that redevelopment of existing parks will occur, especially those parks identified as high risk. In these cases, an effort should be made to preserve residential land as residential, but substandard mobile homes should be condemned and destroyed. Mobile home park redevelopment can be strategic to revitalization of neighborhoods, as their single ownership and relatively large tracts are becoming uncommon in the Anchorage Bowl. The city should consider the following recommendations to guide redevelopment:

- Reinstitute a mobile home park code enforcement program. A proactive approach to code enforcement would improve public safety and reduce neighborhood blight. Park owners unable or unwilling to address code issues will consider selling for redevelopment purposes.
- Establish a relocation and housing assistance program for mobile home park residents (owners or renters). Because older, substandard units cannot and should not be relocated to other parts of the community, the program should

focus on time-limited rental assistance, demolition assistance, and/or financing for purchase of new units in an alternate location.

- Explore inclusionary zoning policies, especially on parcels greater than 2 acres and 20 units. With the loss of at least 2,000 spaces imminent over the next 10 – 20 years, the city and affordable housing proponents should proactively develop ways to create new affordable housing.
- Especially when change of zoning is sought, the municipality should consider requiring set-asides of affordable housing units in new housing development. HOME or CDBG funds could be used to off-set costs to the developers, but the requirements would ensure that affordable units are available.
- Provide density bonuses for new developments that include affordable housing.
- Reduce permitting fees or fast track developments that include affordable units.

