



The City is conducting this public meeting using a hybrid model. The public is welcome to attend tonight’s meeting in-person at Sumner City Hall Council Chambers (1104 Maple Street) or virtually by using the meeting access link below:  
Link to join Zoom Webinar: <https://sumnerwa-gov.zoom.us/j/88655116217>  
Or by phone: 253 215 8782 (Tacoma)  
Webinar ID: 886 5511 6217

**CALL TO ORDER**

**FLAG SALUTE**

**ROLL CALL**

Sharon Fochtman, Mark Isaacs, Kelly Locke, Bill Moody, Rob Healy, Amy Huo, Mark Malcolm

**APPROVAL OF MINUTES**

1. Planning Commission meeting minutes-July 10, 2025

**PUBLIC COMMENT**

*The public may comment on topics that are not on the meeting agenda, virtually or in person. The public is strongly encouraged to submit comments via email to [chrissandaw@sumnerwa.gov](mailto:chrissandaw@sumnerwa.gov) no later than 5pm on the day prior to the meeting. Your comments will be read into the record and limited to 3-minutes.*

**PUBLIC HEARING**

**UNFINISHED BUSINESS**

1. Manufactured Home Park Overlay Zone Text Amendment - ACTION

**NEW BUSINESS**

**CORRESPONDENCE**

**COMMISSION COMMENTS**

**STAFF COMMENTS**

## **ADJOURNMENT**

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**SUBJECT:** Planning Commission meeting minutes-July 10, 2025

**CATEGORY:** Motion

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**BUDGET IMPACT:**

Expenditure Required: None

Within Budget Allocation: N/A

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**ATTACHMENTS:**

1. 20250710 PC-Meeting Minutes-DRAFT

**STAFF CONTACT:** Chrissanda Walker, Associate Planner

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**SUMMARY BACKGROUND:**

PC Meeting minutes from July 10, 2025. Public Hearing held on the proposed Manufactured Home Park Overlay zone

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**COUNCIL COMMITTEE/STUDY SESSION:**

**MEETING/STUDY SESSION DATE:**

**COMMITTEE RECOMMENDATION:**

**STAFF RECOMMENDATIONS/MOTION:**

Move to approve the July 10, 2025 meeting minutes



## **MEETING MINUTES**

### **CALL TO ORDER**

The meeting was called to order at 6:01 pm by Chair Issacs

### **ROLL CALL**

Commissioners Present: Moody, Issacs, Healy, Malcolm, Locke, Fochtman, Huo  
Excused Absences:

### **APPROVAL OF MINUTES**

1. Planning Commission meeting minutes-June 5, 2025

Moved to approve Moody, Seconded Healy; **passed unanimously**

### **PUBLIC COMMENT** *(The public may provide comments that are not on tonight's agenda)*

**None Appearing**

### **PUBLIC HEARING**

#### **Chair opens the hearing at 6:06 pm**

Ryan Windish, Community and Economic Development Director provided a brief presentation on the proposed zoning code text amendment for the manufactured home park overlay zone.

Commissioner Isaacs asked about overlay exception application process and staff advised about the process.

Commissioner Healy asked about right of first refusal and staff described it.

Staff provided the Commission with an updated memo for the written comments received and read a summary of three (3) comments to the Commissioners into the record.

Chair Issacs opened the floor to the public to submit any oral testimony

1. Name: George Rudolph, Location/address:15315 49<sup>th</sup> Ct St E Sumner  
 Topic: Displacement assistance  
 Summary of comment:  
 Mr. Rudolph wanted to know about displacement resources and asked about infrastructure break down within the Double A Mobile Park. He expressed worry about the residents and asked what resources there may be for the residents from the City. He was referred to staff for questions.
  
2. Name: Lenora Bruce, Location/address: Double A Mobile Park  
 Topic: Questions  
 Summary of comment:  
 Ms. Bruce had questions and was directed to staff. She was in favor of the overlay and advised she did not want to move.
  
3. Name Roxanne Tomui , Location/address: 15222 50<sup>th</sup> St E Sumner  
 Topic: Populations of Mobile Parks  
 Summary of comment:  
 Ms. Tomui expressed that there are strict rules about the upkeep of the mobile home parks. She advised that the mobile home park was good for populations with limited income.
  
4. Name Spencer Thomas, Location/address: 15226 50<sup>th</sup> St E Sumner  
 Topic: Displacement assistance  
 Summary of comment:  
 Mr. Thomas expressed that the residents were unsure what to do in the instance of displacement and advised that he enjoys the culture of the park.
  
5. Name: Stephen Barnet, Location/address:713 Waterway Drive, Northern Palm Beach, FL  
 Topic: State of the Double A Mobile Park  
 Summary of comment:  
 Mr. Barnet advised that the park's infrastructure is dated and the rents are very low. He advised there are issues with water leaks and zoned at low density residential, advises overlay does not make sense to him as it is restrictive.

