

Requested by Senator PHAM K

**PROPOSED AMENDMENTS TO
SENATE BILL 684**

1 On page 1 of the printed bill, line 2, after “amending” delete the rest of
2 the line and delete line 3 and insert “ORS 307.092, 456.055, 456.120, 456.153,
3 456.548 and 456.620.”.

4 Delete lines 5 through 29 and delete page 2 and insert:

5 **“SECTION 1. Sections 2 to 4 of this 2025 Act are added to and made**
6 **a part of ORS 456.548 to 456.725.**

7 **“SECTION 2. (1) As used in this section, ‘mixed income housing’**
8 **means multifamily housing in which all of the units are subject to an**
9 **affordable housing covenant, as described in ORS 456.270 to 456.295, for**
10 **a term of no less than 30 years, during which at least some of the units**
11 **are made affordable to low income households and all other units**
12 **made affordable to moderate income households, in such proportions**
13 **as determined by rule of the Housing and Community Services De-**
14 **partment.**

15 **“(2) The department shall develop and implement a program to**
16 **provide below-market, short-term loans for:**

17 **“(a) The construction of mixed income housing; and**

18 **“(b) Notwithstanding ORS 456.620 (4), the acquisition of market**
19 **projects to be converted to housing for persons and families of lower**
20 **income within three years of acquisition.**

21 **“(3) The department shall adopt rules for loans provided under this**

1 section that establish:

2 “(a) The method by which interest rates and terms are set.

3 “(b) Eligibility criteria.

4 “(c) The proportion of housing units that must be affordable to
5 tenants whose income is no greater than 80 percent of the area median
6 income.

7 “(d) The means by which a project that receives a loan described in
8 this section may ensure affordability under paragraph (c) of this sub-
9 section for a term of at least 90 years, which may include ownership
10 or an ownership interest by a housing authority.

11 “(4) Any repayments of a loan made under this section must be
12 deposited into the Mixed Income Public Development Loan Fund under
13 section 3 of this 2025 Act.

14 “SECTION 3. (1) The Mixed Income Public Development Loan Fund
15 is established in the State Treasury, separate and distinct from the
16 General Fund. Interest earned by the Mixed Income Public Develop-
17 ment Loan Fund is credited to the fund.

18 “(2) The fund consists of:

19 “(a) Moneys received under section 2 (4) of this 2025 Act;

20 “(b) Moneys appropriated, allocated, deposited or transferred to the
21 fund by the Legislative Assembly;

22 “(c) Authorized bond proceeds; and

23 “(d) Moneys from any other source, including from the federal
24 government, local governments or private grants or gifts.

25 “(3) Moneys in the fund are continuously appropriated to the
26 Housing and Community Services Department to implement section 2
27 of this 2025 Act.

28 “SECTION 4. (1) On or before January 1, 2027, the Housing and
29 Community Services Department shall, by rule, develop and imple-
30 ment lending strategies that can be used to provide permanent long-

1 **term financing for newly acquired or constructed residential housing.**

2 **“(2) On or before September 15, 2026, the Housing and Community**
3 **Services Department shall provide a report to the interim committees**
4 **of the Legislative Assembly related to housing in the manner provided**
5 **in ORS 192.245 on the progress of the rulemaking and recommen-**
6 **dations for funding the mixed income housing program.**

7 **“SECTION 5.** ORS 456.548 is amended to read:

8 “456.548. As used in ORS 456.548 to 456.725, unless the context requires
9 otherwise:

10 “(1) ‘Bonds’ means any bonds, as defined in ORS 286A.001, or any other
11 evidence of indebtedness, issued under ORS 456.515 to 456.725 or issued in
12 anticipation of bonds and payable from the proceeds of bonds issued.

13 “(2) ‘Capital reserve account’ or ‘capital reserve accounts’ means one or
14 more of the special trust accounts that may be established by the Housing
15 and Community Services Department within the Housing Finance Fund.

16 “(3) ‘Consumer housing cooperative’ means a cooperative corporation
17 formed under ORS chapter 62 and whose articles of incorporation provide,
18 in addition to the other requirements of ORS chapter 62, that:

19 “(a) The consumer housing cooperative has been organized exclusively to
20 provide housing facilities for persons and families of lower income and such
21 social, recreational, commercial and communal facilities as may be incidental
22 to such housing facilities.