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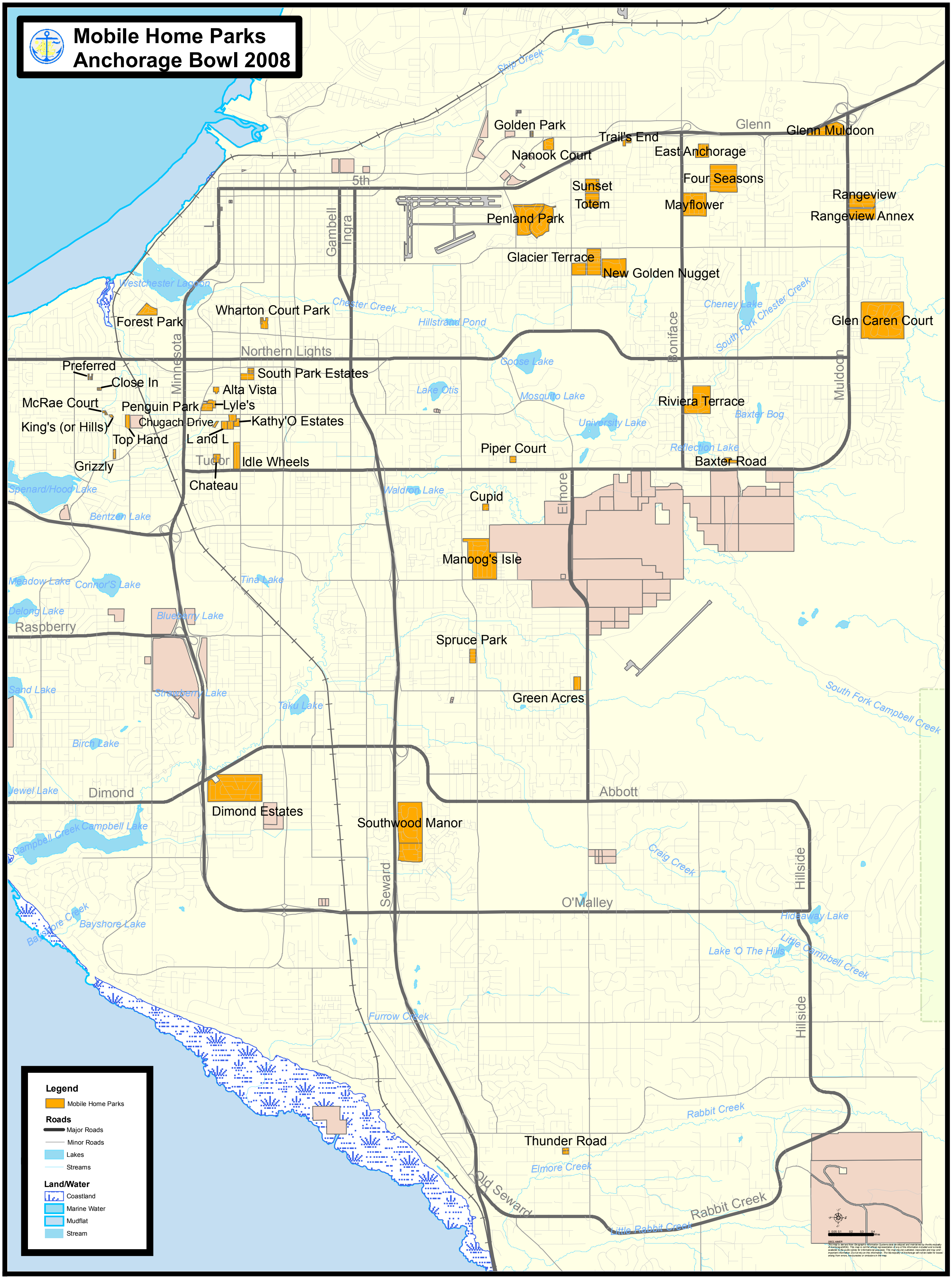
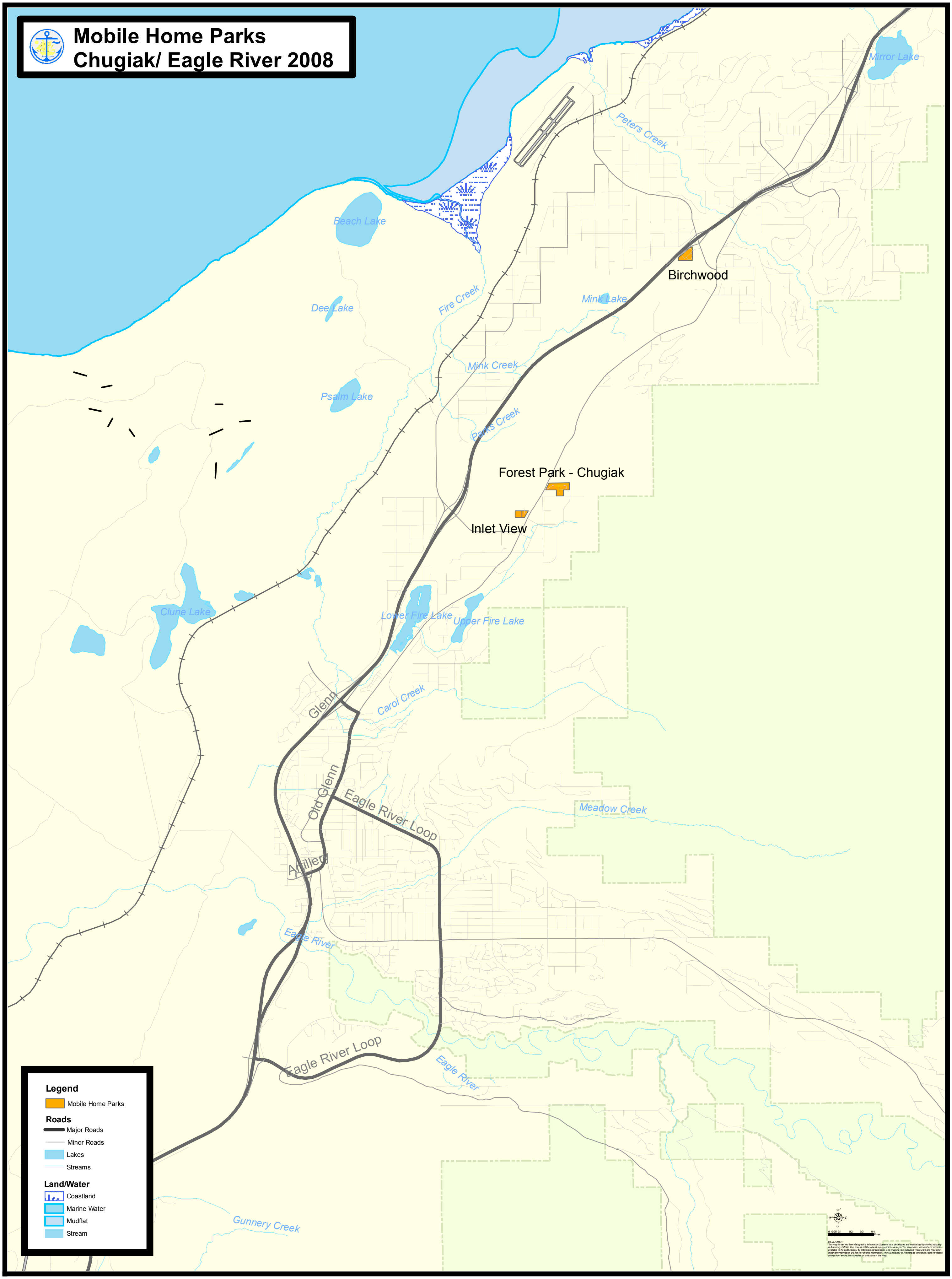
Appendix A

