



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

May 5, 2017

Ms. Julie Farnham, Planner
City of Bloomington
1800 West Old Shakopee Road
Bloomington, Minnesota 55431

Dear Ms. Farnham:

All Parks Alliance for Change (APAC) is a homeowners' association that represents the residents of manufactured housing parks across the state of Minnesota and the region. APAC staff and resident leaders are very interested in working with you to improve the wellbeing of Bloomington's manufactured housing residents.

The Great Recession has set the stage for an affordable housing shortage in the Twin Cities metro area. Manufactured housing is an important source of unsubsidized affordable housing that we can no longer afford to ignore. This letter contains recommendations for how Bloomington can utilize manufactured housing to reach its affordable housing goals set by the Metropolitan Council.

Implementing these recommendations will boost your housing performance score, improve the wellbeing and opportunities of your low-income residents, and will enhance your ability to obtain future funding opportunities from Metropolitan Council in accordance with the Livable Communities Act of 2011. In addition to the information about manufactured housing in Bloomington that is provided within this packet, we have provided specific policy recommendations. These include the following suggestions:

1. Use manufactured housing to address affordability without new large-scale multifamily construction;
2. Change ordinances to allow manufactured homes to be sited in residential districts outside existing parks;
3. Improve your City's level of affordable housing by reducing loan barriers to move residents into currently available manufactured housing units;
4. Generate funding opportunities for repair and maintenance, and set standards for infrastructure in manufactured housing parks;
5. Encourage resident purchase of communities through local tax incentives and first refusal rights;
6. Promote manufactured housing within your comprehensive plan and other city outlets as a primary unsubsidized affordable homeownership option for low-income working residents; and
7. Actively reduce stigma against manufactured housing.

The city snapshot, policy recommendations, SWOT analysis, and statewide statistics contained in this packet are guiding documents to assist you in your comprehensive planning process. We invite you to use us as a resource as you update your City's Comprehensive Plan and develop planning strategies around affordable and manufactured housing.

The City of Bloomington has traditionally occupied an important role when it comes to manufactured housing, and the policies that have developed around it. In 1989, Bloomington authorized the State of Minnesota's first park closing ordinance, providing much needed relocation compensation to park residents when they are forced to move. This ordinance was first used during the closure of Collins Park in 1993, when 90 households were given



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

relocation compensation or the fair market value for their homes. The closure ordinance was tested in court for the first time and upheld in 1995. This was an important step towards securing the wellbeing of park residents facing closure across Minnesota and set an important precedent for residents to pursue similar remedies through the Minnesota Manufactured Home Relocation Trust Fund, established as State law in 2007. This policy change has helped reduce the financial and emotional devastation that park residents feel when they lose their community after facing a closure. We hope that the City of Bloomington continues its tradition of favorably upholding the rights and wellbeing of manufactured housing park residents, and offer our services to aid the City on this path.

APAC has a unique 35-year focus on manufactured housing policy, research, and analysis. Our organization occupies a central role in sharing information about this unique form of housing, and can also help you reach park residents to advance your programming and policies. We are very interested in discussing the contents of this packet and will contact you in the near future to set up a meeting. Please do not hesitate to contact us with any questions or concerns.

Sincerely,

Owen Hawkins
Program Associate

Dave Anderson
Executive Director



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Snapshot of Manufactured Housing in Bloomington, Minnesota

Bloomington’s 2018 comprehensive plan update presents many opportunities to improve strategies that preserve and expand affordable housing. Developing innovative methods to reach that goal will boost your City’s housing performance score, allowing Bloomington to obtain funding from the Metropolitan Council through the 2011 Livable Communities Act.