23 “(b) All income and earnings of the consumer housing cooperative shall
24 be used exclusively for consumer housing cooperative purposes and that no
25 unreasonable part of the net income or net earnings of the cooperative shall
26 inure to the benefit or profit of any private individual, firm, corporation,
27 partnership or association.

28 “(c) The consumer housing cooperative is in no manner controlled or un-
29 der the direction of or acting in the substantial interest of any private in-
30 dividual, firm, corporation, partnership or association seeking to derive

1 profit or gain therefrom or seeking to eliminate or minimize losses in any
2 transaction therewith, except that such limitation shall apply to the members
3 of the cooperative only to the extent provided by rules of the department.

4 “(d) The operations of the consumer housing cooperative may be super-
5 vised by the department and that the consumer housing cooperative shall
6 enter into such agreements with the department as the department may re-
7 quire to provide regulation by the department of the planning, development
8 and management of any housing project undertaken by the cooperative and
9 the disposition of the property and other interests of the cooperative.

10 “(4) ‘Development costs’ means the costs that have been approved by the
11 department as appropriate expenditures and includes, but is not limited to:

12 “(a) Payments for options to purchase property for the proposed housing
13 project site, deposits on contracts of purchase, payments for the purchase of
14 property as approved by the department, legal, organizational and marketing
15 expenses including payment of attorney fees, managerial and clerical staff
16 salaries, office rent and other incidental expenses, payment of fees for pre-
17 liminary feasibility studies, advances for planning, engineering and archi-
18 tectural work;

19 “(b) Expenses for surveys as to need and market analyses; and

20 “(c) Such other expenses incurred by the qualified housing sponsor as the
21 department may deem necessary under ORS 456.548 to 456.725.

22 “(5) ‘Housing development’ means a development that contains housing
23 units for persons or families of lower income and such other incidental ele-
24 ments of residential, commercial, recreational, industrial, communal or edu-
25 cational facilities as the department determines improve the quality of the
26 development as it relates to housing for persons or families of lower income
27 and the financial feasibility of the development.

28 “(6) ‘Housing finance bond declaration’ means a written instrument signed
29 by the Director of the Housing and Community Services Department or the
30 designee of the director and on file with and bearing the certificate of ap-

1 proval of the State Treasurer or the designee of the State Treasurer, and all
2 housing finance bond declarations supplemental to that instrument.

3 “(7) ‘Housing Finance Fund’ means the Housing Finance Fund established
4 in ORS 456.720 (1).

5 “(8) ‘Lending institution’ means any bank, mortgage banking company,
6 trust company, savings bank, credit union, national banking association,
7 federal savings and loan association or federal credit unit maintaining an
8 office in this state, or any insurance company authorized to do business in
9 this state.

10 “(9) ‘Limited dividend housing sponsor’ means a corporation, trust, part-
11 nership, association or other entity, or an individual that is a mortgagor.

12 “(10) ‘Manufactured dwelling park nonprofit cooperative’ has the meaning
13 given that term in ORS 62.803.

14 “(11) ‘Manufactured housing’ means a dwelling unit manufactured off-site
15 having a minimum width of 10 feet and a minimum area of 400 square feet
16 built on a permanent chassis and designed to be used for permanent resi-
17 dential occupancy whether or not on a permanent foundation, and that con-
18 tains permanent eating, cooking, sleeping and sanitary facilities and meets
19 such standards as the department determines, by rule, are reasonable to
20 maintain the quality, safety and durability of the dwelling, the sanitary re-
21 quirements of the communities in which they are located and the security
22 of the loans that the department may finance for the purchase of the
23 dwellings.

24 “(12) ‘Nonprofit housing corporation’ means an organization formed under
25 ORS chapter 65 and whose articles of incorporation provide, in addition to
26 the other requirements of ORS chapter 65, that:

27 “(a) The corporation has been organized exclusively to provide housing
28 facilities for persons and families of lower income and such other social,
29 recreational, commercial and communal facilities as may be incidental to
30 such housing facilities.

1 “(b) All the income and earnings of the corporation shall be used exclu-
2 sively for corporation purposes and that no part of the net income or net
3 earnings of the corporation may inure to the benefit of any private individ-
4 ual, firm, corporation, partnership or association.