Staff recommended that the Commission table the topic until the next meeting.

**Chair closed the hearing at 6:35 pm**

## **UNFINISHED BUSINESS**

1. Manufactured Home Parks Overlay -ACTION

Chair opened the discussion with the Commission on the action item Manufactured Home Park overlay zone.

**Discussion ensued.**

Commissioner Huo asked about RCW 59.20.080 (1)(e) regarding relocation assistance and wanted to know if the proposed amendment conflicted with the statute. She advised that there is a similar ordinance in Seattle and Tumwater. She wanted to know about reasonable exceptions to overlay and felt as it is overlay is too vague.

Commissioner Malcolm commented that the overlay was for protecting the residents of the mobile home parks.

**NEW BUSINESS**

1. None before the Commission

**CORRESPONDENCE**

None

**COMMISSION COMMENTS**

Commissioners made comments about mobile home parks for vulnerable populations, and expressed agreement with the public speakers about their concerns. Commissioners expressed that they would want to see the mobile home parks.

**STAFF COMMENTS**

Staff advised about Music Off Main starting this Friday in Sumner.

**ADJOURNMENT**

Moved to adjourn Malcolm, Seconded Healy; all in favor; meeting adjourned at 6:44 pm.



**DATE:** August 7, 2025  
**TO:** Planning Commission  
**FROM:** Ryan Windish, Community & Economic Development Director  
**CC:** Chrissanda Walker, Associate Planner  
**RE:** Zoning Code Text Amendment – Manufactured Home Park Overlay District

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**I. BACKGROUND / WHY THE AMENDMENTS ARE BEING PROPOSED**

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

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

The Planning Commission held a public hearing on July 10, 2025 on this Zoning Code text amendment and received comments from residents of manufactured home parks and owners. As a result of comments from the public, the Planning Commission, and the City Attorney, staff is proposing additional edits to the draft ordinance.

**II. DESCRIPTION OF PROPOSAL**

The Zoning Code Text amendments would do the following:

- A. Specify that a MHP is the only allowed use in the overlay and would only apply to MHPs existing prior to November 1, 2025. New MHPs would be exempt.
- B. Removes the reference to an “economically viable” study and determination and leaves it as making a case that there is no “beneficial use” of the subject property. “Beneficial use” is the standard used by the courts to determine whether a zoning regulation takes private property without compensation in violation of the 5th Amendment of the US Constitution. It is a rather high bar and would typically require that the property owner show that there is little to no economic use available under the current zoning restrictions. This legal review is also why it is necessary for the use exception to be reviewed by a Hearing Examiner, typically a land use attorney, rather than the City Council. Displacement provisions would be available for residents if the MHP ceased to exist.

- C. Changes the Type VI.A decision to a Hearing Examiner decision appealable to the court. This is not a City Council decision.
- D. Adds further details and requirements for the relocation plan and assistance to tenants.

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

**III. PUBLIC & AGENCY COMMENT**

Public and agency comments are included in Exhibit B.

**IV. STAFF RECOMMENDATION**

Move to recommend that the City Council approve the Ordinance as presented pertaining to creating a Manufactured Home Park Overlay Zone.

**V. EXHIBITS**

- A. Draft Ordinance
- B. Public Comments

**ORDINANCE NO. XXXX**

**CITY OF SUMNER, WASHINGTON**

**AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON, AMENDING ZONING CODE ESTABLISHING A MANUFACTURED HOME PARK OVERLAY ZONE AND AMENDING CHAPTER 18.34, MANUFACTURED HOME PARKS, AND AMENDING SECTIONS 18.34.010; 18.34.020; 18.34.030; 18.34.040; 18.34.050; 18.34.060; AND CREATING A NEW SECTION 18.34.090.**

**WHEREAS**, the Washington State Growth Management Act requires that the City of Sumner take measures to identify local policies and regulations that result in the displacement of vulnerable populations (RCW 36.70A.070(2)(e)); and to implement policies and regulations that begin to undo racially disparate impacts, displacement, and exclusion in housing (RCW 36.70A.070(2)(f)); and identify areas that may be of higher risk of displacement from market forces that occur with changes in zoning development regulations and capital investments (RCW 36.70A.070(2)(g)); and

**WHEREAS**, the Growth Management Act further requires the City of Sumner Comprehensive Plan establish antidisplacement policies with the consideration given to the preservation of historical and cultural communities as well as investments in low, very low, and extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing (RCW 36.70A.070(2)(h)); and

**WHEREAS**, the City of Sumner Comprehensive Plan Housing Element contains policy pertaining to the adoption of “provisions in the zoning code such as special zones or development standards that protect manufactured home parks over other types of housing developments” (Policy 6.3); and

