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# PAS MEMO

## Preserving Manufactured Home Communities

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Steam curls up from your coffee mug as you contemplate your use table. *Is a Use Review required to establish a cold storage locker in the Downtown-5 District?*

Your supervisor arrives at your door in an animated state. "Do you have a minute?"

The previous night, she explains, residents of one of the mobile home parks in your municipality filled council chambers beyond capacity. For a full hour and a half, one after another spoke at public comment, pleading for help. The owner of their community wants to redevelop it into luxury townhomes. It made the front page of the paper. Council has asked staff to explore it.

You are to be the lead on this project.

This scenario and others like it are happening in communities across America as a variety of factors increasingly threaten the continuance of manufactured home communities (MHCs), or mobile home parks as they are more commonly called (Figure 1). Does your community have a plan around its MHCs? Or will you be starting from zero when a threat to a MHC in your community arises?



Figure 1. Manufactured housing communities are an affordable home ownership option increasingly threatened in many jurisdictions. Photo by Flickr user [ddatch](#) (CC BY-NC-SA 2.0).

The City of Boulder, Colorado, has been responding with policy to the various threats to MHCs in the community for nearly three and a half decades. This *PAS Memo* provides an overview of mobile and manufactured housing, including the value it offers residents and the broader community and the risks it is subject to, and it examines the various solutions that have been pursued in Boulder and elsewhere.

### A Brief History of Manufactured Home Communities in America

The history of factory-built, towable housing is useful for understanding the vulnerability of today's MHCs. In the 1920s, as automobiles and highways became more widely available, travel trailers emerged for recreation. The Depression Era saw the first travel trailer settlements, occupied by itinerant laborers. Over time, these communities gained permanence.

Public concerns over these early "trailer parks" led municipalities across the country to pass exclusionary zoning and ordinances either disallowing permanent dwelling in camp trailers or restricting them to the least desirable locations within a given community in nonresidential districts (Sullivan 2018).

During World War II, however, the federal government promoted the use of travel trailers by war workers. And as the war ended, GIs returned to a nation in a housing shortage. Policymakers, would-be homeowners, and travel trailer manufacturers at this time all treated mobile homes as a legitimate alternative to site-built housing. As a result of this demand, regulations were loosened to enable wider and more livable—and less easily towable—homes (APA 1950). While MHCs in the 1950s and 1960s increasingly included amenities such as paved streets, laundry, and underground electrical lines, some were far more substandard, as described in a [1956 PAS Report](#): "This overcrowded camp is unlandscaped, a sea of mud in the spring and fall, and has no play space for children" (APA 1956).

In the mid-1950s the median income of mobile home owners was documented as being somewhat higher than the median for the nation (APA 1956), and mainstream acceptance for this housing option appears to have continued. Under Richard Nixon,

## A Note on Terminology: Mobile, Manufactured, or Modular?

The terms *mobile*, *manufactured*, and *modular* are commonly used interchangeably. However, each refers to a different housing type (Figure 2).

*Mobile home* is the term that applies to factory-built housing fabricated prior to June 15, 1976. Most, but not all, adheres to American National Standards Institute (ANSI) standards.

*Manufactured housing* refers to factory-built units constructed on or after June 15, 1976, and subject to safety and construction standards established by the U.S. Department of Housing and Urban Development (HUD).

*Modular homes* are constructed to the same state, local, or regional building codes as site-built homes. Unlike mobile and manufactured homes, which sit on chassis, modular homes are built on permanent foundations.

All three are discussed in this *Memo*.



Figure 2. Mobile (top), manufactured (middle), and modular (bottom) housing. Photo at top by Flickr user BEV Norton (CC BY-NC-ND 2.0). Middle and bottom photos courtesy City of Boulder.



mobile homes were first included in the count of the nation's housing stock and in 1976, formerly "mobile" homes became known as "manufactured homes" subject to the U.S. Department of Housing and Urban Development's construction safety standards. The 1980s brought an uptick of manufactured home sales as funding for the nation's affordable housing programs was simultaneously reduced and privatized (Sullivan 2018).

The high point for sales of manufactured homes in the United States was 1973, which saw more than half a million shipments of new manufactured homes (U.S. Census 2019). In 2008, during the Great Recession, annual manufactured home shipments dipped to an all-time low of just 49,800; they have since risen to 94,600 shipments in 2019 (Figure 3). Nationally, manufactured housing represents about four percent of housing in metropolitan statistical areas (Prosperity Now 2018). Nine percent of the nation's manufactured housing is located in central cities and 47 percent in suburbs.