5 “(c) The corporation is in no manner controlled or under the direction
6 or acting in the substantial interest of any private individual, firm, part-
7 nership or association seeking to derive profit or gain therefrom or seeking
8 to eliminate or minimize losses in transactions therewith.

9 “(d) The operations of the corporation may be supervised by the depart-
10 ment and that the corporation shall enter into such agreements with the
11 department as the department may require to regulate the planning, devel-
12 opment and management of any housing project undertaken by the corpo-
13 ration and the disposition of the property and other interests of the
14 corporation.

15 “(13) ‘Person of lower income’ or ‘family of lower income’ means:

16 “(a) A person or family residing in this state whose income is not more
17 than 80 percent of area median income, adjusted for family size, as deter-
18 mined by the Housing and Community Services Department based on infor-
19 mation from the United States Department of Housing and Urban
20 Development;

21 “(b) A person or family residing in this state whose income, adjusted for
22 family size, is below the level the Housing and Community Services Depart-
23 ment has determined to be necessary in order to obtain in the open market
24 decent, safe and sanitary housing, including the cost of utilities and taxes,
25 for not more than 25 percent of the gross income of the person or family; or

26 “(c) Any person or family the department determines is appropriate to
27 treat as a person of lower income or a family of lower income incidental to
28 the accomplishment of department programs for persons and families of lower
29 income described in paragraphs (a) and (b) of this subsection.

30 “(14) ‘Project cost’ or ‘costs of the project’ means the sum of all reason-

1 able expenses incurred by a qualified housing sponsor in undertaking and
2 completing a housing project approved by the department. ‘Project costs’ or
3 ‘costs of the project’ include but are not limited to the expenses incurred by
4 a qualified housing sponsor for:

5 “(a) Studies and surveys;

6 “(b) Plans, specifications, architectural and engineering services;

7 “(c) Legal, organizational and other special services;

8 “(d) Financing, acquisition, demolition, construction, equipment and site
9 development of new and rehabilitated housing units;

10 “(e) Movement of existing buildings to new sites; the cost of acquisition,
11 or estimated fair market value, of land and other interests in real estate;

12 “(f) Rehabilitation, reconstruction, repair or remodeling of existing
13 buildings;

14 “(g) Estimated carrying charges during construction and for a reasonable
15 period thereafter;

16 “(h) Placement of tenants or occupants and relocation services in con-
17 nection with the housing project;

18 “(i) Reasonable builder’s or sponsor’s profit and risk allowance; and

19 “(j) Development costs not otherwise included in this subsection.

20 “(15) ‘Qualified housing sponsor’ means the following entities if approved
21 by the department under ORS 456.620 (2):

22 “(a) A consumer housing cooperative;

23 “(b) A limited dividend housing sponsor;

24 “(c) A nonprofit housing corporation;

25 “(d) A for-profit housing sponsor;

26 “(e) A housing authority;

27 “(f) An urban renewal agency created by ORS 457.035; and

28 “(g) Any city or county governing body or agency or department desig-
29 nated by the governing body.

30 “(16)(a) ‘Residential housing’ means a specific work or improvement

1 within this state **that contains units for persons or families of lower**
2 **incomes and is** undertaken primarily to provide dwelling accommodations,
3 including land development and acquisition, construction or rehabilitation
4 of buildings and improvements thereto, for residential housing, and such
5 other nonhousing facilities as may be incidental or appurtenant thereto and
6 as the department determines improve the quality of the development as it
7 relates to housing for persons or families of lower income **or moderate in-**
8 **come households as defined in ORS 456.270** and the financial feasibility
9 of the development.

10 “(b) ‘Residential housing’ includes, but is not limited to, a specific work
11 or improvement within this state undertaken to provide mobile home or
12 manufactured dwelling parks as defined in ORS 446.003.

13 “(c) As used in this subsection, ‘land development’ includes, but is not
14 limited to, the improvement of streets and alleys and the construction of
15 surface drains, sewers, curbing and sidewalks.

16 “(17) ‘Residential loan’ means any of the following:

17 “(a) A loan that is for the acquisition, construction, improvement or re-
18 habilitation of residential housing and, if the loan is for acquisition or con-
19 struction of residential housing, that is secured by a first lien on real
20 property located in the state and:

21 “(A) Improved by a newly constructed, existing or rehabilitated residen-
22 tial structure for persons or families of lower income; or

23 “(B) Unimproved if the proceeds of such loan shall be used for the
24 erection of a residential structure thereon, whether or not such loan is in-
25 sured or guaranteed by the United States or any instrumentality or agency
26 thereof.