**WHEREAS**, the City of Sumner Comprehensive Plan Land Use Element contains policy specific to the establishment of Manufactured Park Overlay zone with the purpose of the overlay being “to support the continuation of manufactured homes as the primary use on the property and to help ensure that MFHPs continue to provide affordable housing options for Sumner residents:” and

**WHEREAS**, manufactured home parks offer an affordable housing alternative within the City, particularly for families and seniors over the age of 55; and

**WHEREAS**, restricting the use of existing manufactured home parks to being only used for manufactured home park purposes reduces the potential for displacement of residents and the likelihood that these properties will be redeveloped; and

**WHEREAS**, the policies in the Comprehensive Plan pertaining to restrictions on future land uses of Manufactured Home Parks is consistent with the Growth Management Act.

**NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON, DO ORDAIN AS FOLLOWS:**

**Section 1.** Chapter 18.34 “Manufactured Home Parks” title and the Sumner Municipal Code is hereby amended to read as follows:

New text: double-underlined  
Deleted text: ~~double-strike-through~~

**Chapter 18.34**

**MANUFACTURED HOME PARKS AND OVERLAY ZONE**

Sections:

- 18.34.010 Applicability.
- 18.34.020 Permitted locations.
- 18.34.030 Conditional uses.
- 18.34.040 Submittal requirements.
- 18.34.050 Park development standards.
- 18.34.060 Manufactured home site standards.
- 18.34.070 Nonconforming parks, site.
- 18.34.080 Operation and maintenance of manufactured home parks.
- 18.34.090 Manufactured Home Park Overlay Zone.

**Section 2.** Section, 18.34.010 “Applicability” and the Sumner Municipal Code is hereby amended to read as follows:

**18.34.010 Applicability.**

The development, preservation and operation of manufactured home parks within the city shall be subject to this chapter. For purposes of this chapter, a “new manufactured home parks” are those parks permitted by the City pursuant to this Title after November 1, 2025.

*NOTE: The revisions to this chapter differentiate between the “new” manufactured home parks (yet to be constructed) and those that are currently existing. This sentence specifies what is meant by a “new manufactured home park” essentially any thing built after this ordinance is enacted, which should be on or near November 1, 2025.*

**Section 3.** Section, 18.34.020 “Permitted Locations” and the Sumner Municipal Code is hereby amended to read as follows:

**18.34.020 Permitted locations.**

The locations for new manufactured home parks shall be governed by the underlying zoning.

**Section 4.** Section, 18.34.030 “Conditional Uses” and the Sumner Municipal Code is hereby amended to read as follows:

**18.34.030 Conditional uses.**

Where new manufactured home parks are required to receive conditional use approval, the hearing examiner and city council shall be guided by the following criteria in addition to the criteria of SMC 18.48.050 in making a decision:

- A. The park design, including site layout, street configuration, landscaping, and community space, are compatible with the surroundings and the community character goals of the comprehensive plan; and
- B. The park is consistent with the comprehensive plan; and
- C. The park makes adequate provision for sanitary sewers, drainage, water, streets, parks, and schools.

**Section 5.** Section, 18.34.040 “Submittal Requirements” and the Sumner Municipal Code is hereby amended to read as follows:

**18.34.040 Submittal requirements.**

All applications submitted for approval of a new manufactured home park shall consist of a development plan, including:

- A. Name of the person who prepared the plan;
- B. Names of all persons owning and managing the land proposed for the development;
- C. Name and address of the proposed manufactured home park;
- D. Scale of the plan and north arrow;
- E. Boundaries and dimensions of the manufactured home park, and number of acres included;
- F. Vicinity map showing uses on adjacent properties and the relationship of the development to such uses;
- G. Location and dimensions of each space, with each space designated by number or other designation;
- H. Location and dimensions of each existing or proposed building;
- I. Location, width and design standards of streets and pedestrian ways;

- J. Location, size and design details of all utilities serving the site;
- K. Location of each lighting fixture for exterior lighting;
- L. Location of recreational and other common areas;
- M. Location and type of landscaping, fences, walls, and other screening structures;
- N. Location, arrangement, and design of all parking facilities;
- O. Location of fire hydrants;
- P. Enlarged plot plan of a typical space, showing location of foundation base, storage space, parking, setbacks to property lines, utility connections, and other improvements;
- Q. Topography of the park site with contour intervals of not more than two feet, and a drainage plan;
- R. A survey plat of the property, plans of structures to be constructed, public water system and sewage approved by appropriate governmental agencies, and garbage disposal provisions;
- S. Any additional information relevant to determining if the proposal meets the applicable approval criteria.

**Section 6.** Section, 18.34.050 “Park Development Standards” and the Sumner Municipal Code is hereby amended to read as follows:

**18.34.050 Park development standards.**

The following standards apply to all new manufactured home parks.