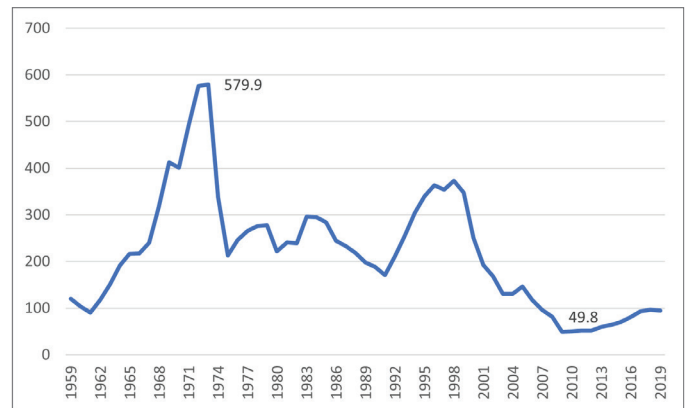


Figure 3. Annual manufactured housing shipments in the United States (in thousands), 1959 to 2019 (U.S. Census Bureau 2019).

### Today's MHCs

Today there are approximately 45,000 MHCs in the United States (U.S. DHS 2018), as shown in Figure 4, p.3).

In a typical MHC, residents own their homes but rent their home sites or pads from the community owner and are subject to land leases. While divided asset ownership is the factor that makes manufactured home ownership significantly less expensive than ownership of other housing, this arrangement results in less housing security for owners of manufactured homes relative to other homeowners. This introduces a dynamic of diverging interests between the manufactured home owner and the land owner. A common source of tension between land owners and home owners is split motives of affordability and profit.

### The Benefits of Manufactured Housing and MHCs

Manufactured housing is often both desirable and beneficial to owners, and upmarket communities are increasingly aware of the value they derive from this relatively affordable housing stock.