Maps


Mobile Home Parks
Anchorage Bowl 2008
Golden Park
Trail's End
Nanook Court
East Anchorage
Glenn
Glenn Muldoon
Four Seasons
Sunset
Totem
Mayflower
Rangeview
Rangeview Annex
Penland Park
Glacier Terrace
New Golden Nugget
5th
Gambell
Ingra
Ship Creek
Westchester Lagoon
Forest Park
Wharton Court Park
Chester Creek
Hillstrand Pond
Cheney Lake
South Fork Chester Creek
Glen Caren Court
Northern Lights
Minnesota
Boniface
Muldoon
Preferred
Close In
South Park Estates
Goose Lake
Alta Vista
Lake Otis
Mosquito Lake
McRae Court
Penguin Park
Lyle's
Riviera Terrace
Baxter Bog
Chugach Drive
Kathy'O Estates
University Lake
King's (or Hills)
Top Hand
L and L
Piper Court
Reflection Lake
Grizzly
Tudor
Idle Wheels
Baxter Road
Chateau
Spenard/Hood Lake
Waldron Lake
Cupid
Elmore
Bentzen Lake
Manoog's Isle
Meadow Lake
Connor'S Lake
Tina Lake
Delong Lake
Blueberry Lake
Raspberry
Spruce Park
Sand Lake
Strawberry Lake
Taku Lake
Green Acres
South Fork Campbell Creek
Birch Lake
Jewel Lake
Dimond
Abbott
Dimond Estates
Campbell Creek
Campbell Lake
Southwood Manor
Craig Creek
Hillside
Seward
O'Malley
Hideaway Lake
Bayshore Creek
Bayshore Lake
Lake 'O The Hills
Little Campbell Creek
Furrow Creek
Hillside
Rabbit Creek
Thunder Road
Elmore Creek
Old Seward
Rabbit Creek
Little Rabbit Creek
Legend
Mobile Home Parks
Roads
Major Roads
Minor Roads
Lakes
Streams
Land/Water
Coastland
Marine Water
Mudflat
Stream