Manufactured housing is affordable housing

The fair market rent for a two bedroom in the Twin Cities Metro Area is \$1,027. **Around Bloomington’s manufactured home parks, the small area fair market rent is as high as \$970, more than double the lot rent of a manufactured home in Bloomington’s Krestwood manufactured housing park.**

Fair Market Rents compared to Manufactured Home Lot Rent in Bloomington

	Efficiency	1 Bedroom	2 Bedroom
Small Area FMR 55420	\$620	\$770	\$970
Twin Cities FMR	\$656	\$813	\$1,027
Manufactured Home Lot Rent in Krestwood Mobile Home Park	-	-	\$430

Source: HUD, 2016¹

The average lot rent for a manufactured home in Bloomington’s Krestwood Mobile Home Park is \$430, or approximately one third of the Fair Market Rent in Bloomington, which confirms the affordability of manufactured housing and positions it as a unique and valuable resource for cities interested in improving the affordable housing they offer residents.

Bloomington Manufactured Housing (2014)

	Krestwood Mobile Home Park	Southgate Mobile Village
Total Lots	57	48
Vacant Lots	3	6
Vacant Homes	3	8
2014 Population	94	132
Average Lot Rent	\$430	Unavailable

Source: APAC 2017²

Why preserve and support manufactured housing in Bloomington?

Approximately 226 people live in manufactured housing in Bloomington, making it an important source of affordable living for the City’s residents. In addition to providing unsubsidized affordable units for residents, manufactured housing helps Bloomington meet its goals of providing lifecycle housing options to transitioning

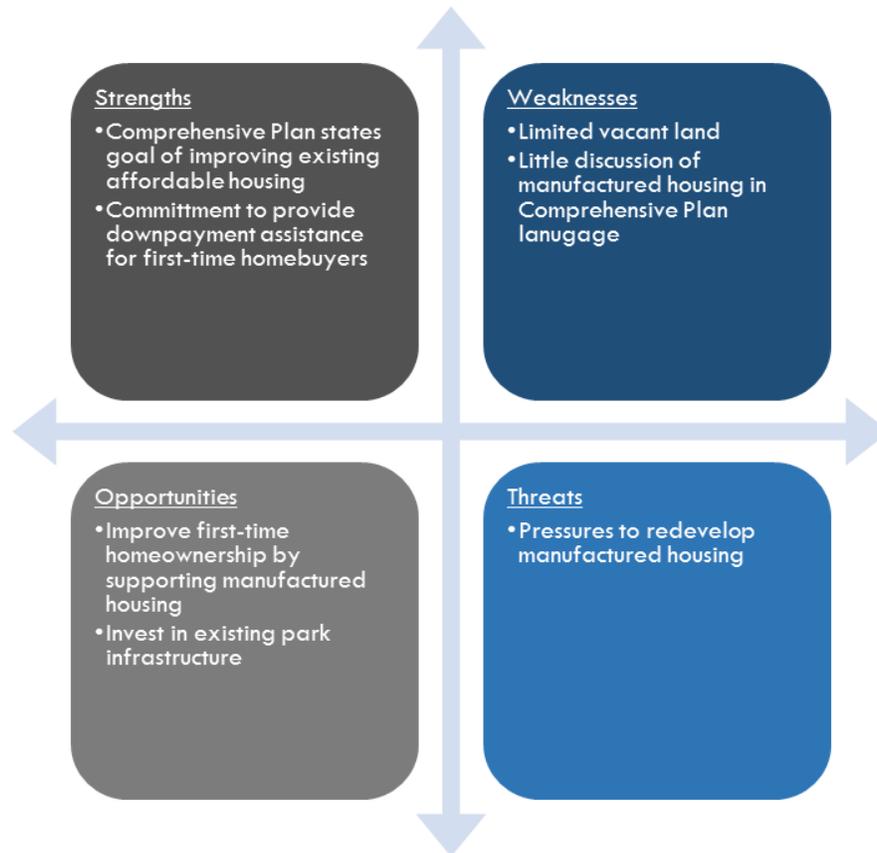


All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

young adults, aging seniors, and encouraging easier access to homeownership. People living in manufactured housing in the Twin Cities are generally more diverse and have lower incomes than the general population.