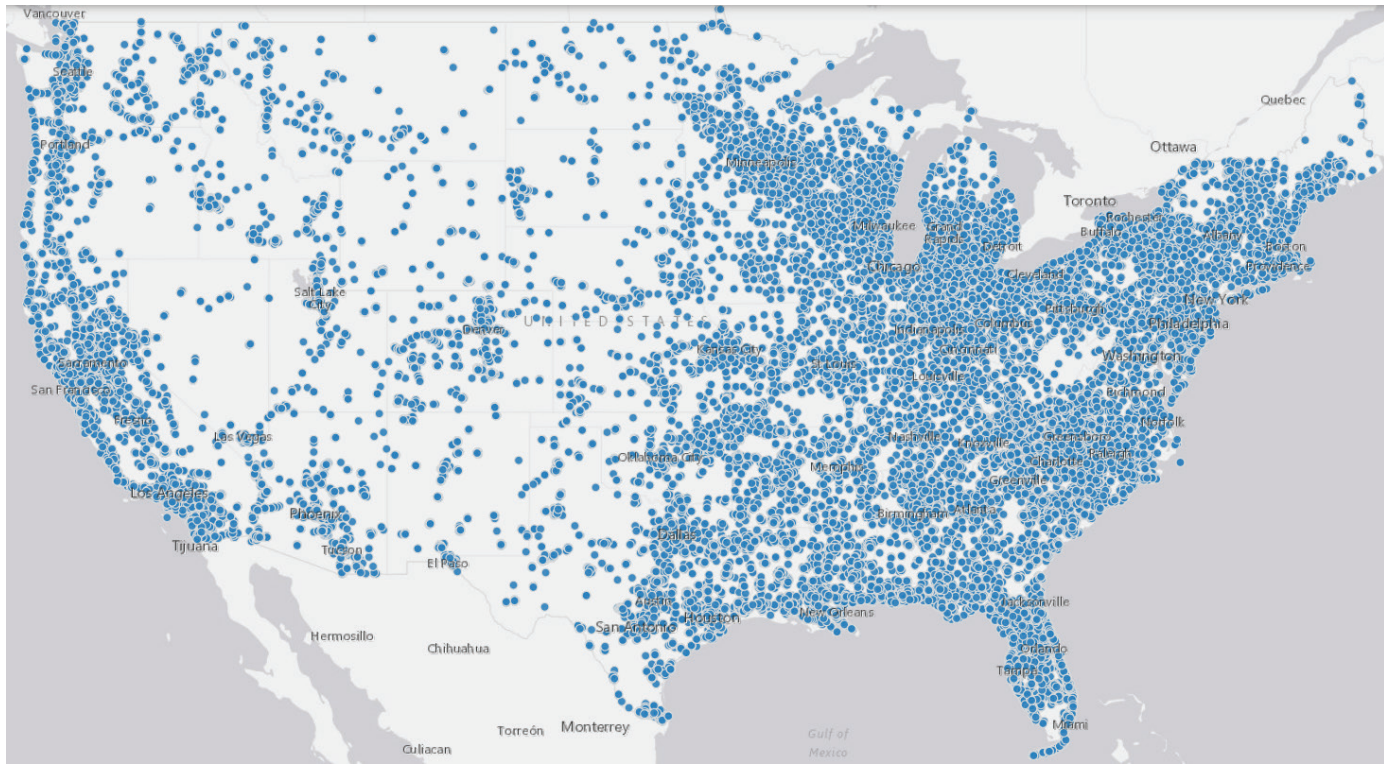


Figure 4. Manufactured home communities in the United States (U.S. DHS 2018).

**Value of housing type to homeowners.** Manufactured home owners value their homes because they are affordable, detached, include some private yard space, and are easier to maintain than a traditional single-family home. The one-story floorplan accommodates mobility challenges and enables aging in place. Residents appreciate the sense of community they experience in MHCs. And, as is the case for owners of site-built housing, manufactured homes are often the single biggest asset of owners.

**Housing ambitions of manufactured home owners.** People become manufactured home owners for a variety of reasons. For some, manufactured home ownership is a step toward owning a traditional stick-built home. Others purchase a manufactured home intending to remain in that community throughout their lives. A third common category of MHC inhabitant is retirees seeking to downsize, reduce maintenance, and live within limited retirement incomes. A final category of manufactured home owner is the individual who purchases a manufactured home as a form of housing of last resort, whether for income, credit history, felony record, documentation status, or other reasons.

**Contribution to communities.** In upmarket communities—such as Boulder, Colorado—MHCs offer some of the only homeownership opportunities available to low-to-moderate income households underserved by the traditional homeownership market. They also can serve as critical sources of housing for a workforce that may not otherwise afford to live near work. And finally, MHCs can be pockets of diversity in upmarket communities (Fluri 2019).

**Challenges to Manufactured Housing and MHCs**

Despite the desirability of manufactured housing for many homeowners and the contribution of this unsubsidized affordable housing stock to communities, a variety of factors threaten MHCs with transformation or loss. Though some new MHCs continue to be established in some regions, anecdotally, loss is the bigger trend.

**Vulnerability to natural disaster.** The Department of Homeland Security describes those living in MHCs as “the most vulnerable residential population to hurricanes, tornadoes, flooding and other natural disasters” (Data.gov 2019). Many of these communities were established as temporary responses to housing shortage conditions in the 1940s and 1950s (APA 1950, 1956). This legacy continued into the 1960s and 1970s, with many MHCs established on the least desirable, often hazard-prone land.

Today, as the cycle of natural disasters becomes more severe and sea levels rise, many of these communities are even more imperiled. A 2013 rain and flood event led to the loss of 273 mobile homes in three Colorado municipalities (Figure 5, p.4); Brown and Simpson 2019). In 1994, after the Category 5 Hurricane Andrew destroyed 730,000 homes and buildings in Florida and Louisiana, HUD established a wind zone system requiring manufactured homes to be constructed to different wind load capacities for different regions of the country (HomeFirst 2015).

**Growth and rising land values.** In upmarket regions, urban growth and increased land values are a growing cause of community closures. Nationally, many MHCs are located in



Figure 5. September 2013 flooding of the St. Vrain Creek in the Confluence MHC in Lyons, Colorado. Photo courtesy C. Chrystal DeCoster, Lyons, CO.

nonresidential zones (Sullivan 2018). Many others are zoned medium density or higher, enabling new high-end housing to replace the existing communities. In a 2016 high-profile redevelopment closure in Aurora, Colorado, 100 households lost their homes to a new transit-oriented development (Long 2018).

**Underinvestment in infrastructure.** Another threat to many older MHCs is chronic underinvestment in infrastructure maintenance and replacement. The infrastructure in many of these communities was installed from the 1950s to the 1970s, and these sewer and water systems are often now at or beyond their anticipated useful life.

Water and sewer leaks in older MHCs with original infrastructure are often routine, which can increase water bills, interrupt water service, and cause sewer backups. Additionally, gas and sewer infrastructure may be shallowly buried, increasing the risk of damage and disruption. Infrastructure failure threatens the long-term viability of these communities.

**Rising pad rents.** MHCs are part of the broader housing spectrum. Nationally, the shortage of affordable housing is a common challenge in upmarket economies. MHCs, as part of the housing spectrum, are seeing pad rent increases as well. Additionally, as “mom and pop” operators retire, the industry is professionalizing with the entrance of investment firms.