Mobile Home Parks Chugiak/ Eagle River 2008



Appendix B

Anchorage Mobile Home Park Information

Source: Municipality of Anchorage Property Appraisal, 2006

Appendix B

ANCHORAGE MOBILE HOME PARKS MHP

Name	Address		Owner	Zoning	Comp Plan Consistency	Square Footage	Acres	Density	Land Value	Land Value per Square Foot	Income Vs. Land Value	Units	# Occ	Vacancy Rate	Space Rent	Based on # Units	Avg. Year	Avg. Value
Alta Vista	1100 West 32nd Ave	Spenard	Anchorage	R-2M	No	64870	1.49	16.1	$ 265,600.00	4.1		24	24	0%	$300	22	1967	$8,936
Baxter Road	4235 McLean Pl	East	Anchorage	R-3	No	119,223	2.74	5.5	$ 456,300.00	3.8		15	15	0%	$325	9	1964	$11,223
Birchwood Loop Terrace	22324 Acces St	Chugiak	Michigan	R-5		282970	6.50	6.0				39	39	0%	$300	36	1974	$20,753
Chateau	4203 Wilson St.	Spenard	Palmer	R-2M	No	132091	3.03	9.9	$ 501,400.00	3.8		30	26	13%	$300	24	1973	$19,749
Chugach Dr T Crt	1115 Chugach Way	Spenard	Anchorage	R-2M	No	39000	0.90	12.3	$ 195,100.00	5.0		11	8	27%	$325	5	1962	$6,616
Cupid Tr Ct	2605 E 50th	Lake Otis	Anchorage	R-2A	Yes	88061	2.02	9.9	$ 207,800.00	2.4	Income	20	15	25%	$325	13	1966	$9,012
Dimond Estates	1200 West Dimond Blvd	Dimond	Anchorage	R-2M	No	3356123	77.05	6.8	$ 7,753,600.00	2.3	Income	522	509	2%	$345	503	1974	$22,744
East Anchorage	5800 Glenn Highway	East	Anchorage	R-4	Yes	369824	8.49	7.7	$ 1,333,600.00	3.6		65	49	25%	$375	38	1971	$16,133
Forest Park	1908 Hillcrest Dr	West	Anchorage	R-1A	No	359448	8.25	5.8	$ 959,200.00	2.7	Income	48	48	0%	$400	48	1968	$14,297
Forest Park - Chugiak	16533 Old Glenn Hwy	Chugiak	Arizona	R-5A		463478	10.64	3.7				39				27	1974	$21,236
Four Seasons	5901 E 6th Ave	East	Washington	R-2M	Yes	1705809	39.16	9.4	$ 4,962,200.00	2.9		367	117	68%	$350	125	1976	$27,810
Glacier Terrace	4110 DeBarr Rd (1553 Bragaw	East	Anchorage	R-3	No	1192931	27.39	5.6	$ 3,612,100.00	3.0		154	136	12%	$355	134	1970	$14,291
Glen Caren	2221 Muldoon Rd	East	Anchorage	R-2A	Yes	3581987	82.23	5.8	$ 4,516,700.00	1.3	Income	478	396	17%	$325	412	1986	$32,561
Glenn Muldoon	7505 Glenn Highway	East	Anchorage	R-4	No	769891	17.67	7.2	$ 2,451,900.00	3.2	Income	128	102	20%	$352	105	1975	$22,461
Green Acres	4030 Lore Rd	Abbott Loop	Anchorage	R-1	No	207435	4.76	5.2	$ 255,000.00	1.2	Income	25	25	0%	$325	22	1966	$12,250
Grizzly T Court	4222 Spenard Rd	Spenard	Anchorage	R-1	No	57534	1.32	18.9	$ 537,100.00	9.3		25	22	12%	$325	5	1960	$3,924
Idle Wheels	4100 Arctic Blvd	Spenard	Anchorage	R-3	No	390000	8.95	8.5	$ 1,359,300.00	3.5		76	74	3%	$325	69	1969	$15,238
Kathy O 2	3724 Arctic Blvd	Spenard	Anchorage	B3	Yes	191770	4.40	10.9	$ 973,200.00	5.1		48	48	0%	$325			
Kathy O' Estates	909 Chugach Way	Spenard	Anchorage	R2M	Yes	113718	2.61	11.5	$ 373,000.00	3.3	Income	30	30	0%	$325			
Kathy O' Combined						305488	7.01	11.1				78				79	1972	$10,119
King's Kourt	2617 McRae Rd	Spenard	Anchorage	R-1	No	21750	0.50	32.0	$ 298,100.00	13.7		16	12	25%	$350			
