

ENDANGERED:

San Antonio's Vanishing Mobile Home Parks and a Path for Preservation

Former site of Rolling Home Trailer Courts

JANUARY 2020

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Table of Contents

Executive Summary	iii
Acknowledgments	v
About the Authors	v
Introduction.....	1
Inventory of San Antonio’s Mobile Home Parks	1
Recent Mobile Home Park Closures: 2014-2019	3
Present Threats	5
Substandard conditions.....	5
Environmental hazards.....	7
Neighborhood change.....	7
Public redevelopment incentive programs.....	8
Zoning and future land use.....	8
10 Policies for Preserving San Antonio’s Mobile Home Parks.....	9
Appendices.....	14
Appendix 1. Map of Mobile Home Parks in San Antonio, TX.....	14
Appendix 2. Map of Mobile Home Parks and San Antonio City Council Districts	15
Appendix 3. Map of Mobile Home Park Clusters in San Antonio, TX	16
Appendix 4. Map of Mobile Home Parks in San Antonio’s Urban Core	17
Appendix 5. Map of Inspection Status of Mobile Home Parks (May 2019).....	18
Appendix 6. Map of Mobile Home Parks and Environmental Hazards.....	19
Appendix 7. Map of Mobile Home Parks and Neighborhood Change Typology	20
Appendix 8. Map of Mobile Home Parks and NALCAB Neighborhood Change	21
Appendix 9. Map of Mobile Home Parks and Development Incentive Programs	22
Appendix 10. Mobile Home Park Closures in San Antonio Since 2014	23

ENDANGERED:

San Antonio's Vanishing Mobile Home Parks and a Path for Preservation

Executive Summary

Mobile home parks are vanishing in San Antonio at an alarming rate, with the closure of at least nine mobile home parks since 2014. Without intervention by the city, dozens more mobile home parks are at risk of closing, impacting the housing security of thousands of the city's most vulnerable residents.

Mobile home parks provide a critical source of unsubsidized affordable housing for the poorest and most marginalized residents of San Antonio. Close to 22,000 residents in San Antonio, or 1.5% of the city's population, live in approximately 8,000 mobile homes, with most of these homes located in the city's remaining 88 mobile home parks. When residents are displaced from their mobile home communities, many are unable to move their homes and confront hardship navigating a housing market with very few viable housing alternatives.

Key Findings

The following are key findings regarding the greatest threats to San Antonio's remaining 88 mobile home parks:

- **City land use policies:** The city's land use policies foster the redevelopment of mobile home parks. Close to two-thirds of the city's mobile home parks are not zoned as a Manufactured Housing District (MHD), the city's special zoning category that protects parks from redevelopment for more intensive uses. Meanwhile, the city's future land use plans for 30% of mobile home parks call for more intensive uses. Additionally, for those parks that are zoned as MHD, when a mobile home park owner requests a zoning change for the site, the city still has no process in place to ensure that the residents receive notice of the requested change, despite calls for this policy change by the Mayor's Task Force on Preserving Dynamic and Diverse Neighborhoods in 2015.
- **Public redevelopment incentive programs:** Several areas where the city and federal government are incentivizing redevelopment in San Antonio overlap with clusters of mobile home parks, placing additional redevelopment pressures on these parks. Twenty-eight mobile home parks are located within the bounds of at least one major redevelopment incentive program. Eleven of these parks are located in the Mission Reach area, an area at the nexus of multiple redevelopment incentive programs and where mobile home parks are especially vulnerable to redevelopment. Four of the parks that have closed since 2014 were located in this area.
- **Neighborhood change:** Close to 72% of open mobile home parks are located in gentrifying areas or areas susceptible to gentrifying, placing these homes at a heightened risk of redevelopment. Mobile home parks in gentrifying areas that overlap with areas of concentrated public redevelopment incentives are at an especially high risk of redevelopment.
- **Substandard conditions:** One of the biggest threats to mobile home parks in San Antonio is the widespread prevalence of deteriorating, substandard conditions in parks across the city. Of the nine parks that closed since 2014, seven closed in direct response to city code enforcement actions. As of May 2019, more than half of mobile home parks had failed their code inspection with the city. Notably, some parks may be experiencing deteriorating conditions as the owners anticipate redevelopment opportunities. For example, eight of the eleven remaining parks in the Mission Reach area—an area undergoing redevelopment—failed their most recent inspection (as of May 2019).

10 Policies for Preserving San Antonio's Mobile Home Parks

Fortunately, there are many actions that the City of San Antonio can take to preserve and improve the city's mobile home parks, ideally as part of a comprehensive mobile home park preservation program. The following are ten policies recommended in the report that the City could adopt and that would improve the living conditions and housing stability of thousands of mobile home park residents in San Antonio:

- 1** Adopt zoning and future land use protections for mobile home parks and residents.
- 2** Provide residents with a right to purchase their mobile home parks.
- 3** Require relocation notice and a relocation plan for mobile home park conversions.
- 4** Enhance protections for resident organizing and education.
- 5** Create a local fund to support tenant acquisitions of mobile home parks.
- 6** Provide home repair assistance to mobile home park residents.
- 7** Create a mobile home preservation network.
- 8** Create a mobile home park preservation officer position.
- 9** Adopt preservation plans for vulnerable areas receiving public redevelopment incentives.
- 10** Enforce the Mobile Living Park ordinance's bond and relocation costs requirements.

Acknowledgments

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About the Authors

Heather K. Way is a clinical professor at The University of Texas School of Law, where she directs the Entrepreneurship and Community Development Clinic. Heather has more than twenty years of experience in housing policy, and her work has contributed to the development of many state and local policy innovations in the fields of affordable housing preservation, land titling, and problem properties. She is the founder of the Uprooted Project, a new, interactive website featuring strategies for addressing displacement in gentrifying neighborhoods in Texas. <https://sites.utexas.edu/gentrificationproject/>.

Carol E. Fraser holds a Master of Science in Community and Regional Planning and a Master of Science in Sustainable Design, both from the University of Texas at Austin's School of Architecture. Carol has extensive experience in housing policy research, particularly involving geographic information systems (GIS) and qualitative analysis of municipal community development programming. Together with Prof. Way, Carol is the co-author of prior work focused on unsafe housing conditions in apartments in Houston, Texas.

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Introduction

This report focuses on the preservation of mobile home parks in San Antonio. Mobile home parks provide an important source of unsubsidized affordable housing for the poorest and most marginalized residents of San Antonio. At the same time, mobile home park residents are highly susceptible to displacement from redevelopment pressures in the city's urban core, as well as substandard living conditions. Since 2013, at least nine mobile home parks in the city have closed down due to unsafe conditions or redevelopment opportunities, displacing hundreds of residents. Without intervention by the city, many more mobile home parks are highly vulnerable to being closed down in the future, impacting the housing security of thousands of the city's most vulnerable residents.

In particular, this report focuses on pressures driving mobile home closures in San Antonio; identifies mobile home parks that are the most vulnerable to closure in the future; and pinpoints key actions the City of San Antonio could take to preserve these parks and improve mobile home residents' access to stable, safe, and affordable housing. This report builds upon the work conducted by the [Mayor's Task Force on Preserving Dynamic and Diverse Neighborhoods](#), a group tasked with reconciling a desire for central city growth with the preservation of affordable housing, including mobile home parks.¹ Among its recommendations released in 2015, the Task Force called for an assessment of the current inventory and condition of San Antonio's mobile home parks, in addition to a toolkit addressing displacement of mobile home communities.

Inventory of San Antonio's Mobile Home Parks

Close to 22,000 residents in San Antonio, or 1.5% of the city's population, live in approximately 8,000 mobile homes.² Most of these homes are located in the city's 88 open mobile home parks, although some of the homes are located on single-family tracts of land or otherwise outside of the parks.³ In San Antonio, as in many other cities, mobile homes are largely confined by the city's zoning code to areas specially zoned for mobile home parks or in other areas as grandfathered uses.