- A. Size. A manufactured home park shall be the same as a planned residential development.
- B. Minimum Right-of-Way. A manufactured home park shall front an improved collector or arterial street.
- C. Density. Spaces within manufactured home parks, regardless of the underlying zoning, shall be a minimum of 4,800 square feet. The minimum space width within manufactured home parks shall be 60 feet. Up to 50 percent of the lots within a park may be no less than 50 feet wide.
- D. Buffers. A manufactured home park shall provide and maintain a minimum landscaped buffer of 20 feet along any property line abutting upon a public street or highway and at least a 10-foot landscaped buffer from any other boundary line defining the outside limits of the park. A maximum of half of the required buffer may coincide with the required setback for a space(s) within the park.
- E. Street Lighting. Street lighting shall be provided according to city standard.

F. Underground Utilities. All utilities shall be installed underground.

G. Swimming Pools. Community swimming pools shall meet the standards of the Tacoma-Pierce County health department and the building code.

H. Signs. Signs identifying the manufactured home park shall conform to applicable sign ordinances.

I. Streets. Within manufactured home parks all streets shall be constructed to city of Sumner standards for public streets, including width, sidewalks, paving depth and base, curve radii and curbs; except that sidewalks may be a minimum of four feet wide. The width of right-of-way required of public streets and planting strips are not required to be provided. The responsibility for maintenance of private roads shall be with the park management. The vehicular speed limit shall be 10 miles per hour and shall be posted to the satisfaction of the police department.

J. Fire Hydrants. Fire hydrants as required by chapter 15.28 SMC shall be provided.

K. Recreational Vehicle Storage. Common storage areas for recreational vehicles, boats or trailers shall be provided as part of the manufactured home park design at the rate of 50 square feet for each site in the park. A six-foot-high sight-obscuring fence with a lockable gate shall be erected around the perimeter of such storage areas. Parking of recreational vehicles shall not be allowed other than in approved storage areas.

L. Playgrounds. Mitigation of parks and open space impacts shall be addressed through on-site provision of parks facilities and open space or through the payment of fees in lieu of such facilities and open space.

**Section 7.** Section, 18.34.060 “Manufactured Home Site Standards” and the Sumner Municipal Code is hereby amended to read as follows:

**18.34.060      Manufactured home site standards.**

The following standards shall be satisfied for new manufactured home sites within manufactured home parks.

A. One Home Per Site. No greater than one manufactured home shall be allowed on a manufactured home site.

B. Internal Setbacks. A manufactured home or attached accessory building shall not be located closer than 10 feet from any other manufactured home or attached accessory building; closer than 10 feet from any roadway lot line or five feet from any other manufactured home site line. Manufactured home accessory structures, when not attached to the manufactured home, shall not be closer than six feet from such home and shall not be closer than five feet to a manufactured home site line and 10 feet to a roadway lot line. Detached accessory structures, when less than 120 square feet may disregard setbacks from manufactured home site lines provided the structure is separated from the manufactured home and all other structures by six feet. No structures are allowed in park buffers.

C. Lot Coverage. A manufactured home and all accessory structures shall not cover more than 50 percent of the area of a manufactured home site.

D. Trailers and Recreational Vehicles. No travel trailer or recreational vehicle shall be utilized except as temporary living quarters and accessory to an existing manufactured home, which use shall not exceed a maximum of 30 days per year. No trailer or recreational vehicle shall be stored on a manufactured home site, except designated storage areas, for more than five days per year.

E. Location of Parking. No required parking of motor vehicles shall be allowed within the 10 feet from the site line abutting a street or vehicular way.

F. Height. Structures within manufactured home parks shall be no greater than one story in height.

**Section 8. New Section.** A new section, 18.34.090 “Manufactured Home Park Overlay Zone” is hereby added to the Sumner Municipal Code to read as follows:

**18.34.090 Manufactured Home Park Overlay Zone.**

A. The Manufactured Home Park (MHP) Overlay Zone is intended to promote the retention of manufactured home parks as a source of affordable detached single-family and senior housing. This classification is assigned to certain existing manufactured home parks which contain leased home sites, as opposed to fee simple owned lots, and as such are more susceptible to future redevelopment. The Manufactured Home Park Zone Overlay shall apply to Medium Density and High Density Residential zones and limits development to manufactured home parks unless an exception is granted per subsection C of this section, or until a comprehensive plan and zoning amendment for another type of land use is requested, considered and adopted.