SWOT Analysis



This analysis of strengths, weaknesses, opportunities, and threats (SWOT) presents the current state of policymaking in your community related to manufactured housing and drives the policy suggestions that are listed on the first page of this letter and detailed in the Guide to Manufactured Housing Best Practices below. This analysis suggests that Bloomington has made some important progress in some areas with manufactured housing, but also that there is ample room to improve in serving its manufactured housing residents.

We note that many stated goals in the City’s Comprehensive Plan are in line with various benefits that can be gained from improving the manufactured housing stock available in Bloomington: “Strategy 3.1 Provide multiple methods of providing affordable housing ... Strategy 3.2 Foster affordable housing of various types ... Strategy 3.3 Preserve existing affordable housing.”³ Our Guide to Manufactured Housing Best Practices, attached below, describes ways that manufactured housing complements these goals. Bloomington has the opportunity to provide low-income homeownership to its residents by increasing investment in the infrastructure and maintenance of its manufactured housing parks. The City can also set standards for the infrastructure and design of manufactured housing to ensure quality, and to preserve manufactured housing as an appealing resource in the community.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Guide to Manufactured Housing Best Practices

The bottom line is that manufactured housing creates opportunities for unsubsidized, affordable, first-time homeownership for individuals who would otherwise never be able to own a home. The pressure that the Great Recession has placed on local economies has generated considerable burdens upon both government resources and low-income populations, pointing to the need to identify and leverage the underutilized value of manufactured housing in your City's housing implementation strategies and comprehensive plan language.

The following sections describe key areas to consider regarding the successful use of manufactured housing as a means of meeting your City's affordable housing needs. These are areas that your City's Comprehensive Plan should clearly identify and describe. Some basic alterations to language and policies can help ensure that manufactured housing remains a safe, long-term, cost-efficient, and affordable housing option for your City's residents.

1. Use manufactured housing to address affordability without new large-scale multifamily construction

High-density housing is considered ideal for developing affordable housing because connecting developments to utility infrastructures is less costly than it is in low-density areas. According to CFED, manufactured housing is "Produced in one-fifth the time and at half the cost of site-built homes, manufactured housing assembled in a controlled, factory environment uses fewer materials and generates 35%-40% less waste than comparable site-built units."⁴ New Energy Star manufactured housing is capable of blending in with other types of housing, has higher energy-efficiency levels than site-build housing, and is much more time and cost-efficient to build:

on a per dwelling unit (DU) basis, manufactured homes have significantly lower environmental impacts and are more sustainable across a range of key sustainability indicators than either single family homes or the condominium/town home units. Apartments have lower impacts in many areas due to their small size and density; however, they are not as affordable and do not provide home ownership benefits. While these benefits will vary by location, community age, density and other factors, this case study is representative of the types of benefits manufactured homes provide.⁵

These qualities suggest that manufactured housing provides a valuable tool to meet the affordable housing needs of your community, and has the potential to boost the sustainability of your community through investment in Energy Star homes, infrastructure, and retrofits.

Often, in suburban regions, high-density areas available for affordable housing development are scarce, which hinders a city's ability to easily generate new cost-effective affordable housing, a problem identified in Bloomington's Comprehensive Plan: "Today, less than two percent of Bloomington's 24,540 acres (38.3 square miles) is vacant."⁶ This problem applies to Bloomington because it is near fully-developed. Because input time, waste, and costs are far lower for manufactured housing, it presents a way to get around this barrier, and is positioned to improve affordable housing rates and raise densities outside of the City's center. As the Metropolitan Council suggests,

Manufactured home parks help ameliorate the shortage of housing affordable to low- and extremely low-income residents and do so without public subsidies. [Our data] shows that compared to the region's share of housing units that are affordable to people who make 30% and 50% of Area Median Income, a much higher



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

portion of the manufactured housing units are affordable to residents in these income levels. Manufactured home parks are distinctive as a housing option for many economically disadvantaged residents.⁷

Supporting existing manufactured housing to generate cost-effective, mid-range density affordable housing can help address problems associated with finding enough scarce high-density land to support it. Doing so would also help align with NIMBY (“not-in-my-backyard”) positions that insist that low-income housing should be spread out, and not be concentrated in the center of the city, which lower input costs associated with high-density areas incentivize. Investing in manufactured housing can help reduce the concentration of affordable housing in the city center and can alleviate pressures created by not being able to find high-density areas that are readily available for new affordable housing development.