The city's mobile home parks contain varying compositions of mobile living units, including mobile homes, HUD-certified manufactured homes, recreational vehicles, and camping trailers. For purposes of this report, we refer to all of these housing typologies as "mobile homes," unless otherwise noted.

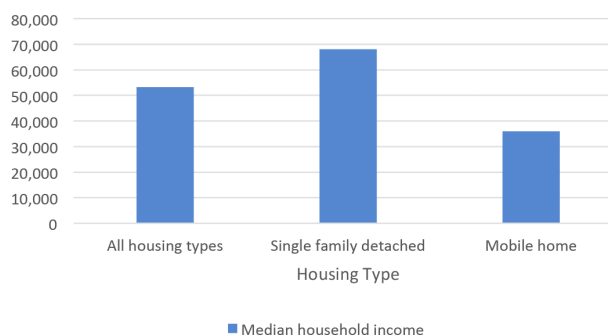
Mobile home residents are, overall, much poorer than other residents, with close to one out of four mobile home households in the San Antonio metroplex living in poverty.⁴ The median household income for mobile home residents in the region is \$36,000, which is half of what residents in detached single-family homes make (\$68,000), and significantly less than the overall median household income for the region, \$53,200.⁵ Mobile home residents are also much less likely to have a college education



RV in Ranch House Trailer Park

Figure 1:

Median Household Income by Housing Type:
San Antonio Metro Area



Data Source: American Housing Survey (2017).

than other residents in the area. Otherwise, the demographics of mobile home residents (i.e., race, ethnicity, age and disability) in the San Antonio metro area are pretty similar to other residents in the region.⁶

Mobile home residents in the metroplex pay a lot less for their housing, with overall monthly housing costs of \$753, compared to \$1,005 a month for all housing types in the area.⁷ Close to a third of occupied mobile homes are at least thirty years old.⁸

In a mobile home park, a third party owns the land and property infrastructure (such as streets and common areas) and leases individual sites, or pads, in the property to residents, who typically own the mobile home placed on the pad. Some mobile home park residents lease their mobile home along with the pad.

San Antonio's mobile home parks range in size. On average, the city's mobile home parks contain 95 registered mobile home sites per park. The largest park contains 819 sites that are registered with the city, while close to 50 percent of parks contain 30 or fewer sites.⁹

Mobile home park ownership

While some mobile home parks are still owned by smaller, local mom-and-pop operations in San Antonio, mobile home parks are a growing investment vehicle for large private equity funds, with institutional investors accounting for 17% of mobile home park acquisitions nationwide in 2018, up from 9% in 2013.¹⁰ In San Antonio, approximately one quarter of the open mobile home parks operating are owned by out-of-state investors.¹¹ One large private equity firm, Yes Communities, owns at least five open mobile home parks in the city, along with another 54,000 mobile home sites around the country.¹²

Location of mobile home parks

San Antonio is one of the most economically segregated metropolitan areas in the country, and its development and housing patterns remain largely entrenched.¹³ Even as the city's central core has redeveloped over the past decade, lower-income populations remain concentrated in the southern, eastern, and western parts of the city, while higher-income populations reside largely in the northern part of the city.¹⁴

Figure 2.

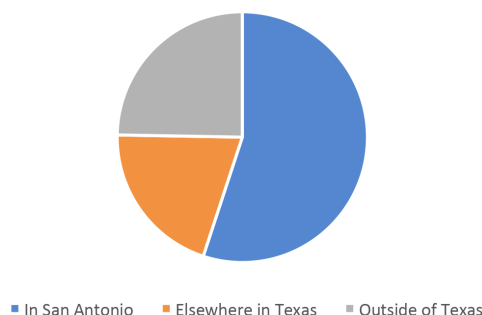
Monthly Housing Costs by Housing Type: San Antonio Metro Area (2017)

Housing Type	Monthly Housing Costs
All housing types	\$1,005
Single family detached	\$1,118
Mobile home	\$753

Data source: American Housing Survey, 2017.

Figure 3.

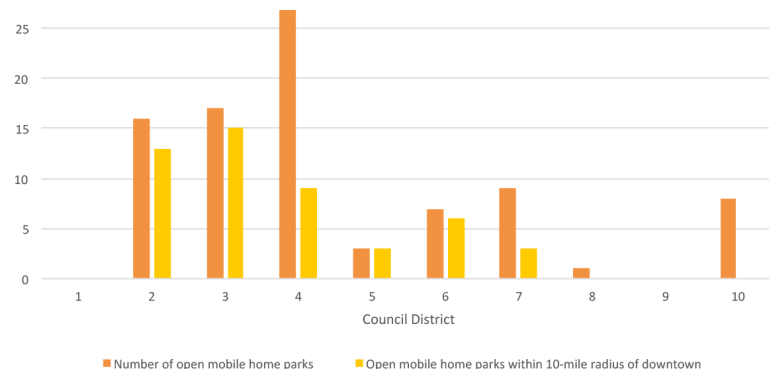
Mobile Home Parks in San Antonio: Local versus Non-Local Owners



Data Source: Bexar Central Appraisal District, July 2019

Figure 4.

Open Mobile Home Parks in San Antonio by Council District



Data Source: City of San Antonio and original research.

The uneven distribution of mobile home parks in San Antonio reflects these development patterns. See Appendix 1, which shows all mobile home parks on the city's mobile living park registration list, including open, closed, and inactive/unknown parks, as of mid-2019.¹⁵ Almost 70% of open mobile home parks are located in City Council Districts 2, 3, and 4, while Council Districts 1 and 9 do not have any open mobile home parks. Council Districts 2, 3, and 4 have the highest percentage of open mobile home parks within a 10-

mile radius of San Antonio's downtown. See Figure 4 and the map in Appendix 2.

Many of the city's mobile home parks are located in clusters, with the largest clusters located in the Mission Reach area, the corridor along Austin Highway to the northeast, and in the far western and southwestern corners of the urban core. See Appendix 3.

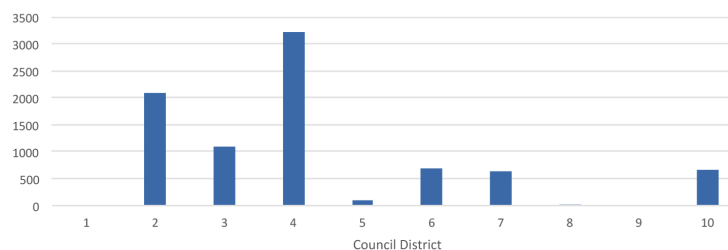
The clustered nature of mobile home parks in an area, such as the Mission Reach area, can amplify the impact of appreciating real estate values in the area, placing a larger number of residents at risk of displacement.

Often located in industrial areas, several mobile home parks in San Antonio share the same premises as auto body shops, gas stations, or warehouses. Quite a few are located along waterways that threaten to flood the parks after a heavy rain.

At the same time, many mobile home parks in San Antonio are located in highly desirable areas for residents.¹⁶ More than half of the city's mobile home parks (56%) are located in the central city (roughly within the bounds of IH-410), with eleven of these parks located within five miles of downtown, where there is generally better access to jobs, public transit, and social services. See Appendix 4.

Figure 5.

Number of Registered Sites at Open Mobile Home Parks in San Antonio by Council District



Data Source: City of San Antonio and original research.

Recent Mobile Home Park Closures: 2014-2019

Since 2014, San Antonio has seen the loss of at least nine mobile home parks.¹⁷ The number of closed parks may actually be larger, since the City's mobile living park registration list, which tracks the status of mobile home parks, includes a number of mobile home parks with an "inactive" or "unknown" status. Our Google Maps search of these inactive/unknown properties identified four parcels with numerous vacant mobile home pads or utility hookups—indicating that the property was once home to a mobile home park—as well as parcels with multiple mobile homes on them, although it was unclear whether those homes were occupied.

We also identified one mobile home park that closed in the latter part of 2019 after the date of the city's registration list. Additional parks may have closed since the city released its inspection list to us in mid-2019.