27 “(b) An insured or guaranteed loan for the acquisition of manufactured
28 housing or for the acquisition of a lot described in ORS 92.840 by a manu-
29 factured dwelling park tenant.

30 “(c) A loan for the purchase of a proprietary lease and related cooperative

1 shares in a housing cooperative formed under ORS chapter 62 secured by a
2 security interest of first priority and a pledge or an assignment of proprie-
3 tary leases and related cooperative shares.

4 “(d) A loan, secured by such lien as may be approved by the department,
5 made for the acquisition of a residential structure and made solely to provide
6 down payment or closing cost assistance to allow low and moderate income
7 households to qualify for a first position purchase loan on the structure.

8 **“SECTION 6.** ORS 456.055 is amended to read:

9 “456.055. As used in the Housing Authorities Law, unless the context re-
10 quires otherwise:

11 “(1) ‘Affordable housing’ means dwelling units that may be purchased or
12 rented, with or without government assistance, by persons of eligible income.

13 “(2) ‘Blighted area’ means any area where housing, by reason of neglect
14 and dilapidation, is detrimental to the safety or health of the occupants or
15 of the neighborhood in which the housing is located.

16 “(3) ‘Bonds’ means any bonds, notes, interim certificates, debentures or
17 other obligations issued by an authority pursuant to the Housing Authorities
18 Law. The giving of a note secured by a mortgage or trust deed will not
19 constitute a bond.

20 “(4) ‘The City’ means the particular city included within a particular
21 housing authority.

22 “(5) ‘Clerk’ means the recorder of the city or the clerk of the county, as
23 the case may be, or the officer of the city or the county, respectively, charged
24 with the duties customarily imposed on such clerk.

25 “(6) ‘County’ means any county in the state. ‘The county’ means a par-
26 ticular county or counties for which a particular housing authority is cre-
27 ated.

28 “(7) ‘Governing body’ means, in the case of a city, the common council
29 or other legislative body thereof, and, in the case of a county, the county
30 court, commission or other legislative body thereof.

1 “(8) ‘Housing’ means housing of all kinds, including but not limited to
2 single-family dwellings, multifamily dwellings, emergency shelters, dwelling
3 accommodations, living accommodations, manufactured dwelling parks, resi-
4 dential units, housing projects or other dwellings.

5 “(9) ‘Housing unit’ or ‘unit’ means a single-family dwelling, a single
6 apartment or other single dwelling.

7 “(10) ‘Mixed income housing’ means a housing project that houses tenants
8 with a mixture of income levels, including those not of lower income, for the
9 *[purpose of]* **purposes of:**

10 “(a) Reducing the rents for tenants whose incomes are no greater than
11 ~~[60]~~ **80** percent of the area median income[.]; **and**

12 “(b) **Meeting the housing needs of tenants.**

13 “(11) ‘Obligee of the authority’ or ‘obligee’ includes any bondholder or
14 trustee for any bondholder, or lessor demising to the authority property used
15 in connection with a housing project, or any assignee of such lessor’s inter-
16 est or any part thereof, and the federal government when it is a party to any
17 contract with the authority.

18 “(12) ‘Persons of eligible income’ means individuals or families who meet
19 the applicable income limits of local, state or federally funded programs or
20 developments.

21 “(13) ‘Private market’ means those rental housing units owned and oper-
22 ated by nongovernment entities and without government subsidies.

23 “(14) ‘Person of lower income’ or ‘family of lower income’ means a person
24 or a family, residing in this state, whose income is not greater than 80 per-
25 cent of the area median income, adjusted for family size, as determined by
26 the Housing and Community Services Department using United States De-
27 partment of Housing and Urban Development information.

28 “(15) ‘Real property’ includes all lands, including improvements and fix-
29 tures thereon, and property of any nature appurtenant thereto, or used in
30 connection therewith, and every estate, interest and right, legal or equitable,

1 therein, including terms for years and liens by way of judgment, mortgage
2 or otherwise and the indebtedness secured by such liens.