L & L (Franks)	1003 Chugach Way	Spenard	Anchorage	R-2M	No	110687	2.54	18.5	$ 426,400.00	3.9	Income	47	44	6%	$350	5	1964	$7,314
Lazy Mountain	11431 Old Glenn Hwy	Eagle River	Anchorage	RO		441350	10.13	4.8				49				31	1966	$9,402
Malaspina	1545 Hoyt St.	East	Anchorage	R-3	No	946053	21.72	6.4	$ 2,813,000.00	3.0		138	132	4%	$355	129	1977	$23,614
Manoog's Isle	2611 Pago Pago Ave	Lake Otis	Michigan	R-2M	No	2294519	52.67	6.9	$ 6,591,900.00	2.9	Income	364	360	1%	$355	353	1975	$22,981
Mayflower	1001 Boniface Pkwy	East	Anchorage	R-3	No	2497189	57.33	3.7	$ 6,517,500.00	2.6		210	203	3%	$393	209	1982	$31,665
Miller	3402 Dorbrandt	Spenard	Anchorage	B-3, R-2M	No	94060	2.16	11.6	$ 625,300.00	6.6		25	21	16%	$325	21	1968	$11,786
Nanook	3500 Mountain View Dr	Mountain View	Anchorage	R-3	No	263200	6.04	8.6	$ 960,400.00	3.6		52	34	35%	$310	36	1968	$12,926
Penguin	3407 Spenard Rd # 3	Spenard	Washington	B-3	No	178566	4.10	13.9	$ 1,782,400.00	10.0		57	57	0%	$325	48	1971	$13,523
Penland Park	801 Airport Heights Dr	Airport Heights	Michigan	D2	No	2414969	55.44	7.0	$ 5,824,300.00	2.4	Income	389	370	5%	$375	366	1977	$25,793
Piper Court	4222 Piper St.	East	Cordova	R-3	No	88061	2.02	11.9	$ 346,700.00	3.9	Income	24	23	4%	$325	20	1970	$13,432
Preferred Trl Ct	2906 W 30th Ave.	West	Anchorage	R-2M	No	136272	3.13	4.8			?	15	15	0%	$350	14	1964	$8,758
Range View	705 Muldoon Rd	East	California	R-3	No	1378426	31.64	10.0	$ 3,699,400.00	2.7	Income	315	275	13%	$380	168	1969	$14,396
Range View Annex					No											82	1967	$12,837
Riviera Terrace	3307 Boniface Pkwy # 9b	East	Anchorage	R-2M	Yes	1288080	29.57	6.3	$ 3,414,200.00	2.7		185	155	16%	$325	155	1971	$17,553
South Park	3007 Arctic Blvd	Mid-Town	Anchorage	R-4, B-3	No	213876	4.91	16.9	$ 1,447,300.00	6.8	Income	83	79	5%	$350	50	1963	$8,653
Southwood	9499 Brayton Dr # 68	South	Michigan	R-2A	Yes	3242775	74.44	5.6	$ 7,521,300.00	2.3		417	403	3%	$385	391	1981	$29,714
Spruce Park	7140 Lake Otis Pkwy	Lake Otis	Anchorage	B-3	No	180000	4.13	10.2	$ 1,037,500.00	5.8		42	33	21%	$325	33	1967	$11,759
Sunset	4200 E. 4th Ave.	East	Anchorage	R-2M	No	396715	9.11	10.1	$ 1,427,700.00	3.6		92	69	25%	$340	67	1968	$13,013
Top Hand	2409 Mcrae Rd	West	Anchorage	R-1	No	122600	2.81	9.2	$ 468,100.00	3.8		26	22	15%	$325	17	1970	$15,610
Totem	701 S Klevin St # 25ab	East	Anchorage	R-2M	No	432960	9.94	11.1	$ 806,700.00	1.9		110	80	27%	$340	71	1964	$9,923
Trails End	100 McCarrey St.	East	California	R-3, R-1	No	100359	2.30	11.3	$ 520,700.00	5.2		26	23	12%	$380	17	1967	$11,170
Wagon Wheels	4220 Baxter Rd	East	Anchorage	R-3	No	119157	2.74	11.3	$ 489,800.00	4.1		31	12	61%	$325	11	1961	$8,564
Wharton	2208 Eureka St.	West	Anchorage	R-4SL	No	177400	4.07	7.6	$ 659,900.00	3.7		31	24	23%	$325	20	1970	$14,233
Total						30625187	703.06	9.4				**4888**	**4129**	16%	**$300**			
Average															**$340**		1970	$15,560