2. Change ordinances to allow manufactured homes to be sited in residential districts outside existing parks

Altering ordinances to allow manufactured homes to be sited in residential districts outside parks is a common practice in Greater Minnesota. Research shows that manufactured and site built homes share the same levels of durability, longevity, craftsmanship, and aesthetic quality, while manufactured housing allows for substantial savings on time, waste, and input costs.⁸

Modern manufactured homes blend into surrounding neighborhoods, and if managed properly, do not lower surrounding property values or raise crime rates more than other types of housing. Concentrated poverty and poor management practices, not simply the presence of low-income housing, have been identified as problems that destabilize communities. A 2010 University of Chicago academic article suggests that manufactured housing is not more likely to contribute to crime than other forms of housing.⁹ The Thrive MSP 2040 report, which is supposed to guide cities in planning, also refutes the myth that affordable housing contributes to either higher rates of crime or lower property values.¹⁰

These points suggest that the City of Bloomington and its residents consider the evidence whenever tempted to make negative claims about the value of manufactured housing and affordable housing, and that a more nuanced perspective would identify well-managed manufactured home parks as a valuable resource to the community. Ordinances that allow individual manufactured homes to be sited outside of home parks would allow residents to purchase land underneath their homes, allowing them to become more invested in successfully managing their own property while also boosting the City’s affordable housing rate.

3. Improve your City’s level of affordable housing by reducing loan barriers to move residents into currently available manufactured housing units

Bloomington can expand its affordable housing without building new units. Within the City’s manufactured housing parks, there is room for more affordable living options. The table above (see Page 2) shows **a total of 9 vacant lots and 11 vacant homes—a total of 20 currently available affordable living sites in Bloomington’s manufactured housing supply**. These vacancies exist as easy “low-hanging fruit” – relatively simple opportunities that the City can use to improve its supply of affordable housing in the short term.

Enabling interested potential residents to move into these units can help the City capitalize on a substantial set of underused resources, making them work for its bottom line as well as for the overall wellbeing of the community and low income individuals. The Metropolitan Council states,



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

unused manufactured home park capacity presents an opportunity for the region to expand its affordable housing stock. If all of the empty pads had a double-wide home placed on them and a family moved into each unoccupied home, the region could provide affordable housing to 1,164 additional families. If each empty pad had a single-wide home on it and a family rented or owned all of the unoccupied homes, this would mean 1,868 more affordable homes in the region. To put this number in context, in 2014, the region added 777 units that were affordable to households who made 60% or less than the Area Median Income.¹¹

Helping reduce financial barriers faced by these individuals, such as making quality loans easier to obtain, can decrease vacancy rates and increase your City's affordable housing level. Although sales have dropped since the Great Recession, this does not reflect a reduced demand for manufactured housing:

"While demand for affordable housing remains high, the tightened credit market has devastated the industry," said Fridley Mayor Scott Lund, who sells manufactured homes and owns a manufactured-home community ... "the tightening of the financial market has caused less people to get loans to purchase manufactured homes."¹²

In Minnesota, manufactured homes are still considered private instead of real property, which places substantial disadvantages upon residents who are seeking loans to purchase them.¹³ Chattel loans provide fewer consumer protections, for example, and have much higher interest rates.¹⁴ Given that demand is still high for manufactured homes, programs should be established that are specifically tailored to help potential manufactured housing residents obtain loans to fill vacancies and reduce any associated consumer protection problems. Partnerships with local banks and loan providers could help accomplish this goal.