This transition has been marked in the Denver metropolitan area, where investor-owned firms have purchased local MHCs and increased rents. Monthly pad rents in the Boulder area were in the \$500s to low \$600s in 2015, but home owners now pay pad rents over \$800. In most communities, utilities are separate from rent, and many homeowners have monthly loan payments on their manufactured homes. Older homeowners on fixed incomes often struggle the most to respond to these trends. To afford rent increases, some rely on public subsidies

while others take on a roommate. In the worst cases, basic needs go unmet or the household must sell and move out.

**Home replacement challenges.** Several cost factors make it difficult for homeowners to consider replacing their older-model homes with newer, safer, more energy-efficient ones. Homeowners are responsible for hauling away and disposing of—or arranging for on-site deconstruction of—their older homes. Costs are in the thousands to tens of thousands of dollars depending on factors such as asbestos mitigation and home condition. Homeowners often cannot afford to purchase a newer home outright so must secure a chattel loan.

Manufactured homes are treated as chattel or personal property because they are considered movable. Interest rates for chattel loans in MHCs are approximately double those of mortgage loans and have 10- and 15-year loan terms. More than two-thirds of manufactured home loans reported under the Home Mortgage Disclosure Act in 2012 qualified as “higher-priced mortgage loans” (HPML), a category of subprime loan (Consumer Finance Protection Bureau 2014).

In 2016, the Federal Housing Finance Agency issued a [Duty to Serve notification](#) to Fannie Mae and Freddie Mac to better serve the manufactured housing market “by improving the distribution and availability of mortgage financing in a safe and sound manner” (FHFA 2016). Aligned with this intent, in Colorado, somewhat lower interest rates are being offered by Community Development Finance Institution (CDFI) Impact Development Partners.

**Housing safety and quality.** As noted earlier, HUD enacted design and construction safety standards in 1976. These standards introduced flame spread ratings for surfaces near central heat, water heaters, and cooking ranges. Electrical distribution and lighting equipment is another major cause of fire death in these

older homes. Between 2007 and 2011, death rates in post-HUD-standard manufactured homes were 57 percent lower than those for pre-HUD-standard manufactured homes (Hall 2013).

On average, manufactured home owners spend twice as much per square foot on energy costs compared with single-family homeowners (Ungar 2016). While jurisdictions have increased energy efficiency requirements, manufactured homes are still subject to energy efficiency requirements established more than 25 years ago. However, some manufacturers are voluntarily producing ENERGY STAR-rated homes, which can save homeowners between 24 and 29 percent of annual heating and cooling costs (Prosperity Now 2017).

**Management practices.** A final area of challenge in MHCs is management practices. These can include hiring of predatory towing companies, uneven enforcement of regulations, lack of a local manager, neglecting or charging homeowners for maintenance of trees (which can fall and damage homes), and retaliatory actions against residents. Some states are taking action in these areas. The State of Colorado established a [Mobile Home Park Act Dispute Resolution and Enforcement Program](#) in 2019, which commenced full operation in May 2020. A [similar program](#) has seen success in Washington State.

### Manufactured Housing Preservation in Boulder

Boulder's five MHCs are home to around 1,350 manufactured homes, representing 2.9 percent of the community's housing stock. Vacancy in these communities is perennially near zero as they are of some of the last relatively affordable market-rate housing in and near Boulder. Recognizing both the beneficial role of these communities in the broader community and the risk of redevelopment, Boulder was one of the earliest communities in the country to establish preservation zoning for MHCs.

To understand Boulder's commitment to preserve manufactured housing in the community, it is helpful to understand the local context. For decades, Boulder has benefitted from strong local and regional economic sectors, anchor institutions, and significant natural amenities. Yet for over half a century, growth in Boulder has been constrained by land conservation measures such as the Blue Line, a boundary beyond which city water may not extend, and an open space tax to set aside conservation land. The first Boulder Valley Comprehensive Plan was adopted in 1978, directing growth into developed areas such as the City of Boulder while preserving the rural character of unincorporated Boulder County. In such a high-demand, growth-constrained environment, the merits of every land use are scrutinized, and officials recognize MHCs as a market-rate source of affordable homeownership.

The rest of this section offers overviews of policy approaches pursued in Boulder over the past three-and-a-half decades to preserve manufactured housing and MHCs.

**Zoning.** As mentioned above, in 1985, to address redevelopment risk, the city established a Mobile Home (MH) zone for MHCs ([§9-5-2, Boulder Revised Code, 1981](#)). MH zoning is a form of preservation zoning insofar as that it eliminates the possibility of other uses unless city leaders approve a zoning change.