3 **SECTION 7.** ORS 456.120 is amended to read:

4 “456.120. A housing authority shall constitute a public body corporate and
5 politic, exercising public and essential governmental functions, and having
6 all the powers necessary or convenient to carry out and effectuate the pur-
7 poses of the Housing Authorities Law. These powers shall be vested in the
8 commissioners of the authority and shall include the following in addition
9 to others granted in the Housing Authorities Law:

10 “(1) To sue and be sued.

11 “(2) To have a seal and to alter the same at pleasure.

12 “(3) To have perpetual succession.

13 “(4) To make and execute contracts and other instruments necessary or
14 convenient to the exercise of the powers of the authority.

15 “(5) To make and from time to time amend and repeal bylaws, rules and
16 regulations, not inconsistent with the Housing Authorities Law, to carry
17 into effect the powers and purposes of the authority.

18 “(6) To arrange or contract for the furnishing by any person or agency,
19 public or private, of services, privileges, works or facilities for, or in con-
20 nection with, a housing project or the occupants thereof.

21 “(7) Notwithstanding any laws to the contrary, to include in any contract
22 let in connection with a project, stipulations requiring that the contractor
23 and any subcontractors comply with requirements as to minimum wages and
24 maximum hours of labor, and comply with any conditions which the federal
25 government attaches to its financial aid of the project.

26 “(8) To lease or rent any housing, lands, buildings, structures or facilities
27 embraced in any housing project and, subject to the limitations of the
28 Housing Authorities Law, to establish and revise the rents or charges
29 therefor.

30 “(9) To own, hold and improve real or personal property.

1 “(10) To purchase, buy on contract, exchange, lease, lease back, obtain
2 options upon, acquire by gift, grant, bequest, devise or otherwise any real
3 or personal property or any interest therein and to give its mortgage or trust
4 deed covering any real property or security agreement covering any personal
5 property or any interest in either.

6 “(11) To sell, mortgage, lease, rent, exchange, transfer, assign, pledge or
7 otherwise dispose of any real or personal property or any interest therein.

8 “(12) To insure or provide for the insurance of any real or personal
9 property or operations of the authority against any risks or hazards.

10 “(13) To procure insurance or guarantees from the federal government of
11 the payment of any debts or parts thereof, whether or not incurred by said
12 authority, secured by mortgages on any property included in any of its
13 housing projects.

14 “(14) To invest any funds held in reserves or sinking funds, or any funds
15 not required for immediate disbursement, in property or any investment in
16 which an Oregon city may legally invest surplus funds, and, in addition, to
17 invest bond proceeds and amounts held in bond payment, reserve and pro-
18 ceeds accounts in investment agreements that:

19 “(a) Produce a guaranteed rate of return;

20 “(b) Are fully collateralized by direct obligations of, or obligations guar-
21 anteed by, the United States; and

22 “(c) Require that the collateral be held by the authority, an agent of the
23 authority or a third-party safekeeping agent.

24 “(15) To purchase its bonds at a price not more than the principal amount
25 thereof and accrued interest, all bonds so purchased to be canceled.

26 “(16) To exercise all or any part or combination of powers granted in the
27 Housing Authorities Law.

28 “(17) To borrow money pursuant to ORS 456.055 to 456.235 or as otherwise
29 allowed and accept advances, loans or grants or any other form of financial
30 assistance or any combination of these forms of assistance from the federal

1 government, state, county or other public body, or from any sources, public
2 or private, for the purpose of undertaking and carrying out housing projects.

3 “(18) To enter in a partnership agreement with or loan money to an in-
4 dividual, partnership, corporation or other association to finance, plan,
5 undertake, construct, acquire, manage or operate a housing project.

6 “(19) To finance, develop, own, operate or manage a mixed income housing
7 project. *[that meets the following requirements:]*

8 “[*a*] No fewer than 20 percent of the units in the project so financed shall
9 be rented to households with incomes of 50 percent or less of area median in-
10 come;]

11 “[*b*] No fewer than 40 percent of the units in the project so financed shall
12 be rented to households with incomes of 60 percent or less of area median in-
13 come; or]

14 “[*c*] The minimum requirements imposed by any federal tax law that is
15 applicable to the project.]

16 “(20) To form, finance and have a nonstock interest in, and to manage or
17 operate, partnerships, nonprofit corporations and limited liability companies
18 in order to further the purposes of the housing authority.