B. The following existing manufactured home parks inclusive of all associated parcels, shall be designated on the official Zoning Map per SMC 18.06.020 as Manufactured Home Park Overlay Zones:

1. Crystal Springs Mobile Home Park ;
2. Double A Mobile Manor
3. Summerville Estates

C. Use Exception: A manufactured home park owner may request a use exception from the application of the MHP Overlay Zone to their property following the procedures for a Type VI.a land use decision established in chapter 18.56 SMC. ~~The City Council hearing examiner~~ may approve a use exception if the property owner demonstrates that

~~1. the MHP Overlay Zone prevents reasonable beneficial use of the subject property; or~~

~~2. the uses authorized by the MHP Overlay Zone are not economically viable.~~

*NOTE: This amendment removes the reference to a “economically viable” study and determination and leaves it as making a case that there is no “beneficial use” of the subject property. “Beneficial use” is the standard used by the courts to determine whether or not a zoning regulation takes private property without compensation in violation of the 5<sup>th</sup> Amendment of the US Constitution. It is a rather high bar and would typically require that the property owner show that there is little to no economic use available under the current zoning restrictions. This legal review is also why it is necessary for the use exception to be reviewed by a Hearing Examiner, typically a land use attorney, rather than the City Council. (see below)*

If the request is approved by the ~~City Council~~ hearing examiner, then the property shall revert to its previous zoning designation without further action by the ~~City Council~~ hearing examiner. Subsection D of this section sets forth additional requirements for the owner regarding relocation assistance.

*NOTE: These amendments are a correction following review of the Zoning Code regarding the Type VI.a decision. It is a Hearing Examiner decision appealable to the court. This is not a City Council decision.*

D. The owner shall submit to the director a relocation plan that provide for the mobile home park owner assisting each mobile home park tenant household to relocate, in addition to making any state or federal required relocation payments. To the satisfaction of the director, the relocation plan must include ~~detailing, at a minimum, the~~ following:

1. Description of how the mobile/manufactured home park owner intends to comply with RCW 59.20 and 59.21 and other pertinent laws (City, County, of State),
2. An explanation of tenant rights according to State law,
3. A list of sources of assistance (governmental, financial, etc.),
4. A list of available vacant spaces within the mobile/manufactured home park, a list of ~~nearby~~ parks with available spaces within Pierce, King, Kitsap, and Thurston Counties, ~~and~~
5. A list of companies that move manufactured or mobile homes,
6. A list of alternative public and private subsidized housing resources,

7. A list of actions the mobile/manufactured home park owner will take to assist park tenants to move the mobile/manufactured homes from the park, and

8. A description of other actions the owner will take to minimize hardship to mobile home park tenant households suffer as a result of the closure or conversion of the park.

The relocation plan shall be reviewed and approved by the director.

E. Residents within a manufactured home subdivision or park may request a change in zoning to the director that would establish a MHP Overlay Zone designation if there is a potential sale or change that would lead to the displacement of residents. The request for change in zoning shall follow procedures and criteria as set forth in SMC 18.52.

*NOTE: These changes add greater detail regarding the relocation plan and assistance to tenants. The changes also require the relocation plan to be approved by the director.*

**Section 9. Severability.** If a section, subsection, paragraph, sentence, clause, or phrase of this ordinance is declared unconstitutional or invalid for any reason by any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. If the provisions of this ordinance are found to be inconsistent with other provisions of the Sumner Municipal Code, this ordinance is deemed to control.

**Section 10. Effective date.** This ordinance shall take effect five (5) days from the date of publication in the City’s official newspaper.

**Section 11. Corrections by City Clerk or Code Reviser.** Upon approval of the city attorney, the city clerk and the code reviser are authorized to make necessary corrections to this ordinance, including the correction of clerical errors; ordinance, section, or subsection numbering; or references to other local, state, or federal laws, codes, rules, or regulations.

Passed by the City Council and approved by the Mayor of the City of Sumner, Washington, at a regular meeting thereof this \_\_\_\_ day of \_\_\_\_\_

\_\_\_\_\_  
Mayor Kathy Hayden

**ATTEST:**

**APPROVED AS TO FORM:**

\_\_\_\_\_  
City Clerk Michelle Converse, CMC

\_\_\_\_\_  
Andrea Marquez, City Attorney

***First Reading:***  
***Date Adopted:***  
***Date of Publication:***  
***Effective Date:***



**DATE:** July 10, 2025  
**TO:** Planning Commission  
**FROM:** Chrissanda Walker, Associate Planner  
**CC:** Ryan Windish, Community & Economic Development Director  
**RE:** Public Comments Received Prior to the Close of Public Hearing Comment Period

### **I. BACKGROUND**

A Notice of Public Hearing was published on June 26, 2025 for the upcoming hearing on the Zoning Code Text Amendment Manufactured Home Park Overlay District. The city received several comments prior to the end of the public comment period. This memo is updated to reflect a total of three (3) public comment letters received.

Staff will provide a copy of this updated memo to the Planning Commission and read a summary of the comments received during the hearing.