**Land use.** The 2000 major update to the Boulder Valley Comprehensive Plan introduced a Manufactured Housing (MH) land-use designation "signal[ing] the city's intent to preserve affordable housing provided by the existing mobile home parks" (Boulder n.d., "Ponderosa History"). This designation also created consistency between county land-use and zoning maps.

**Comprehensive plan policy.** That same comprehensive plan update also introduced a new manufactured housing policy within the Housing section with the intent to "provide a policy basis for protecting and preserving a uniquely vulnerable type of existing low income housing." The current iteration of that policy reads as follows:

#### *7.08 Preservation and Development of Manufactured Housing*

*Recognizing the importance of manufactured housing as an option for many households, the city and county will encourage the preservation of existing mobile home parks and the development of new manufactured home parks, including increasing opportunities for resident-owned parks. If an existing mobile home park is found to have health or safety issues, every reasonable effort will be made to reduce or eliminate the issues, when feasible, or to help mitigate for the loss of housing through re-housing of affected households.*

**Local regulations.** Local regulation of MHCs is defined in [Chapter 10-12. Mobile Homes \(B.R.C., 1981\)](#). This chapter of the Boulder Revised Code addresses construction, location, installation, use, and maintenance of mobile homes in MHCs. However, in areas where the state Mobile Home Park Act (Colorado Revised Statutes (C.R.S.) [§38-12-200.1 et seq.](#)) is silent, the city passed ordinances in 2015 ([Ordinance No. 8043](#)) and 2017 ([Ordinance No. 8216](#)) introducing new resident protections and means of enforcement. These ordinances address limitations on park owners' and other parties' abilities to prohibit the sale of mobile homes constructed prior to establishment of HUD safety standards, limitations on required upgrades to existing mobile homes, assigning responsibility for tree maintenance to park owners and their agents, residents' right to privacy, the prohibition of retaliation by park owners against mobile home owners, and mandatory dispute mediation ([§10-12-25-30](#)).

**Park purchases.** Though the City of Boulder does not typically own housing, it has, in two instances, purchased MHCs to advance city policies. The first instance was Mapleton Mobile Home Park, purchased in the mid-1990s to address flood safety issues, and the second was the Ponderosa Mobile Home Park, purchased in 2017 to address failing infrastructure.

#### *Mapleton Mobile Home Park*

In 1996, the city purchased Mapleton Mobile Home Park (Figure 6, p.6) with \$3.5 million of its Stormwater and Flood Control Utility Fund, funded by utility charges, to facilitate planned flood improvements to the adjacent Goose Creek,



Figure 6. Mapleton Mobile Home Park. Courtesy City of Boulder.

resident ownership of Mapleton, and permanent affordability.

The lack of financing options for residents to subsequently purchase Mapleton from the city and to implement infrastructure improvements, along with concerns related to park management, led the city and resident nonprofit Mapleton Home Association (MHA) to approach affordable housing nonprofit Thistle Communities to purchase Mapleton.

In 2004, the city sold Mapleton to Thistle for \$2.96 million (with \$550,000 of city subsidy funds), retaining some land along Goose Creek for completion of flood mitigation work. MHA now leases Mapleton from Thistle and contracts with a third-party property management company to oversee management.

Of Mapleton’s 135 lots, 120 are permanently affordable to households earning at or below 30 to 60 percent of the area median income. In 2007, the city provided \$884,000 in subsidy toward an estimated \$4.7 million of infrastructure improvements completed south of Goose Creek. Thistle and MHA were recently awarded Health Equity funds (a sweetened-beverage tax fund) that will cover water infrastructure and are working together to secure funding to support infrastructure improvements in Mapleton north of the creek.

### **Ponderosa Mobile Home Park**

The Ponderosa Mobile Home Park (Figure 7) is a 68-lot community established in the mid-1950s. The community is located adjacent



Figure 7. Ponderosa Mobile Home Park. Courtesy City of Boulder.

to Fourmile Canyon Creek in the 100- and 500-year floodplains. Ponderosa’s nearly 200 residents are primarily homeowners, the largest shares of which are Latino families in the workforce and older, retired non-Latino couples and individuals, some of whom are disabled. Until October 2019, Ponderosa was an unincorporated enclave of Boulder. In the late 1970s well water in the community was contaminated by upstream mining activity, so in the early 1980s Ponderosa was placed on an out-of-city utility permit for water and sewer service.

Infrastructure in the Ponderosa Mobile Home Park is well beyond its useful life. Water leaks spike water bills in the community and sewer backups are common. Roads are unpaved and there are no green spaces and few trees. Sand and gravel from unpaved streets regularly flow onto adjacent parcels.