Image of Rolling Home Trailer Courts post-closure

Figure 6.**Mobile Home Parks Closures: 2014 to 2019**

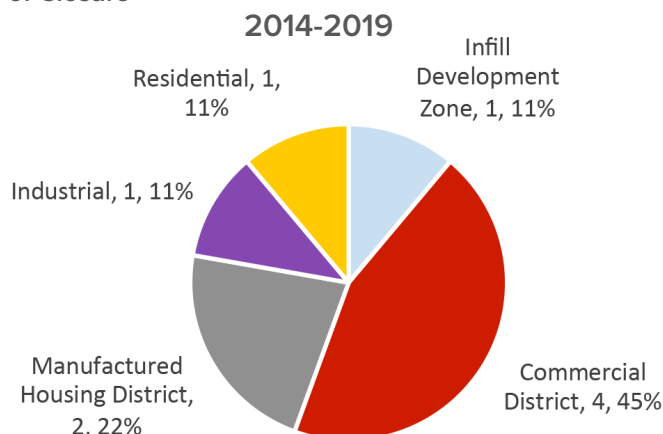
Mobile Home Park Name	Address	Year of Closure	Conditions Surrounding Closure
Mission Trails	1515 Mission Road	2014-15	Rezoned for infill development, city subsidies, and location in gentrifying census tract and Mission Reach area; property redeveloped as a higher-end mixed-use development
Plaza Mobile Home Park	811 Corinne Drive	2016	Substandard conditions; city notice to vacate; located along Austin Highway corridor investment area; commercial district zoning
Oak Hollow Mobile Home Park	6348 Prue Road	2017-18	Substandard conditions; city notice to vacate; commercial district zoning
N/A	7912 Fredericksburg	2018	Substandard conditions; city notice to vacate; commercial district zoning
Smith-Gevers Mobile Home Park	133 Vine Street	2018	Substandard conditions; city notice to vacate; gentrifying census tract; rezoned in early 2019 (after closure) from residential to infill development zone permitting 15 townhomes
Vails Mobile Home Park	540 New Laredo Highway	2018	Substandard conditions; city notice to vacate; gentrifying census tract
Hurley Rental Park	11033 Pleasanton Road	2018	Substandard conditions; no city notice to vacate but lawsuit brought against property; in Opportunity Zone and gentrifying census tract; located near the Mission Reach area
N/A	1111 Herbst Street	2018	Substandard conditions; city notice to vacate; in Mission Reach area and Tax Increment Reinvestment Zone
George's Trailer Park	326 Riverside Drive	2019	Property located in Mission Reach area and sold to developer; commercial zoning; the park also failed multiple city inspections

The closed parks ranged in size, with one site containing only one occupied home at the time of closure, while the Mission Trails Mobile Home Park housed hundreds of residents. Analyzing these nine closures reveals the impact that redevelopment pressures—fueled in part by city economic development and land use policies—have had on the city’s mobile home parks.

- Seven of the nine closed mobile home parks were located within the urban core of San Antonio, indicating more acute redevelopment pressures on these parcels. See Appendix 4.
- Four of the closed parks were located in or near the Mission Reach area, a target of multiple public investment projects in recent years, including a \$245 million restoration of the San Antonio River, a Tax Increment Reinvestment Zone, and corridor improvements. See Appendix 9.
- Of the seven parks that have closed since 2018, three were located in gentrifying census tracts and two in areas susceptible to gentrification. See Appendix 7.
- As for the land use status of the closed mobile home parks, two of the parks were zoned as a Manufactured Housing District, the City’s special zoning district for mobile home parks; six of the other properties were zoned for more intensive land uses at the time the parks closed.

Figure 7.

Zoning Status of Closed Mobile Home Parks in San Antonio at Time of Closure



Understanding these pressures also provides insights into areas where the city’s remaining mobile home parks are most vulnerable to closing down, as discussed further in the next section of the report.

Unsafe living conditions and code enforcement actions also played a large role in the closure of these parks. Seven of the mobile home parks closed after the city sent notices to vacate to the residents or legal action was brought against the property. The property owners of these parks may have also been responding to redevelopment opportunities in allowing their properties to deteriorate, especially for those parks located in gentrifying areas or experiencing other redevelopment pressures. Only two of the seven parks that closed were located in areas that were not undergoing gentrification or susceptible to gentrification.

Present Threats

Of the city’s remaining 88 open mobile home parks, many are highly vulnerable to being closed down due to a number of threats, including substandard living conditions, dangerous environmental conditions, public redevelopment incentives, neighborhood changes, and lack of zoning protections.



Sewage leak at Oak Hollow Mobile Home Park

Substandard conditions

One of the biggest threats to mobile home parks in San Antonio is the widespread prevalence of deteriorating, substandard conditions. In the course of our research, we conducted drive-by visual surveys of the exterior conditions at close to a quarter of open mobile home parks in the urban core of San Antonio, mainly the clusters of parks located in the Mission Reach area and Austin Highway corridor. Our visual surveys confirmed that the majority of these parks consist of relatively old (30-plus years) mobile homes, with many homes in very poor condition. The homes likely could not withstand a move to another property. At many properties, we also saw poor infrastructure within the park, such as unpaved roads with large potholes and poor storm water drainage, as well as a lack of safety features such as overhead lighting.

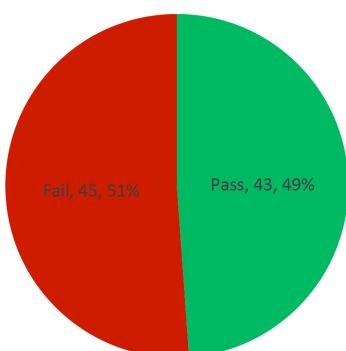


Mobile home at Riverside Terrace Mobile Home Park

The City's Mobile Living Park ordinance¹⁸ was overhauled in December 2017 to better address external conditions and infrastructure issues at mobile home parks, with a required annual inspection by the City's Development Services Department (DSD). While the ordinance has led to improvements at several properties, the proactive inspections conducted under the ordinance also led directly to the closure of five mobile home parks in 2018.

Figure 8.

**San Antonio Mobile Home Parks:
Inspection Status as of May 2019**



Under the Mobile Living Park ordinance, mobile home park owners are required to register with the City, pay an annual fee of \$35 per “useable” mobile home site on the property, and attend a mandatory training class within 30 days of license renewal. The Development Services Department began conducting inspections under the new ordinance in 2018. According to staff, the focus of the inspection program has been on life safety and health code violations, particularly those violations visible from the exterior of the mobile home units, such as electrical, plumbing, and structural issues.

As of May 2019, slightly more than half of open mobile home parks had failed their most recent inspection by DSD. Out of the 58 parks that had failed their initial inspection of 2019, 13 parks made enough corrections to pass the second inspection, 31 failed their second inspection, and an additional 14 mobile home parks were awaiting their second inspection as of May 2019.

Appendix 5 shows the locations of parks by inspection status, as of May 2019. As the inspection program continues, it will be important to assess the on-going impact, including the program's effect on mobile home park conditions as well as resident displacement via park closures and rising rents.

The Mobile Living Park ordinance contains a couple of important protections for residents when their park is closed down for health and safety conditions: The park owner is responsible for the residents' relocation costs and also required to post a \$100,000 performance bond, which the City can use to remediate the health and safety violations as well as relocate residents from the property if the owner fails to do so.¹⁹ The City may also assess any additional relocation costs it incurs to the mobile home park owner. However, according to staff, the city has not been enforcing these parts of the ordinance.

Outside of the inspections and code enforcement conducted under the Mobile Living Park ordinance, we were unable to identify any city programs being used to address the substandard conditions at mobile home parks in instances when the landlord refuses to make adequate repairs, such as when the landlord cannot afford the repairs or is intending to sell off the property for redevelopment. Programs and policies are especially needed that couple remediating substandard conditions with preserving affordable rents

and allowing the current residents to remain housed at their mobile home parks. At the five mobile home parks that closed in the first half of 2018, for example, we could not identify any attempts by the City to assist the residents or nonprofits with purchasing and improving conditions at the mobile home parks. Such actions in the future, which have been taken by other cities and states, could help preserve the city's remaining mobile homes while ensuring decent living conditions and long-term affordability. See the recommendations at the end of this report for a discussion of the policies that would help facilitate the preservation of mobile homes while also addressing safety issues.