### **III. SUMMARY OF COMMENTS**

- Comment #1 (Exhibit A) comes from Dawnee McCully, a long-term resident who lives in Summerville Estates. McCully indicates they are 71 years old and on a fixed income. The comment is in favor of the preservation of manufactured home parks.
- Comment #2 (Exhibit B) comes from Stephen Barnet, the primary owner and manager of AA Mobile Manor, family-owned since 1968. The comment opposes the overlay and argues that given the age and condition of the Double AA Mobile Manor, with its deteriorating infrastructure and high maintenance demands, continued use as a mobile home park is no longer sustainable. Barnet shares that "In my opinion, the City of Sumner would benefit far more by allowing this site to be redeveloped for multifamily or low-income housing, rather than restricting it to a mobile home park designation".
- Comment #3 (Exhibit C) comes from Tony P., a resident at Crystal Springs Mobile Home Park who submitted written comments expressing concerns about the proposed overlay and exemption policies. Primary concern is the exemptions are too vague which may be exploited by landowners to justify redevelopment. The letter proposes amendments to the policy to better protect manufactured home parks, such as addressing relocation hardships and right of first refusal criteria.

### **IV. EXHIBITS**

- A. 20250703 Email comment #1 – McCulley
- B. 20250708 Email Comment #2 – AA Mobile
- C. 20250709 Email comment #3 – Tony P.



**Planning Commission Meeting**

Sign-In below, if you wish to provide public comment during tonight's public hearing:

	Provide your Name: First and Last	Address:	Do you wish to speak at the Public Hearing Y or N?
1	Wade J. Rudolph	15315 49 <sup>th</sup> Ct. E	Y
2	Lenora C Bruce	15227 50 <sup>th</sup> St E	Y
3	Rocannon Toney	Summer, Wa. 98590 15222 50 <sup>th</sup> St E	Y/N
4	Spencer Thomas	15226 50 <sup>th</sup> St E	Y/N
5			
6			
7	* anyone online must use the raise your hand feature		
8	online: Stephen Barnett	AA mobile Man & owner	
9			
10			
11			



## **MEETING MINUTES**

### **CALL TO ORDER**

The meeting was called to order at 6:01 pm by Chair Issacs

### **ROLL CALL**

Commissioners Present: Moody, Issacs, Healy, Malcolm, Locke, Fochtman, Huo  
Excused Absences:

### **APPROVAL OF MINUTES**

1. Planning Commission meeting minutes-June 5, 2025

Moved to approve Moody, Seconded Healy; **passed unanimously**

### **PUBLIC COMMENT** *(The public may provide comments that are not on tonight's agenda)*

**None Appearing**

### **PUBLIC HEARING**

#### **Chair opens the hearing at 6:06 pm**

Ryan Windish, Community and Economic Development Director provided a brief presentation on the proposed zoning code text amendment for the manufactured home park overlay zone.

Commissioner Isaacs asked about overlay exception application process and staff advised about the process.

Commissioner Healy asked about right of first refusal and staff described it.

Staff provided the Commission with an updated memo for the written comments received and read a summary of three (3) comments to the Commissioners into the record.

Chair Issacs opened the floor to the public to submit any oral testimony

1. Name: George Rudolph, Location/address: 15315 49<sup>th</sup> Ct St E Sumner  
 Topic: Displacement assistance  
 Summary of comment:  
 Mr. Rudolph wanted to know about displacement resources and asked about infrastructure break down within the Double A Mobile Park. He expressed worry about the residents and asked what resources there may be for the residents from the City. He was referred to staff for questions.
  
2. Name: Lenora Bruce, Location/address: Double A Mobile Park  
 Topic: Questions  
 Summary of comment:  
 Ms. Bruce had questions and was directed to staff. She was in favor of the overlay and advised she did not want to move.
  
3. Name Roxanne Tomui , Location/address: 15222 50<sup>th</sup> St E Sumner  
 Topic: Populations of Mobile Parks  
 Summary of comment:  
 Ms. Tomui expressed that there are strict rules about the upkeep of the mobile home parks. She advised that the mobile home park was good for populations with limited income.
  
4. Name Spencer Thomas, Location/address: 15226 50<sup>th</sup> St E Sumner  
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 Mr. Thomas expressed that the residents were unsure what to do in the instance of displacement and advised that he enjoys the culture of the park.
  
5. Name: Stephen Barnet, Location/address: 713 Waterway Drive, Northern Palm Beach, FL  
 Topic: State of the Double A Mobile Park  
 Summary of comment:  
 Mr. Barnet advised that the park's infrastructure is dated and the rents are very low. He advised there are issues with water leaks and zoned at low density residential, advises overlay does not make sense to him as it is restrictive.

Staff recommended that the Commission table the topic until the next meeting.

**Chair closed the hearing at 6:35 pm**

## **UNFINISHED BUSINESS**

1. Manufactured Home Parks Overlay -ACTION

Chair opened the discussion with the Commission on the action item Manufactured Home Park overlay zone.