4. Generate funding opportunities for repair and maintenance, and set standards for infrastructure in manufactured housing parks

Bloomington's Comprehensive Plan identifies a need to address renewable energy in housing and the City's intention to "promote the use of solar energy."¹⁵ The Comprehensive Plan states, "Given Bloomington's emphasis on creating an even more sustainable community, the uncertainty in future fossil fuel supplies and concerns about the negative environmental impacts of using fossil fuels, alternative energy sources will become increasingly important in the future."¹⁶

Investment in the infrastructure and rehabilitation of Bloomington's manufactured housing supports this objective. New manufactured housing is energy efficient, making it ideal for communities attempting to generate sustainable low-income housing: "Compared to a typical HUD Code manufactured home, an Energy Star qualified manufactured home can save homeowners from \$190 to \$246 a year in average energy costs, or 24% to 29% of total heating and cooling costs."¹⁷ Numerous options to improve the energy efficiency of older manufactured homes are also available.¹⁸

One option is to support the repair and replacement of pre-1976 homes with energy efficient homes in rehabilitation and weatherization programs, matched savings programs (Assets for Independence) and energy subsidy programs (Low Income Housing Energy Assistance Program). The City could pursue infrastructure improvements for a manufactured home park where at least 51 percent of the residents are low or moderate-income persons eligible for CDBG funding.¹⁹



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

As energy-efficient affordable housing is becoming more popular due to falling costs of solar and other “green” technologies, manufactured housing has emerged as a particularly useful way to implement them. The input costs of green technologies in manufactured housing parks can be far lower than site-built housing and may also present additional qualities that make it highly advantageous to support emerging green technologies. For example, manufactured housing parks probably catch more sunlight than areas with more variety in building height, giving them a comparative advantage when it comes to installing solar panels on roofs, which could then be networked together to sell energy back to the grid.

Standards should be set for manufactured home parks’ physical plant, including roads, water supply, trash disposal, lighting, pest control, electrical service, and sewer systems. Historically, guidelines have not been in place to preserve manufactured housing, which enables critics to cite decrepit infrastructure as an argument against manufactured housing overall. This argument is unfair, and does not take into consideration that park residents have traditionally faced scorn from city governments and local residents, in addition to poor management, all factors which have reduced their ability to obtain political and financial support to make these improvements in the first place. Manufactured housing residents may possess little capacity to make such widespread improvements without substantial support. If infrastructures are well managed in manufactured housing communities, there is no reason that high levels of quality, safety, and physical appeal cannot be attained.

5. Encourage resident purchase of communities through local tax incentives and first refusal rights

The creation of resident-owned communities can improve manufactured housing parks as an affordable housing option. There are currently seven resident-owned park cooperatives in Minnesota, and many more nationwide.²⁰ Residents may form a cooperative that gives them management responsibilities, which has the potential to greatly reduce tensions between residents and management, a common problem that exists in many parks. Owning land under their homes presents a variety of potential benefits to residents, who have more opportunities to make changes and preserve parks in ways that they see fit. The City of Bloomington could support resident ownership of its parks as a way of improving resident investment and accountability to the community.

Resident-owned cooperatives have the potential to improve public safety, investment in infrastructures, park attractiveness, and the upward economic mobility of residents as the collective works to address its own immediate needs instead of depending on a manager or owner to handle them. Because residents have a unique sense of buy-in and responsibility to their neighborhood and community as part of a cooperative, they are often able to avoid problems commonly faced by parks with a more traditional governance structure. Providing tax incentives to make it easier for residents to purchase their parks could greatly enhance manufactured housing as a resource in your community. For example:

- CDBG funding can help residents to finance the purchase of a park.
- A city or a community development housing organization (CDHO) can apply for the 15 percent of a HOME allocation that is exclusively available to CHDOs and the additional 5 percent of the HOME allocation that may be used for capacity-building activities of CHDOs.
- Waive or reduce transfer taxes when a park owner sells the property to the residents.
- Waive or reduce business licensing fees for resident-owned communities.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

- Forgive tax liens or liens for municipal services on a resident-owned community that were imposed when the property was owned by an investor owner.