Older mobile home in San Antonio, mid-2019.

Environmental hazards

In addition to substandard housing conditions, many mobile home park residents face a range of environmental hazards. For example, six of the city's open mobile home parks are located in the 100-year flood plain, placing the residents at risk of flooding during heavy rain events.²⁰ And roughly 10% of open mobile home parks in San Antonio are located within a half-mile radius of a permitted municipal solid waste site (active or inactive) or a Superfund site.²¹ We also observed that several mobile home parks share premises with industrial uses, which may be exposing residents to other environmental hazards such as industrial emissions. Further study of these potential exposures, such as through air monitoring, is needed. The map in Appendix 6 shows the location of mobile home parks relative to the floodplain, municipal solid waste permit sites, and Superfund sites.

Neighborhood change

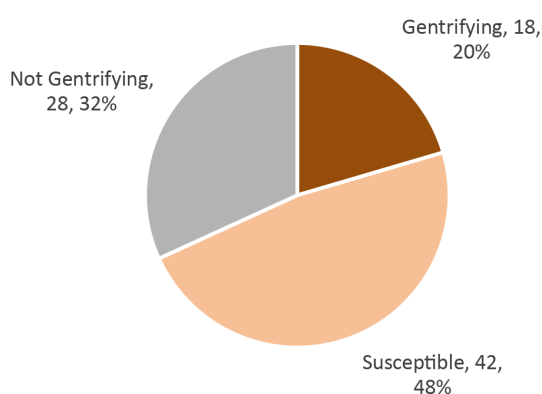
Almost three-quarters (72%) of mobile home parks in San Antonio are in census tracts undergoing gentrification or susceptible to gentrifying. In particular, utilizing the framework of the Uprooted Project at The University of Texas at Austin,²² we identified 18 mobile home parks in census tracts in the early stage of gentrifying, and 42 parks in census tracts susceptible to gentrification.²³ See Appendix 7 for locations of mobile home parks in San Antonio relative to this neighborhood change typology.

Gentrification is a process of neighborhood change where higher-income and higher-educated residents move into a historically marginalized neighborhood, housing costs rise, and the neighborhood is physically transformed through new higher-end construction and building upgrades, resulting in the displacement of vulnerable residents and changes to the neighborhood's cultural character.²⁴ Mobile home parks

in gentrifying areas and areas susceptible to gentrifying are at a heightened risk of redevelopment. Areas in the earlier stages of gentrifying are likely to see ongoing increases in property values and the loss of vulnerable persons, but also present greater opportunities for preservation interventions than areas in the later stages of gentrifying.

Figure 9.

Open San Antonio Mobile Home Parks in Gentrifying or Susceptible to Gentrifying Census Tracts



Mobile home parks on tracts larger than five acres in these areas may be particularly vulnerable, as these sites are easier to rebuild as denser residential or commercial development. Six mobile home parks in San Antonio are larger than five acres and also located in a gentrifying census tract. And another 31 parks of more than five acres are located in areas susceptible to gentrifying.

In addition to our original analysis of census tracts experiencing gentrification, we utilized research prepared by the National Association for Latino Community Asset Builders (NALCAB) in its January 2018 report “An Analysis of Housing Vulnerability in San Antonio,” prepared for the City of San Antonio’s Neighborhood and Housing Services Department.²⁵ That report utilized a slightly different methodology to identify neighborhood change in census tracts and relied on older data than the Uprooted report.

Appendix 8 shows the location of active and closed mobile home parks within San Antonio relative to census tracts with a score of 3 or 4 according to NALCAB’s methodology. These are areas that experienced the highest levels of neighborhood change from 2000-2015. Several open mobile home parks are located within or close to tracts with a score of 3 or 4.

Public redevelopment incentive programs

A variety of public subsidy and investment programs in San Antonio aim to incentivize redevelopment in certain areas of the city by providing public infrastructure, tax subsidies, fee waivers, and other subsidies. The City of San Antonio is actively engaged in at least three major types of these redevelopment incentive programs (the 2017 general obligation bond projects, tax increment finance zones, and Center City Housing Incentive Policy), all of which are geographically targeted, mainly in traditionally disinvested areas. The federal government’s Opportunity Zones provide an additional tax subsidy incentivizing redevelopment in targeted areas.

Many of the areas where the city and federal government are incentivizing redevelopment in San Antonio overlap with areas containing high concentrations of mobile home parks, placing additional redevelopment pressures on these parks. For example:

- 32% of mobile home parks (28 out of 88) are located within the bounds of at least one major redevelopment incentive program.
- 17 mobile home parks are in an Opportunity Zone.
- 9 mobile home parks are in a Tax Increment Reinvestment Zone.

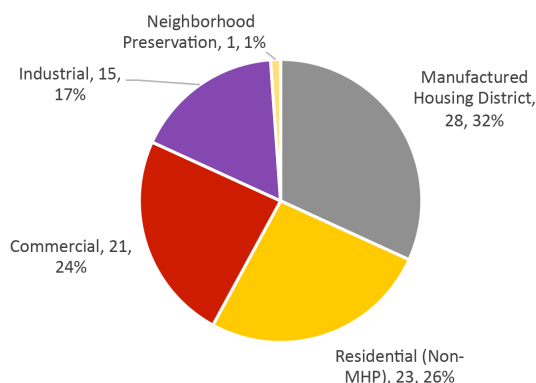
At least eleven mobile home parks are located in the Mission Reach area south of downtown, which is at the nexus of multiple redevelopment incentive programs, including bond projects, a TIRZ, a neighborhood improvement area, and an Opportunity Zone. Eight of the eleven parks in the Mission Reach area failed their most recent inspection as of May 2019, possibly as a result of the owners neglecting ongoing repairs in anticipation of redevelopment opportunities coming down the pipeline. An additional six mobile home parks that failed their last inspection are also located in other areas with redevelopment incentive programs. See Appendix 9 for a visualization of current development incentive programs relative to open and closed mobile home park locations.

Zoning and future land use

Like many other cities, the City of San Antonio has a special zoning category for mobile home parks, which prevents a mobile home park from being redeveloped for uses outside that zoning category without a zoning change. San Antonio’s zoning category for mobile home parks is called a Manufactured Housing District (MHD). While an MHD property is eligible to be rezoned for other uses, restricting the zoning of mobile home parks is still an important preservation tool, since a rezoning requires a public hearing and approval by the City Council. The residents of a mobile home park can also more easily purchase their park for preservation when it is zoned MHD, since the market value of the property is influenced by the zoning. Recognizing the linkage between a mobile home park’s zoning and preservation opportunities, the City of Austin, for example, recently downzoned many mobile home parks in the city that were zoned under more intensive zoning categories. The parks are now

Figure 10.

Zoning Status of Open Mobile Home Parks in San Antonio, 2019



rezoned appropriately under the City of Austin’s mobile home park zoning category.

Despite having an MHD zoning category in San Antonio, close to two-thirds of the city’s mobile home parks are not zoned as an MHD. The lack of MHD zoning leaves these parks more vulnerable to redevelopment for other uses, especially those parks zoned for more intensive uses and located in areas experiencing redevelopment pressures. For example, four of the remaining mobile home parks in the Mission Reach area are zoned as commercial instead of MHD; at least two parks that were not zoned as MHD have already been lost to redevelopment in the area since the Mission Trails Mobile Home Park rezoning case.