After a major 2013 flood event in the region, which caused sheet flow flooding from Fourmile Canyon Creek to the north, infrastructure conditions worsened. In early 2014, the owners of Ponderosa approached the city about replacing its water and sewer infrastructure. With the aid of a Community Development Block Grant–Disaster Recovery (CDBG-DR) Resiliency Planning Grant, the city engaged the community owner and homeowners to seek a path forward and performed an infrastructure cost estimate.

The following goals and drivers for Ponderosa were informed by residents, the park owner, city staff, and council members:

- minimize disruption to residents
- minimize resident displacement
- improve resilience
- improve health and safety
- retain affordability
- create certainty for the future
- achieve annexation goals
- encourage long-term investment in property
- improve utility stability, reliability, and service
- leverage disaster recovery funding
- minimize costs, maximize investment

Ultimately, the owner did not pursue infrastructure replacement. In 2017, however, the city was able to negotiate purchase of Ponderosa using \$4.2 million in CDBG-DR funds. The following elements define the [Ponderosa Community Stabilization Program](#):

- Preservation of long-term affordability
- Annexation into the city
- Infrastructure replacement and upgrades
- Flood risk reduction
- Replacement of old mobile homes with energy-efficient, affordable modular fixed-foundation homes (primarily duplexes, with some single families, one triplex, and two fourplexes)
- 99-year renewable land leases
- New common amenities, including additional green spaces, community gardens, and a common house

- Once adequately stabilized, transfer of land to the housing authority or other affordable housing nonprofit

Meeting these goals, however, would be challenging. While all existing homes in Ponderosa meet flood protection elevation requirements, many do not meet adequate fire safety separations. While many are well maintained, others are in very poor condition. It will be challenging for residents in the poorest-condition homes to upgrade to new homes, as standard new manufactured homes are wider and longer than the footprints of most existing homes in Ponderosa and would likely require more expensive custom footprints and still not meet fire safety separations.

Without intervention, over time the number of homes in the community would decline and households with inadequate means and few options to remain in Boulder would likely experience deteriorating safety. If the city were to apply all code standards to Ponderosa through the annexation process and site plan review, however, many existing households would be displaced and fewer homes would be in the community than there are today.

Having identified these challenges, the city sought solutions through flexibility. In [Resolution No. 1217](#), adopted in October 2017, the city committed to minimizing displacement of residents, in part through employing extensive engagement. Flatirons Habitat for Humanity will offer deeply affordable homeownership and rental homes designed with community input. Phase I homes will be stick-built. Later phases are planned to be modular construction, which will advance energy efficiency while reducing construction impacts on the community. The city and Habitat are partnering to establish a modular construction facility.

Using local Affordable Housing Fund dollars, the city plans to fund household subsidies that will ensure homeownership is within reach for this predominantly extremely low income (below 30 percent AMI) community. A phased site plan allows residents to remain in their existing homes indefinitely; a [Memorandum in Lieu of Annexation Agreement](#) enables their continuance, side-by-side with stick-built housing, as a legally nonconforming use. New home construction will be driven by residents' choice and Habitat's capacity to build.

### Action Steps for Planners

Though MHCs and the housing stock within them face complex challenges, they also present benefits to both home owners and the broader community. Planners should be prepared and critically consider what solutions make sense in their communities. The following list highlights a range of actions planners can take to help preserve MHCs.

**Understand your MHCs.** A first step is to establish an inventory of existing MHCs in your community and their potential issues. Assessor's data, census data, a historic review of permits, site visits, community surveys, and conversations with manufactured home owners can provide insight into the nature of local MHCs. Important questions to consider include the following:

- How many MHCs are there?
- How many manufactured homes are in each MHC?
- How many homes were built prior to 1976? How many are newer?
- Are the homes owned by the households that occupy them or by others? If so, who? Are they MHC-owned? Third-party owned?
- Are homes in the community well maintained? Are they appropriately spaced?
- What amenities exist in the community (e.g., clubhouse, laundry, tennis, swimming pool, etc.)? Are they well maintained?
- Are streets and roads well maintained?
- When was infrastructure installed? Has it been replaced? When do the materials reach end of useful life?
- Who lives in the MHCs (e.g., age, income, ethnicity, profession, household size)?

**Engage residents.** Often the best source of information is the residents themselves. Increasingly, cities are developing equitable engagement infrastructure. Equitable engagement varies from traditional engagement in that additional effort is understood to be necessary to bridge long-standing and varied barriers. MHCs often include many households who traditionally have fewer inroads to city resources and may be entirely unfamiliar with government. For example, in Ponderosa many home owners come from other countries and do not speak English; several cannot read or write; some have vision impairment; many do not have access to computers or cell phones; several have mobility challenges; and many work multiple jobs, have younger children, or carry an inherent distrust of government.