Related to the creation of resident-owned communities is the use of rights of first refusal provided under state law that enables residents to purchase a park upon notice of closing, as long as they can meet the standing offer. Extending time limits to enact these rights would give park residents an additional means of preserving affordable housing rates in the community, and ultimately reduce the financial and emotional stresses associated with being forced to move. Rights of first refusal could be enhanced with a local ordinance that provides an extension of time to submit corresponding paperwork upon any zoning change, as in Stacy, Minnesota:

§ 114.09 EXTENSION OF PERIOD OF RESIDENTS' RIGHT TO PURCHASE

Before the execution of an agreement to purchase a manufactured home park, the purchaser must notify the park owner, in writing, if the purchaser intends to close the manufactured home park or convert it to another use within 1 year of the execution of the agreement. The park owner shall provide a resident of each manufactured home with a 180-day written notice of the purchaser's intent to close the park or convert it to another use. During this 180-day notice period, owners of at least 51% of the manufactured homes in the park, or a nonprofit organization which has the written permission of the owners of at least 51% of the manufactured homes in the park to represent them in the acquisition of the park, shall have all rights to purchase the park as afforded under M.S. § 327C.095, Subd. 6.

(Ord. 2007-7-1, passed 7-17-2007)²¹

6. Promote manufactured housing within your comprehensive plan and other city outlets as a primary unsubsidized affordable homeownership option for low-income working residents

Manufactured housing is a substantial source of resident-owned affordable housing. Resident-ownership is a valuable way of building assets in low-income communities. Bloomington's Comprehensive Plan identifies this potential in its goal to "Encourage 161 affordable homeownership units for families and individuals."²² Resident ownership allows for investment in property that can be sold at a later date for profit, and provides resident-owners with a sense of responsibility to their neighborhood, fostering higher investment in upkeep, maintenance, and public safety. Most residents of manufactured homes own them, which is a valuable characteristic that no other type of housing can match:

Manufactured housing units also offer homeownership opportunities to families for whom ownership is otherwise difficult or not possible. In fact, the homeownership rate among manufactured home residents (90%) is higher than the rate for the residents who live in other types of homes (74%).⁹ Moreover, as Figure 3 shows, manufactured units house families at costs that are much lower than other types of housing with median monthly housing costs for manufactured home owners only 55% of the median monthly housing costs of homeowners in the region.²³

Because resident-owners typically stay in place for a longer period of time, their presence increases the stability of communities, and because they have devoted a higher level of investment in their homes, they are more incentivized to care for their community and to be interested in the safety and wellbeing of their peers. This increases levels of social-capital and buy-in among members of a community, which are critical factors that contribute to building economic mobility through asset development and maintaining successful neighborhoods:



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Home equity is a major source of personal wealth in the United States. It comprises roughly one-third (31.8%) of net worth for American households. Home equity plays an even more important role for low- and middle-income families, accounting for approximately half of the net worth of families in the bottom 60% of the income distribution in 2007.²⁴

Manufactured housing is workforce housing. Connecting low-income working individuals in Bloomington to adequate transportation and housing can facilitate their upward mobility instead of pushing them back into poverty. Due to the economic “multiplier effect,” this is in the best interest of all businesses in the community because greater numbers of individuals have the opportunity to purchase their goods and services, and work for them.

7. Actively reduce stigma against manufactured housing

The more that low-income individuals are denied opportunities to fully participate in the workplace or to secure essential needs such as housing, the more likely they are to resort to socially-destabilizing behavior, such as property crime to compensate for immediate financial needs, or to alcohol consumption and substance abuse as “self-medication” for trauma and stress when these needs are not met. These patterns of behavior can impose far-reaching destabilizing effects upon entire communities, and pose threats to the wellbeing of the community as a whole, not just its low income individuals. Supporting ordinances, rhetoric, policies, and institutional practices that undermine and withhold value from low-income populations is not in the best interest of your community overall, and these approaches are not a sustainable or cost-efficient use of public taxpayer revenue.