Another issue affecting the preservation of mobile home parks in San Antonio is that the city’s Manufactured Housing District (MHD) designation also allows—by right—any and all uses permitted under the “R-4” residential zoning class. The R-4 zoning type includes a variety of housing types, as well as ancillary uses such as parks, schools, and churches. Thus, a mobile home park zoned MHD could theoretically be redeveloped into four single-family homes with no zoning change needed.²⁶

The city’s zoning notification process also continues to be an issue with promoting the preservation of mobile home parks, as was brought to light in the rezoning case for Mission Trails Mobile Home Park, where residents were not notified of the zoning case until quite late in the process. One of the recommendations from the Mayor’s Task Force on Preserving Dynamic and Diverse Neighborhoods in 2015 was for the City to revise its rezoning process to ensure that all people living within 200 feet of the site up for rezoning, including renters, receive notice of the requested zoning change. This change has still not been implemented according to the staff we spoke to at the City.

Another threat to mobile home parks in San Antonio is the future land use designation for many of the city’s parks. The future land use is the designation that the city assigns an area to designate its future uses in accordance with a city’s comprehensive plan. The future land use designated for an area does not necessarily mean a parcel will be used for the identified uses, but it does influence zoning and other land use and development decisions impacting a tract. When the current zoning is incompatible with future land use, a zoning change is still required in order to use the property for the purpose outlined by the future land use classification.

Roughly half of mobile home parks in San Antonio have a designated future land use, and of those with a future land use, 30% have a land use more intensive than a Manufactured Housing District. Of particular note are the cluster of four mobile home parks located in the Mission Reach area that have a future land use of Mixed Use or Community Commercial, contributing to the sites’ vulnerability for redevelopment.

10 Policies for Preserving San Antonio’s Mobile Home Parks

We present here ten local policies that would improve the preservation of San Antonio’s mobile home parks, drawing from best practices in Texas and other parts of the United States. These policies would improve the living conditions and housing stability of thousands of mobile home park residents in San Antonio.

1. Adopt zoning and future land use protections for mobile home parks and residents.

Recommended actions:

- Rezone San Antonio’s 60 mobile home parks that are not currently zoned as Manufactured Housing Districts, so that these parks receive the protection of a Manufactured Housing District.
- Reform the City’s zoning notification process so that mobile home park residents receive notice of the proposed zoning change and public hearing process, as recommended by the Mayor’s Task Force on Preserving Dynamic and Diverse Neighborhoods in 2015.

- Update the City's future land use maps to ensure that the future uses designated at mobile home park sites aligns with the sites' current use as a mobile home park.

Background: These land use policy changes are the most effective and low-cost regulatory solutions that the City can adopt to restrict the redevelopment of mobile home parks. As discussed earlier in the report, 68% of the city's 88 mobile home parks are not protected under the City's Manufactured Housing District (MHD) zoning. Rezoning these mobile home parks to the City's MHD zoning category would legally restrict these properties to only the uses allowed in MHDs. The property owner would have to secure a zoning change from the City Council to redevelop the property as a different use, such as a condominium complex or a commercial center. For those mobile home parks that are zoned MHD, residents still do not have the right to receive notice of zoning changes proposed at their mobile home park, even though this policy reform was recommended in 2015 by the Mayor's Task Force on Preserving Dynamic and Diverse Neighborhoods in response to the Mission Trails Mobile Home Park rezoning case. Finally, San Antonio's future land use maps need to be updated to better protect mobile home parks, since the future uses at approximately 13 mobile home park sites currently call for more intensive land uses, such as mixed-use development.

Examples: [Austin, Texas](#) (16 mobile home parks rezoned as a Mobile Home Residence District in 2019); [Portland, Oregon](#) (56 mobile home parks rezoned as Manufactured Dwelling Park uses); Kenmore, Washington (all 6 of the city's mobile home parks rezoned as Manufactured Housing Communities).

2. Provide residents with a right to purchase their mobile home parks.

Recommended Action: Adopt a city ordinance providing mobile home park residents with a right to purchase their park when it is sold or redeveloped.

Background: Around the country, many low-income residents have successfully purchased their mobile home parks, providing a long-term source of stable affordable housing. A key policy for supporting resident purchases is a right-to-purchase option, which is triggered by certain events, such as when the park owner attempts to sell the property, issues a notice to vacate for a demolition or discontinuance of the park, or files a re-zoning request. Best practices in a right-to-purchase ordinance include:

- Owner is required to notify residents before listing the property for sale;
- Owner is required to provide a copy of any purchase offers to the residents;
- Residents have 60-90 days to accept the offered price or provide a counter offer;
- Residents have an additional 60-90 days to secure financing.

Examples: [San Diego](#) (45-day right of first refusal); Stacy, Minnesota (180-day notice); Connecticut (120-day notice and right of first refusal); Florida (45-day notice and right of first refusal); Minnesota (45-day notice and right of first refusal).

3. Require relocation notice and a relocation plan for mobile home park conversions.

Recommended Action: Adopt a city ordinance requiring a mobile home park owner to (1) provide residents with 275-day notice before converting or otherwise voluntarily closing down a mobile home park and (2) create a city-approved relocation plan before the closure takes place.

Background: The relocation notice and relocation plan requirements could be triggered when a site plan is filed with the city, a zoning change request is submitted, or when large-scale notices to vacate or lease non-renewals are issued by the owner in conjunction with the closure of the park. An effective relocation plan includes:

- Information on each tenant (name, address, household income, monthly costs, debts) and mobile home (condition, size, ownership status, etc.);
- Copies of all lease agreements;
- An inventory of relocation resources and available mobile home spaces in the city;
- Actions the owner will take to refer tenants to alternative public and private subsidized housing resources;
- Actions the owner will take to help tenants move their mobile homes;
- Other actions the owner will take to minimize the hardship of relocating households;
- Designation of a relocation coordinator to administer the relocation plan;
- A public hearing requirement with direct notification to the residents.

Examples: [Austin, Texas](#) (270-day notice required); [San Diego, California](#) (relocation plan required); [Kent, Washington](#) (relocation plan and 12-month eviction notice required); Pomona, California (relocation plan required; [see example](#)); + [examples](#) from many states.

4. Enhance protections for resident organizing and education.

Recommended Action: Adopt a city ordinance providing mobile home park residents and invited tenant organizers and tenant education organizations with the right to participate in outreach and educational activities at mobile home parks.

Background: Several states and cities have passed laws that protect tenant organizing and outreach activities at mobile home parks and apartment complexes, supporting residents' ability to form tenant associations, advocate collectively for improvements to their property, and participate in acquisition opportunities. In Texas, mobile home park residents have the right to meet on the property without interference from their landlord but otherwise do not have the right to participate in outreach activities at the property, such as door-to-door canvassing to form a residents association or discuss issues at the property. Invited tenant organizers also do not have the right to support residents on the property in organizing activities and face arrest for participating in such activities. Best practices for an ordinance include:

- Providing tenants and invited organizers with a right to conduct door-to-door surveys of tenants to ascertain interest in establishing a tenant organization and to offer information about tenant organizations and educational events; and
- Prohibiting owners from interfering with tenants and tenant organizers conducting activities related to the operation of a tenant organization.

Examples: [Seattle, Washington](#); Suffolk County; [Washington, D.C.](#) (Tenant Right to Organize Act); [East Palo Alto, California](#) (Tenants' Right to Organize ordinance).

5. Create a local fund to support tenant acquisitions of mobile home parks.

Recommendation Action: Create a working group of public and private stakeholders to identify sources of funding and the best place to house a local fund dedicated to supporting resident mobile home park acquisitions along with infrastructure improvements and capacity building support for the residents.

Background: Community development financial institutions, such as ROC USA, offer financing for tenant acquisition of mobile home parks, but oftentimes grant support is also needed to help cover the

purchase price, infrastructure improvements needed at the property, and on-going capacity building support for the residents. Funding sources for a fund could include local and national foundations, the San Antonio Housing Trust's revenue from development projects, general obligation bond funds (for the infrastructure), Community Development Block Grant funds, and general revenue. Tax Increment Reinvestment Zone (TIRZ) funds could also help cover infrastructure improvements at mobile home parks in an area where there is a TIRZ.