Appendix C

Anchorage Mobile Home Park At-Risk Index

Appendix C - Mobile Home Park Risk Index

Park	Age of Units	Vacancy	Commercial vs. Land Value	Zoning	Comp Plan	Total	Overall Risk	Comp Plan Consistency
Alta Vista	2	0	2	0	2	6	High	No - High Density
Chateau	2	1	2	0	2	7	High	No - Low/Medium Density
Four Seasons	0	4	2	0	0	6	High	Yes - Low Intensity
Glenn Muldoon	0	2	0	2	2	6	High	No - Medium Intensity
Grizzly T Court	2	1	2	0	2	7	High	No - Neighborhood Center
L & L (Franks)	2	1	2	0	2	7	High	No - High Density
Malaspina	0	0	2	2	2	6	High	No - Medium Density
Mayflower	0	0	2	2	2	6	High	No - Low-Medium and Medium
Piper Court	2	0	0	2	2	6	High	No - Low-Medium
Preferred Trl Ct	2	0	2	0	2	6	High	No - Low-Medium
Range View	2	1	0	2	2	7	High	No - Medium Density
Riviera Terrace	2	2	2	0	0	6	High	Yes - Low Intensity
South Park	2	0	0	2	2	6	High	No - High Density
Top Hand	2	1	2	0	2	7	High	No - Low-Medium
Dimond Estates	0	0	0	0	2	2	Low	No - Low/Medium Density
Glen Caren	0	2	0	0	0	2	Low	Yes - Low Intensity
Manoog's Isle	0	0	0	0	2	2	Low	No - Medium Density
Penland Park	0	0	0	0	2	2	Low	No - Low-Medium and Medium
Southwood	0	0	2	0	0	2	Low	Yes - Low Intensity
Cupid Tr Ct	2	2	0	0	0	4	Moderate	Yes - Low Intensity
Forest Park	2	0	0	0	2	4	Moderate	No - Low Intensity Detached
Green Acres	2	0	0	0	2	4	Moderate	No - Low Intensity Detached
Kathy O' Estates	2	0	0	2	2	6	Moderate	No - High Density
Range View Annex	2				2	4	Moderate	No - Medium Density
Baxter Road	2	0	2	2	2	8	Very High	No - Low/Medium Density
Chugach Dr T Crt	2	2	2	0	2	8	Very High	No - High Density
East Anchorage	2	2	2	2	0	8	Very High	Yes - Low Intensity
Glacier Terrace	2	1	2	2	2	9	Very High	No - Medium Intensity, Commercial
Idle Wheels	2	0	2	2	2	8	Very High	No - Medium Intensity
Kathy O 2	2	0	2	2	2	8	Very High	No - High Density
King's Kourt	2	2	2	0	2	8	Very High	No - Low/Medium Density
Miller	2	2	2	1	2	9	Very High	No - Low-Medium
Nanook	2	2	2	2	2	10	Very High	No - Medium Density
Penguin	2	0	2	2	2	8	Very High	No - High Density
Spruce Park	2	2	2	2	2	10	Very High	No - Low-Medium
Sunset	2	2	2	0	2	8	Very High	No - Low-Medium
Totem	2	2	2	0	2	8	Very High	No - Low-Medium
Trails End	2	1	2	2	2	9	Very High	No - Medium Density
Wagon Wheels	2	4	2	2	2	12	Very High	No - Low-Medium
Wharton	2	2	2	2	2	10	Very High	No - High Density
Birchwood Loop Terrace	0	0	2	0		2		
Close-In								No - Low/Medium Density
Forest Park - Chugiak	0		2	0		2		
Kathy O' Combined	2	0				2		
Lazy Mountain								

Risk Factors			
Vacancy	4	VH	More than 50%
	2	H	16 - 50%
	1	M	6 - 15%
	0	L	0 - 5%
Age of Units	2	H	Pre-1976
		M	
	0	L	Post-1976
Land Value	2	H	Land
	0	L	Commercial
Zoning	2	H	R-3 and higher; commercial
	0	L	R-2M, R-1
Comprehensive Plan	2	H	Not consistend
	0	L	Consistent
Other Possibilities: Unit value, Land value, Location, Square footage			
Overall Risk			
	8 to 12	Very High	
	6 to 7	High	
	3 to 5	Moderate	
	1 to 2	Low	