**Discussion ensued.**

Commissioner Huo asked about RCW 59.20.080 (1)(e) regarding relocation assistance and wanted to know if the proposed amendment conflicted with the statute. She advised that there is a similar ordinance in Seattle and Tumwater. She wanted to know about reasonable exceptions to overlay and felt as it is overlay is too vague.

Commissioner Malcolm commented that the overlay was for protecting the residents of the mobile home parks.

## **NEW BUSINESS**

1. None before the Commission

## **CORRESPONDENCE**

None

## **COMMISSION COMMENTS**

Commissioners made comments about mobile home parks for vulnerable populations, and expressed agreement with the public speakers about their concerns. Commissioners expressed that they would want to see the mobile home parks.

## **STAFF COMMENTS**

Staff advised about Music Off Main starting this Friday in Sumner.

## **ADJOURNMENT**

Moved to adjourn Malcolm, Seconded Healy; all in favor; meeting adjourned at 6:44 pm.


*Minutes submitted by: Maria Parisot*

## Chrissanda Walker

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**From:** Dawnee McCulley <dawneephay1@aol.com>  
**Sent:** Thursday, July 3, 2025 2:06 PM  
**To:** Chrissanda Walker  
**Subject:** RE: Manufactured Home Park Overlay

**Follow Up Flag:** Follow up  
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Dear Ms. Walker

I am writing to tell you that I totally support the proposal. I live in Summerville Estates. I am 71 years old and on a fixed income. I have lived at the park for over 15 years. I am constantly worrying that they will sell the park and kick us all out. My mobile home is a 1981 version. Homes that old are not able to be moved. I would be homeless.

I am not sure how commenting works. I cannot come to the City Counsel Meeting. But I want at least one name on record saying it is a good idea.

Sincerely,  
Dawnee McCulley  
15824 55th Street E  
Sumner, WA 98390

## Chrissanda Walker

---

**From:** Steve Barnet <srbarnet61@gmail.com>  
**Sent:** Tuesday, July 8, 2025 12:33 PM  
**To:** Chrissanda Walker  
**Subject:** Manufactured Home Park Overlay Zone

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**⚠ External:** Use caution with links/attachments.

To Chrissanda Walker  
c/o City of Sumner Planning Commission,

This letter is in response to the new Zoning Overlay proposal being put forth upon 3 designated manufactured home parks in Sumner.

My name is Stephen Barnet, I am the primary owner and manager of one of the MHP you have designated for the new zoning proposal, the Double AA Mobile Manor off East Valley HWY. I am only speaking on behalf of our property because each park listed has its own circumstance. This "Trailer Park" has been in the family since its inception in 1968. Fifty-seven years ago the infrastructure (Sewage pipes, Water pipes & Electrical wiring) were inlaid, drainage and cable came later.

I have concerns about the new Overlay Zoning and the effects and use this proposal will have on a 57 year old property.

I am the 2nd generation owner, my parents were the original owners and developers of this parcel, I inherited the park in 1998. I know this park inside and out and I can tell you, it is at the end of it's useful life, as a Trailer Park. My onsite manager, Marty Pettit, can attest to the difficulties and hardship I/we have experienced trying to keep a 57 year old park operational.

I have 42 trailers (spaces) on 5 1/2 acres, no amenities. Most trailers, I'd say 75% of them, were manufactured in the 1980's, some earlier. These trailers are Not Mobile, they cannot roll out of the park. When a trailer is abandoned by its owner I become the owner. I have to hire a contractor to gut the interior of the trailer, refurbish it and then try to sell it. Because of the age of the homes and park issues, I have to keep my rents at a minimum \$480-\$500, respectively.

This 57 year old park has many issues: The sewage pipes are cracking, the electrical and electrical pedestals are corroding and constantly needing replaced, the water pipes break on a regular basis, especially after the ground thaws (I never know when I'm going to get the call about the ground percolating because of a broken waterline, it happens a lot), when I do get the call, the water has been leaking for some time, I have to send out a locate and then dig-up and fix the leak. The City of Sumner has been good to me by compensating me by adjusting my water bill. This park is constantly needing repairs, it is very expensive to maintain.

I understand, the State of Washington is requesting cities do more to accommodate Low income Housing, our family has been doing this, in Sumner, since 1968. This Trailer Park is tired. It sits on 5 1/2 acres and only caters to 42 trailers (50 people).

In my opinion, the City of Sumner could benefit the most from this, particular property, by allowing Multi-family and Low Income housing zoning instead of limiting the zoning to just a MHP.