6. Provide home repair assistance to mobile home park residents.

Recommended Action: Expand the City of San Antonio's home repair programs to cover mobile homes and identify additional sources of funding to support mobile home repairs.

Background: None of San Antonio's home repair programs are available to mobile home owners. The City's Minor Repair program, the Green and Healthy Homes program, and the Owner-Occupied Rehabilitation program are off limits to mobile home owners. Yet, many mobile homes in the city are very old and continue to deteriorate rapidly, and many mobile home residents—whose median family income for the region is only \$36,000—lack the financing and the resources to repair their homes. And oftentimes residents are fined or face eviction because the community rules or lease requires them to maintain their homes, which families on limited incomes cannot afford. The only home repair assistance program in the city that we could identify for mobile home residents is a weatherization assistance program provided by the Alamo Area Coalition of Governments.

7. Create a mobile home preservation network.

Recommended Action: Create a local working group to monitor at-risk mobile home parks and coordinate proactive interventions to save vulnerable parks.

Background: Preservation networks bring key stakeholders together on a regular basis to monitor at-risk mobile home parks, engage with property owners, and collaborate on proactive preservation strategies. Suggested best practices for a preservation network include:

- Creating and actively updating a database of at-risk mobile home parks with detailed information on code violations, zoning status, and other indicators of vulnerability (the report authors have started such a database);
- Holding regular meetings where participants discuss the at-risk mobile home park inventory and develop strategies for preserving the highest priority properties.
- Develop an early warning system with proactive preservation interventions for mobile home parks that have failed city code inspections and are continuing to deteriorate.

Examples: Washington, D.C. ([DC Preservation Network](#)); Colorado ([Housing Preservation Network](#)); Massachusetts ([Community Economic Development Assistance Corporation](#)—Interagency Working Group and Preservation Advisory Committee); Chicago/Cooke County, IL ([Preservation Compact](#)).

8. Create a mobile home park preservation officer position.

Recommended Action: Create a mobile home park preservation officer position within the City of San Antonio to oversee and coordinate mobile home park preservation policies and programs.

Background: A mobile home park preservation officer would be a city employee tasked with overseeing and coordinating the city's policies and programs related to the preservation of mobile

home parks, including: (1) implementing a citywide preservation policy, (2) coordinating a preservation network, (3) coordinating preservation interventions, (4) matching mobile home parks owners with preservation-minded buyers, and (5) working with tenants to ensure they are notified and aware of their rights and preservation options. The officer could also oversee the enforcement of any requirements for mobile home relocation plans (see above).

9. Adopt preservation plans for vulnerable areas receiving public redevelopment incentives.

Recommended Action: Adopt preservation plans, with concrete goals and implementation timelines, for areas in San Antonio with public redevelopment incentives and a concentration of vulnerable persons including mobile home parks.

Background: In order to ensure that public redevelopment incentives do not facilitate the displacement of vulnerable households, including mobile home residents, it is critical that equitable preservation policies be built into these programs when they are adopted or updated, rather than reacting to displacement after projects are already underway. Ideally a community-driven, neighborhood-scale plan would be developed for each vulnerable area that is being targeted for redevelopment through public incentives, such as Tax Increment Reinvestment Zones, Opportunity Zones, and the funding of major public infrastructure projects. The plan should incorporate the voices of vulnerable residents and set forth clear timelines for implementation. A community oversight committee, which meets regularly to review the outcomes of the plan, provides for greater transparency and accountability in the implementation of the plan.

Examples: [Portland's North/Northwest Neighborhood Housing Strategy](#); [Guadalupe Community Development Project Plan](#)

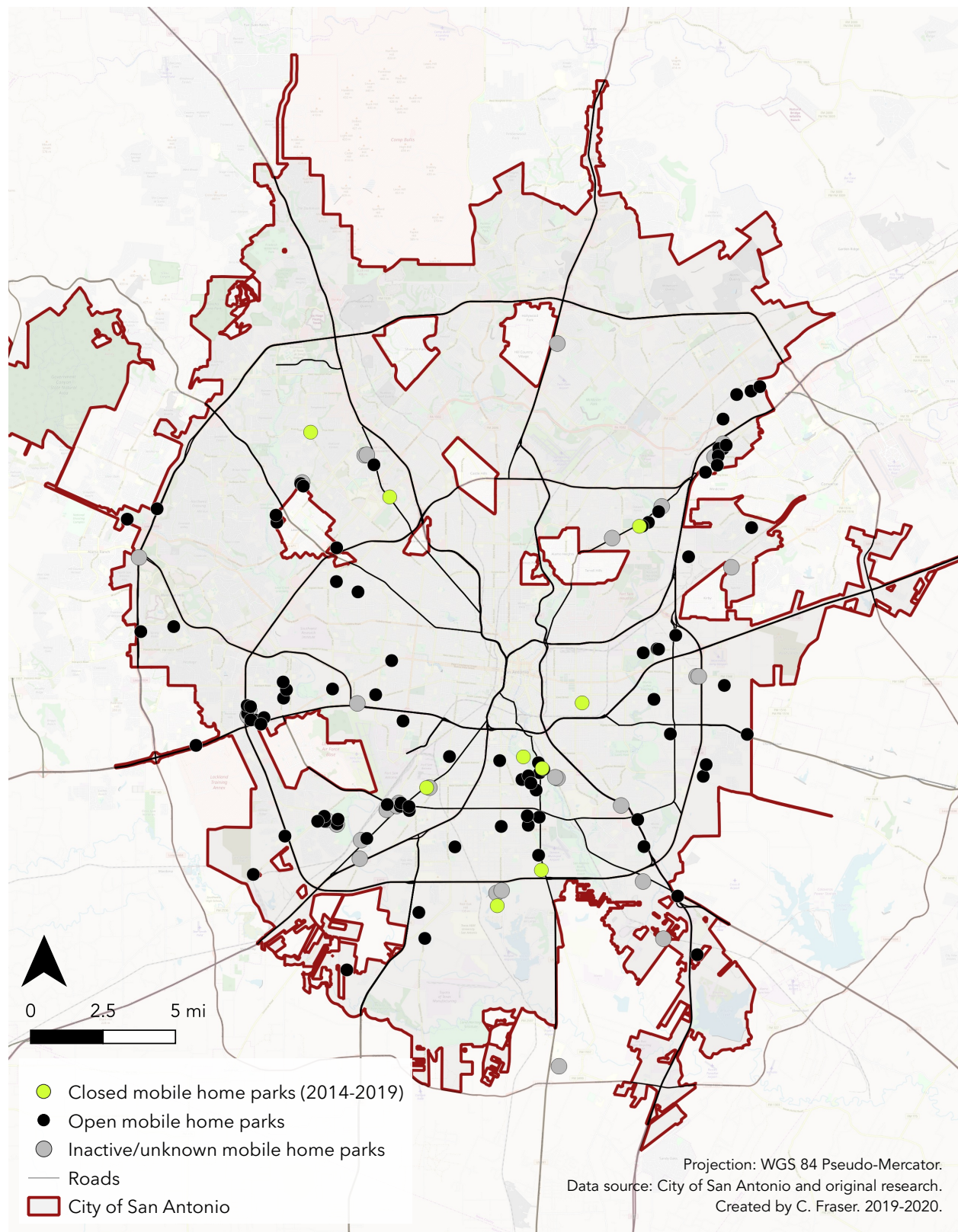
10. Enforce the Mobile Living Park ordinance's bond and relocation costs requirements.

Recommended Action: Enforce the bond and relocation requirements under Section 18-11(5) of the City Code when a park is shut down for health and safety conditions.