Trust must be built authentically through effort commensurate with the undertaking. Participation in a survey may benefit from going door-to-door with a trusted community member, interpretation support, and a monetary award for participation. Planning an intervention such as infrastructure replacement will require numerous community meetings with childcare and interpretation available, one-on-one meetings, and clear communications through media such as newsletters and community texting.

**Develop a displacement plan.** A next step for communities is often development of a plan for the event of MHC closures. For example, Fort Collins, Colorado, created its [Affordable Housing Redevelopment Displacement Mitigation Strategy](#) after several MHC closures in that community. This plan creates a detailed approach to relocation assistance (e.g., financial assistance, organizational partnering) for households while also suggesting policy next steps such as a local requirement that extends the notice period when an MHC will close or sell and creation of a designated MHC zone to discourage redevelopment. Another example comes from Chapel Hill, North Carolina, whose [Manufactured Home Strategy](#) is also heavily focused on relocation solutions when these communities close.

**Establish manufactured housing preservation zoning and add policy language related to the comprehensive**

**plan.** Zoning is one of the most important tools available to local government to prevent the redevelopment of MHCs into another use. If a community is committed to preserving manufactured housing, the first step to signaling this intent is to explore adoption of a manufactured housing preservation zone. Creating an MHC-specific zone disallows other uses where existing communities are located. Comprehensive planning policy provides additional opportunity for a community to articulate its vision for these communities.

In 2007, Snohomish County, Washington, adopted an ordinance establishing a [Mobile Home Park zone](#) to encourage the preservation of MHCs, and in 2009 it passed [two additional manufactured home park ordinances](#) strengthening zoning protections and enabling as many as 2,000 MHC residents to stay in their homes. Portland, Oregon, recently adopted a new [Manufactured Dwelling Park \(MPD\) zone](#) (\$33.251.010–030) to preserve MHCs and corresponding [comprehensive plan amendments](#) that introduce a Manufactured Dwelling Park definition.

Additional guidance on manufactured housing preservation policies is available in a [Manufactured Housing Toolkit](#) by Prosperity Now (n.d.), an organization focused on financial security, stability, and mobility for low-income households.

**If an MHC is at imminent risk of closure, consider an emergency redevelopment moratorium.** If a community is at imminent risk of closure, the local government can adopt a moratorium to buy time to explore or establish policy. Snohomish County adopted an [emergency conversion moratorium and interim zoning ordinance](#) to halt MHC conversions while it worked on its zoning updates. In 2018, the City of Aurora passed a moratorium to temporarily halt redevelopment of mobile home parks while a [task force](#) studied the lack of locally available affordable housing and developed recommendations to address the displacement of mobile home park residents due to closures, rezoning, and redevelopment (Mason 2018). In 2019, the City of Fort Collins passed a [moratorium](#) to provide staff with time to identify resident protections (Marmaduke 2019).

**Develop a manufactured housing strategy.** MHCs are complicated. They can be compromised by the divided asset structure that makes them affordable. In some communities, the housing is unsafe and in poor condition, infrastructure and common amenities suffer from chronic underinvestment, and management practices may be predatory. In others, however, homes are high quality, safe, and energy efficient, and communities are well run.

Development of a strategy specific to this housing type can help catalog challenges, identify solutions, and create the partnerships necessary to implement those solutions. Depending on the challenges in the manufactured home communities in your community, prospective partners could be lenders, housing authorities or other affordable housing partners, a [ROC USA](#) affiliate, community organizers and others who may have preexisting relationships with residents, emergency financial assistance providers, weatherization programs, legal clinics, and so forth. In Boulder, we have found

universities to be valuable partners for legal representation for MHC residents, demographic research, engagement, and programmatic support.

Boulder's [Manufactured Housing Strategy](#) identifies principles for intervention in manufactured home communities and lays out an action plan that addresses items such as infrastructure, utility billing, and rent increases.