19 **“SECTION 8.** ORS 456.153 is amended to read:

20 “456.153. A housing authority may finance, develop, own, manage or op-
21 erate [*a*] mixed income housing [*project if:*]

22 “[*(1)* The housing authority] **if the authority** determines that a substan-
23 tial number of persons of eligible income in the area served by the authority
24 cannot obtain housing for 30 percent or less of their income.

25 “[*(2)* Based on the determination under subsection (1) of this section, the
26 housing authority adopts a resolution declaring the need for additional hous-
27 ing for persons or families of lower income that can be addressed by the au-
28 thority financing, developing, owning, managing or operating a mixed income
29 housing project.]

30 **“SECTION 9.** ORS 307.092 is amended to read:

1 “307.092. (1) As used in this section, ‘property of a housing authority’ in-
2 cludes, but is not limited to:

3 “(a) Property that is held under lease or lease purchase agreement by the
4 housing authority; and

5 “(b) Property of a partnership, nonprofit corporation or limited liability
6 company for which the housing authority is a general partner, limited part-
7 ner, director, member, manager or general manager, if the property is:

8 “(A) Leased or rented to persons of lower income for housing
9 purposes[.]; **or**

10 “(B) **Mixed income housing, as defined in ORS 456.055.**

11 “(2)(a) The property of a housing authority is declared to be public prop-
12 erty used for essential public and governmental purposes and, upon compli-
13 ance with ORS 307.162, the property and the housing authority are exempt
14 from all taxes and special assessments of the city, the county, the state or
15 any political subdivision of the city, county or state.

16 “(b) In lieu of taxes or special assessments, the authority may agree to
17 make payments to the city, county or political subdivision for improvements,
18 services and facilities furnished by the city, county or political subdivision
19 for the benefit of a housing project, but in no event may the payments exceed
20 the estimated cost to the city, county or political subdivision of the im-
21 provements, services or facilities furnished.

22 “(3) Notwithstanding subsection (2) of this section, property of a housing
23 authority that is commercial property leased to a taxable entity is not ex-
24 empt from taxation and special assessments under this section.

25 “**SECTION 10.** ORS 456.620 is amended to read:

26 “456.620. In carrying out housing programs, the Housing and Community
27 Services Department shall:

28 “(1) With the approval of the Oregon Housing Stability Council, adopt
29 standards for the planning, development and management of housing projects
30 for which qualified housing sponsors receive all or a portion of any required

1 financing under ORS 456.548 to 456.725, for audits and inspections to deter-
2 mine compliance with such standards and adopt criteria for the approval of
3 qualified housing sponsors under ORS 456.548 to 456.725.

4 “(2) Adopt criteria by which the department may approve or disqualify
5 qualified housing sponsors.

6 “(3) Enter into agreements with qualified housing sponsors to regulate the
7 planning, development and management of housing projects constructed with
8 the assistance of the department under ORS 456.548 to 456.725.

9 “(4) With the approval of the council, establish maximum household in-
10 come limits for all or a portion of the units in housing projects, including
11 housing developments or other residential housing, financed in whole or in
12 part by the department. The department may finance only the portion of
13 housing projects consisting of units rented to households with an income
14 below 120 percent of the area median income, as defined in ORS 458.610. The
15 department shall, by rule, adopt a methodology for allocating the affordable
16 housing portion of a housing project’s shared costs, including infrastructure
17 and parking. For a housing project financed by the department, the council
18 may establish a minimum ratio or number of units that will be rented to
19 households with an income below 120 percent of the area median income. If
20 the income level in any unit exceeds 120 percent of the area median income,
21 the department shall, to the extent practicable, require that the project, de-
22 velopment or other housing financed by the department have a percentage
23 of low income units that is higher than the minimum percentages established
24 [*in ORS 456.120 (19) for projects financed by local housing authorities or in-*
25 *come limitations that are lower than the limits described in ORS 456.120 (19)*
26 *or a combination thereof*] **by rule**. Income limits for department programs
27 administered on a statewide basis may be established by reference to the area
28 median income. This subsection does not restrict the acquisition of manu-
29 factured dwelling parks.

30 “(5) With the approval of the council, ensure that financing is provided

1 in the department's programs for manufactured housing and for the purchase
2 of lots described in ORS 92.840 by manufactured dwelling park tenants.”

3