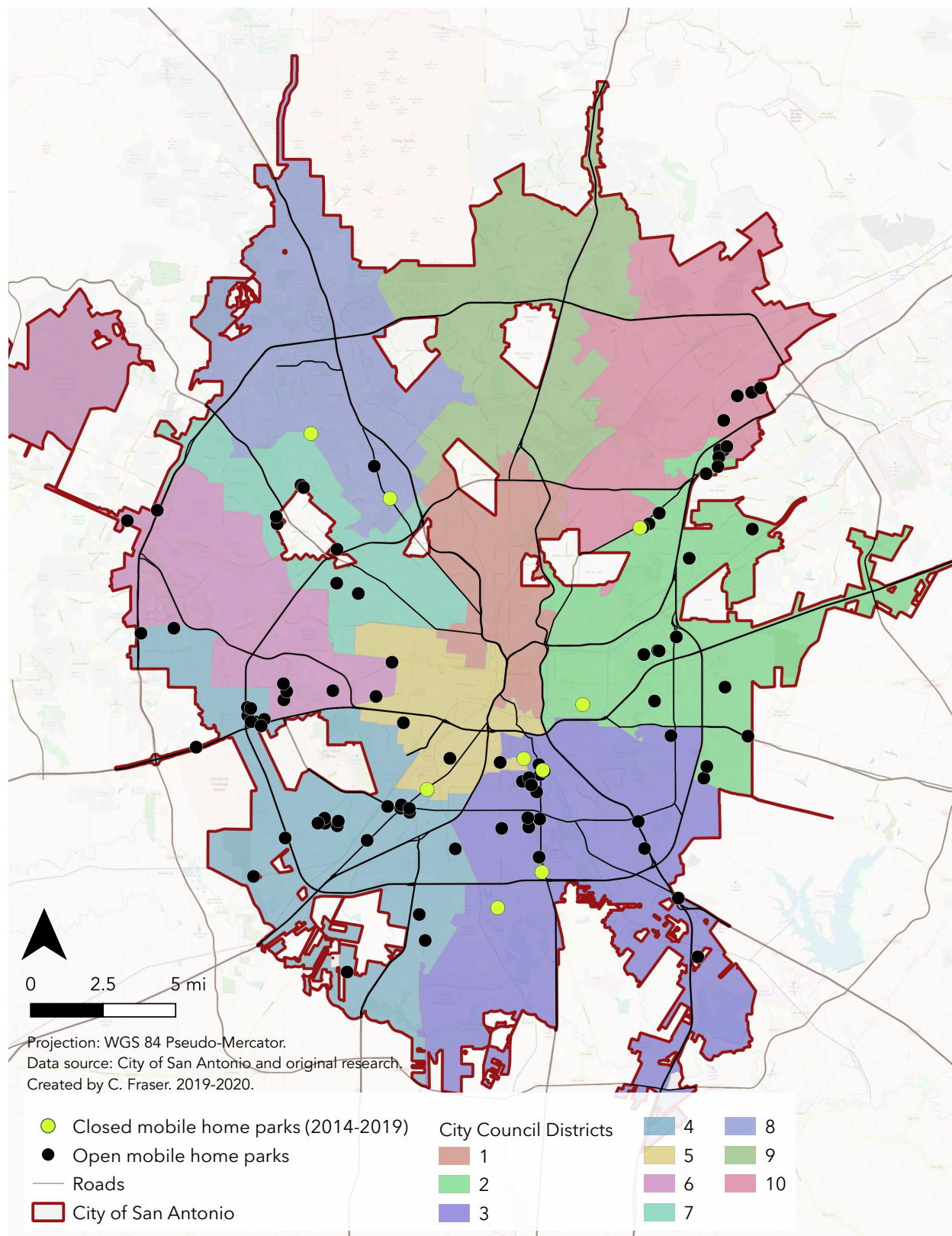
Background: Since 2014, at least seven mobile home parks were closed as a result of the city's code enforcement actions, due to the extreme safety and health code violations present at these parks. Under Section 18-11(5) of the City Code, which is part of the City's Mobile Living Park ordinance, the park owner is responsible for covering the displaced residents' moving costs and related expenses and also required to post a \$100,000 performance bond, payable to the city, for the costs to remediate and cure the nuisance conditions as well as to move the affected tenants at the property. According to staff, the park owners were not required to post this bond or cover the residents' relocation costs at any of the seven closed properties. Enforcing the bond allows the city to shift the burden of paying for relocation costs to the park owner who was responsible for the substandard conditions at the property. Ideally, this bond amount would also be increased in the ordinance for larger mobile home parks, so that there are sufficient funds available to cover the city's costs in the event that a large number of tenants are displaced and the owner fails to cover the costs.

Appendices

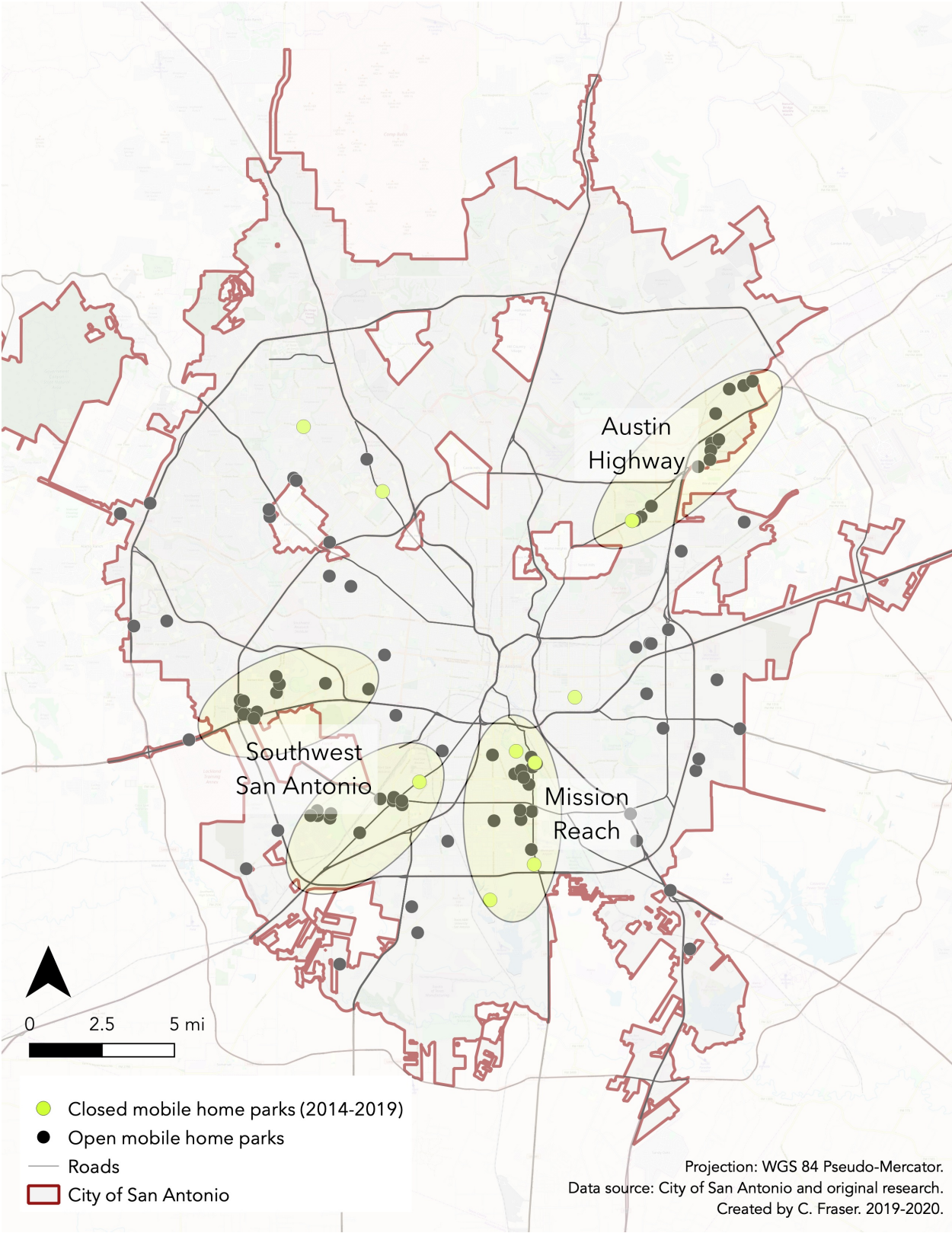
Appendix 1: Mobile Home Parks in San Antonio