Creating programs and funds that train individuals to better care for their homes by teaching them skills that they can use into the future would be a more effective use of your City’s time and money than policies that seek to regulate behavior through punishment, and would build these communities up to be better participants in the City overall, instead of continuing the legacy of destabilization that has traditionally and consistently denied wellbeing to low-income individuals in manufactured home parks.

One of the common stigmas that park residents face is that their mode of housing is associated in public discourse with transience, irresponsibility, and disrepair. We do not call manufactured home parks “trailer parks” anymore, not only because of the unfortunate association of the term “trailer trash” and its negative connotations, but also because the term “trailer” no longer represents the actual use of most manufactured homes, which most often stay in place for their entire lifetimes. The idea that manufactured homes are easily moved contributes to a lack of public awareness of the problems that residents face when they are forced to move due to a park closure or change of use, and translates into additional burdens placed on the residents by outsiders who assume that moving should be no problem for them. The term “mobile home” is outdated for the same reason:

Although most “mobile” homes are never moved and new manufactured home placements are increasingly titled as real estate rather than personal property, we estimate that nearly two-thirds of them – most of which are located in land-lease communities – are still titled like automobiles rather than as real estate. Titling manufactured homes as personal property increases homeowners’ difficulty in obtaining mortgage financing. With personal loans instead of mortgages, these owners lose out on many of the consumer protections afforded to buyers of site-built homes.²⁵

Many residents of manufactured housing parks are disabled, elderly, minorities, and/or veterans, which means that when a city or community acts in discriminatory ways against park residents, it is adding increased burdens



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

upon already heavily stigmatized and disadvantaged populations. According to the Metropolitan Council's recent report, "In manufactured home parks, 44% of residents live in households with incomes at or below 185% of federal poverty level, compared to 22% of all residents in the region. The parks are also an important source of housing for the region's residents with disabilities: 14% of the park residents have disabilities compared to 9% of the residents of the region."²⁶

A study by the Consumer Financial Protection Bureau' states that its "findings underscore the importance of the manufactured housing sector as a source of affordable housing for some consumers, including those outside of metropolitan areas, older households, and lower-income households. At the same time, these same groups include consumers that may be considered more financially vulnerable and, thus, may particularly stand to benefit from strong consumer protections."²⁷ Developing a plan to educate your community on these issues can help dispel the myths associated with manufactured housing. This letter articulates many points that you can use to develop an awareness-building strategy.

Research suggests that a primary reason that affordable and manufactured housing has so much stigma attached to it is that it has been poorly managed, not simply because low-income residents necessarily cause trouble or reduce property values in surrounding neighborhoods. One study states, "well-designed and well maintained or managed manufactured houses would not negatively impact adjacent properties."²⁸ In addition, well-managed manufactured housing is unlikely to cause higher crime rates in surrounding areas.²⁹ The Metropolitan Council has also attempted to dispel fears related to affordable housing in a recent publication, suggesting, "The design, management, and maintenance of any residential property determine whether or not it is a detriment or asset to its neighbors, regardless of the income of its inhabitants."³⁰ These points suggest that supporting manufactured housing in your communities can create substantial value, regardless of stigma against it.

We recommend that your City adopt approaches towards manufactured housing populations that ultimately help residents foster healthier behavior and build strong, sustainable communities. Recognizing that the whole community stands to benefit from improving the stability of its most vulnerable members can help overcome political pressures that stigmatize the poor and disadvantaged. Discriminatory policies self-reinforce the stigma that they are founded upon, and their supporters often fail to recognize that such policies have largely been responsible for the undesirable outcomes they seek to punish. Instead of fostering dysfunction in low-income communities by withholding resources from them, it is in the long-term best interest of cities, planners, and communities overall to facilitate community-level supports and services for manufactured housing park residents, investment in and rehabilitation of park infrastructures, and to reduce and rescind overly-disruptive policies that target them and destabilize their wellbeing.



All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

Resources

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All Parks Alliance for Change ■ APAC

An Organization of Manufactured Home Park Residents

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