Please acknowledge receipt of this letter, thank you,

Stephen Barnet, owner Managing Member  
Double AA Mobile Manor, Trailer Park  
[SRBarnet61@gmail.com](mailto:SRBarnet61@gmail.com)  
425-442-0809

## Chrissanda Walker

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**From:** Tony P. <Antony-Politics@outlook.com>  
**Sent:** Wednesday, July 9, 2025 6:34 AM  
**To:** Chrissanda Walker  
**Cc:** Ryan Windish  
**Subject:** MHP comment

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

⚠ External: Use caution with links/attachments.

My name is Tony and I live in Crystal Springs. I know this is long-winded, but I hope this is read in full. Thank you.

I am worried owners will use your exemptions to sell for redevelopment.

"Reasonable use" is way too vague. What is the landlord decides to do things to make the park look untenable to justify such an exemption?

They could take actions that make the park artificially decline, like jacking up the rent to drive people away, or let the park deteriorate by not maintaining it.

It can be very difficult for someone to relocate a mobile home.

With lots our size, do you really think everyone can find a place to move their trailer to? Selling our trailer, if the landlord is forced to buy upon a sale, isn't going to net us enough money to afford rent for more than three or four years, and that could be problematic for anyone of us who is low income, let alone finding apartments that can fit our family size.

Also, even if we do find a place to move to, this ignores the problem of having to pack up all our stuff since it's not like we can leave it in the trailer while things are being moved, either.

I think there should be a requirement that the landlord first offers people of the park right of First Refusal, with the City of Sumner having the right of Second Refusal where the city would own and run the park.

I don't know if I can convince you to not put in those exemptions. If I can't, I suggest five things.

1. Require that the owners fully pay 100% of the cost of moving our trailers, some of which are double-wides, to a suitable place.
2. Require that they pay for moving expenses, including, but not limited to, a moving company to help pay things since not everyone is able-bodied to handle such a task.
3. I want no less than 12 months after notice of sale rounded up to June.  
Don't make people pack in the rainy months of the year.
4. The park tenants get right of first refusal, and the City of Sumner gets right second refusal.
5. The landlord must provide studies in order to qualify for an exemption, and a public hearing is required before an exemption is given.

I had an AI chatbot try to put my proposal into a better language. Here is what I'd want, but it'd have to be touched up by a proper legal expert...

Proposed Amendment Language - Manufactured Home Park Protections

A. Relocation Assistance Requirements

1. Upon approval of a Use Exception pursuant to SMC 18.34.090(C), the manufactured home park owner shall bear the full cost of relocating each resident's manufactured or mobile home to a suitable location. Relocation costs shall include, but are not limited to, transportation, disassembly and reassembly, installation at the new site, utility hookup fees, and all necessary permitting. This requirement shall apply to homes of all sizes, including double-wide and multi-section units.

2. The owner shall further provide financial assistance for move-related services including, but not limited to, professional packing, labor assistance for residents who are elderly, disabled, or unable to pack or move independently, and temporary storage if necessary during relocation.

B. Resident Protection Timeline and Seasonal Safeguards 1. In the event of the sale, transfer, or approval of any redevelopment project involving a manufactured home park, each resident shall be granted a minimum of twelve (12) months to vacate the premises. This twelve-month period shall begin on the latest of the following dates:

- a. The date of execution of a purchase and sale agreement,
- b. Final land use or redevelopment approval by the City, or
- c. Issuance of any related land use or development permit.

2. Residents shall not be required to vacate the premises until a minimum of twelve (12) full months have elapsed from the applicable trigger date, and in no event shall a required move-out occur prior to June 30 of the subsequent calendar year, in order to avoid displacement during inclement seasonal conditions, including winter and early spring months.

**\*\*C. Right of First Refusal\*\***

1. Prior to executing a binding agreement for the sale or conveyance of all or any part of a manufactured home park subject to the MHP Overlay Zone, the owner shall provide the following rights:

a. A right of first refusal shall be granted to a designated association representing the park residents, providing them with no fewer than sixty (60) days from the date of written notice to exercise the option to purchase the property on the same terms and conditions offered to any third party.

b. If the residents decline or fail to exercise their right within a period of sixty (60) days from the date of the owner's written notice, the City of Sumner shall have a right of second refusal under the same terms and conditions. This right shall be exercisable for a period of thirty (30) days following the date the residents' right of first refusal is formally declined or expires.

**\*\*D. Use Exception Criteria and Procedures\*\*** 1. Any request by a manufactured home park owner for a Use Exception under SMC 18.34.090(C) shall include a comprehensive economic analysis or feasibility study prepared by an independent third-party professional. The study shall demonstrate either:

- a. That the MHP Overlay Zone prohibits any reasonable economic use of the property, or
- b. That continued operation of the park is not economically viable despite good faith efforts.

2. A public hearing shall be held before the City Council prior to any decision on the Use Exception request. The City shall provide written notice to park residents no fewer than thirty (30) days in advance of the hearing, and residents shall be given the opportunity to provide oral or written testimony.

## Chrissanda Walker

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