**Regulate.** What issues are the MHCs in your community facing? Aggressive or negligent management practices? Infrastructure maintenance issues? Regulatory approaches can range from discrete code provisions to full licensing and enforcement programs, depending on the resources of the community. Here is a short list of common issues in manufactured home communities and potential solutions:

- *Rent increases.* This is the most common concern among MHC residents in the Denver metro area and likely in most upmarket communities. Some areas allow rent control or stabilization, others do not. Local pad rent stabilization requirements may be pursued in states that do not have rent control restrictions; otherwise, state legislative efforts will be necessary.
- *Retaliation.* Retaliation is a common issue reported by residents. Several communities in the Denver metro area have adopted antiretaliation requirements.
- *Communication.* Often non-English-speaking tenants are asked to sign leases they cannot read. Municipalities can require that leases are made available in the second dominant language of the MHC.
- *Rules and regulations.* In addition to complaints about uneven enforcement of rules, which in Colorado is regulated at the state level, we often hear that rules and regulations are changed often and the full set of rules and regulations is not available to view. Requiring posting of rules and regulations in a common area can address this issue.
- *Utility billing issues.* Increasingly, utility costs in MHCs are charged to residents separately from rent. Even in communities where water is sub-metered, residents may still be asked to pay for common area watering. Residents may not know how the utility bill is divided, be concerned about retaliatory billing, and worry that they are paying for infrastructure leaks. Transparency requirements can help address these concerns.
- *Infrastructure failure.* In 2018, one MHC in Boulder had a water outage that lasted off and on for six days. As a result, city staff will be pursuing the following approaches:
  - Identifying a program for local performance standards for MHC infrastructure
  - Requiring MHC owners to compensate residents if utilities were not provided for an extended time period
  - Identifying barriers, such as city standards, to infrastructure replacement and considering leniency
  - Requiring communities to make available to city



- staff infrastructure maps, and maintenance and replacement plans
  - Considering incentives to encourage infrastructure replacement
- *Pre-1976 (pre-HUD standard) homes.* For a variety of reasons ranging from safety data to aesthetics, it is common industry practice to disallow homeowners from selling pre-HUD homes. As noted earlier, a mobile home is likely a homeowner's single largest investment, so this practice can be financially devastating. At the local or state level, prohibitions can be passed on disallowing the sale of these homes. In Boulder this was coupled with an inspection requirement so that the next home owner is on notice of any issues.
- *Tree maintenance.* Trees are a common area of contention in mobile home parks. Regulations can clarify which party is responsible for tree maintenance and the cost thereof.

**Support manufactured home owners.** From mobile home repair programs to assistance navigating city services, there are a variety of ways municipalities can support manufactured home owners.

In Boulder, the city's [mobile home park resources webpage](#) provides links to helpful resources for MHC residents, including MHC-specific neighborhood grant and neighborhood block party opportunities, MHC FAQs, policies, the Manufactured Housing Strategy, the home inspection form, an MHC homeowners handbook, and more.

**Support park owners.** Many of the approaches discussed thus far focus on regulating MHC owners to protect community residents, but it is also important to offer resources to these entities as well. Incentive programs can be helpful, particularly to promote maintenance and replacement of infrastructure. Monetary incentives can facilitate infrastructure replacement, while code flexibility can make reinvestment in these communities more affordable and may be critical to ensuring that infrastructure replacement is possible without the loss of home sites. Infrastructure incentives can also enable jurisdictions to negotiate stabilized rents or other outcomes.

Information on a range of approaches to manufactured housing infrastructure maintenance, along with other MHC preservation strategies, can be found in a [mobile home park infrastructure study](#) prepared for Boulder (Bauer, Sorce, and Sullivan 2016).

## Conclusion

Around the country, manufactured housing communities are increasingly at risk of closure as communities age, up-market communities grow and experience housing shortages, and the nature of community owners transitions from "mom and pop" operators to multinational corporations. These factors put these communities at risk of closure and redevelopment. Long-time manufactured home owners in many up-market regions are also experiencing increasingly unaffordable pad rents.

In the past, local governments often avoided intervention

in MHCs due to complexity of issues in these communities and because the per square foot value of investment in stabilizing these communities compared unfavorably with newly built affordable apartments. As land values and construction costs rise, MHCs are comparing more favorably. Additionally, loss of these communities is increasingly understood to be a social justice and equity problem.

Many tools are now available to preserve and improve these communities. Planners should proactively seek to understand the status of MHCs in the jurisdictions where they work and be prepared to protect and improve this affordable housing option for residents.

## About the Author

Crystal Launder works for the City of Boulder's Department of Housing and Human Services as a housing planner. Her work focuses on housing policy, most recently concentrating on manufactured housing issues. She is the project manager for the Ponderosa Community Stabilization Project, which seeks to stabilize a manufactured home community with failing infrastructure while minimizing displacement. She also helped develop the city's first Manufactured Housing Strategy and is overseeing implementation of its Action Plan. Launder holds an undergraduate degree in sociology and psychology from Middlebury College and a Master of Regional Planning degree from Cornell University.

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