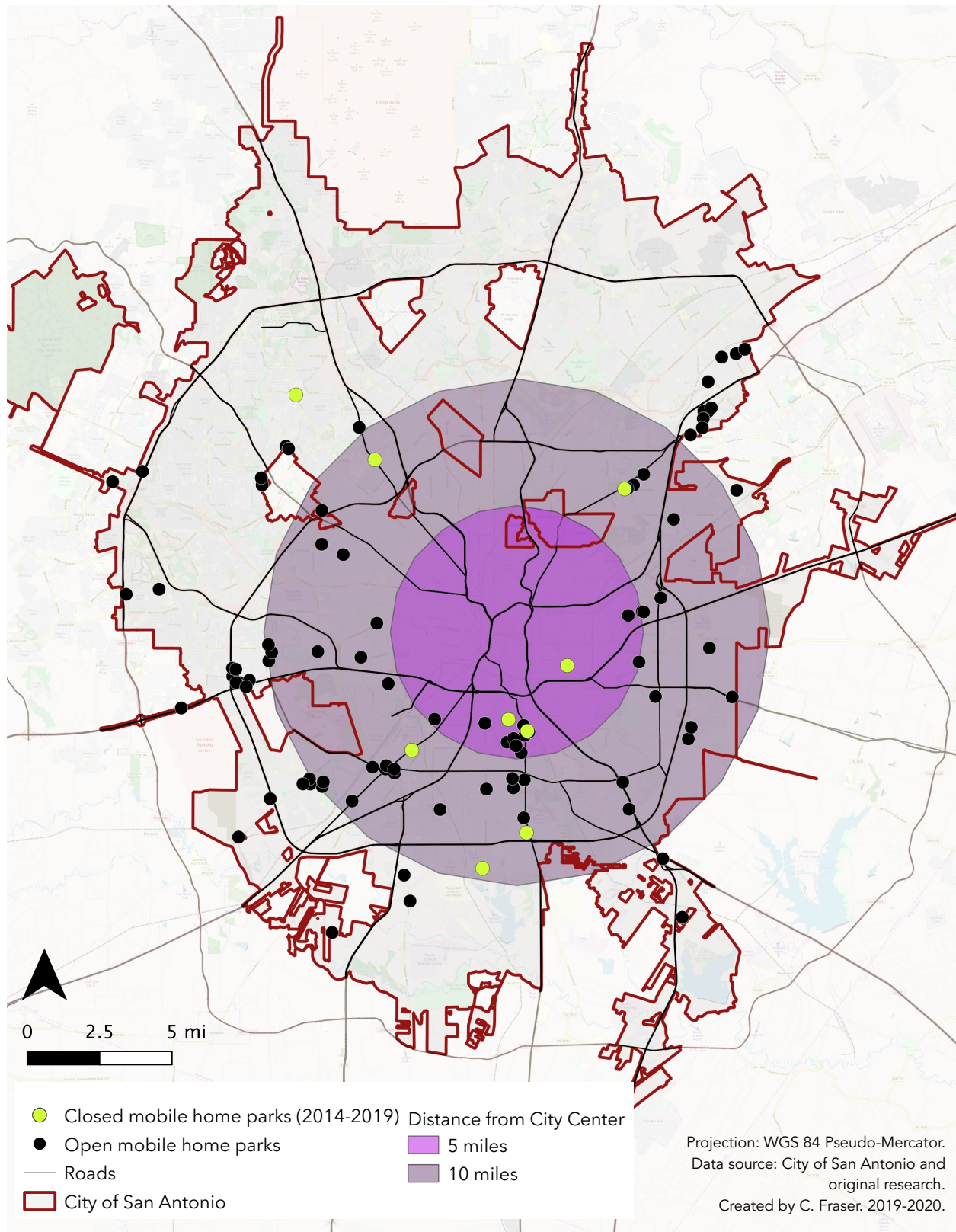
Appendix 2: Mobile Home Parks and San Antonio City Council Districts



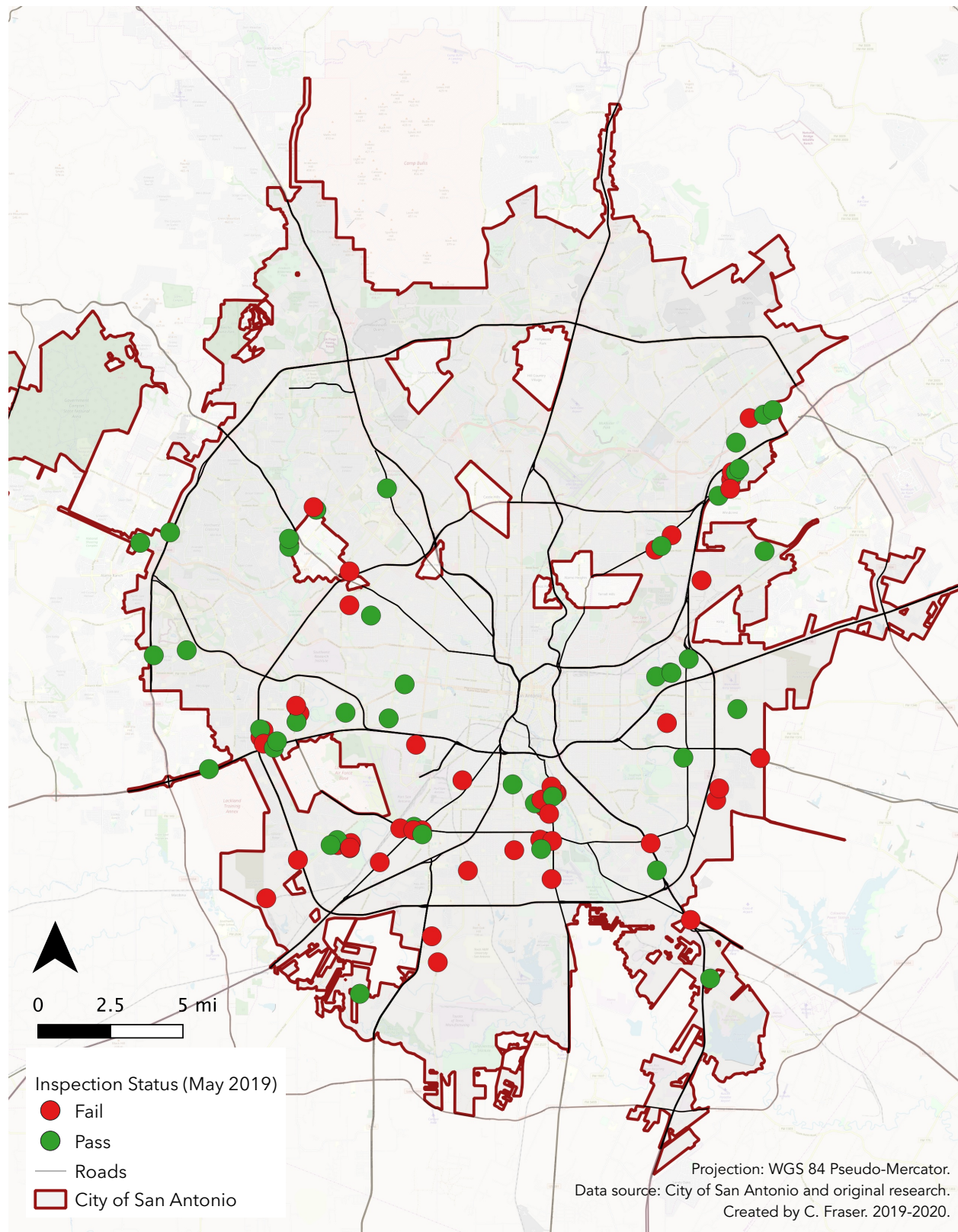
Appendix 3: Mobile Home Park Clusters in San Antonio, TX



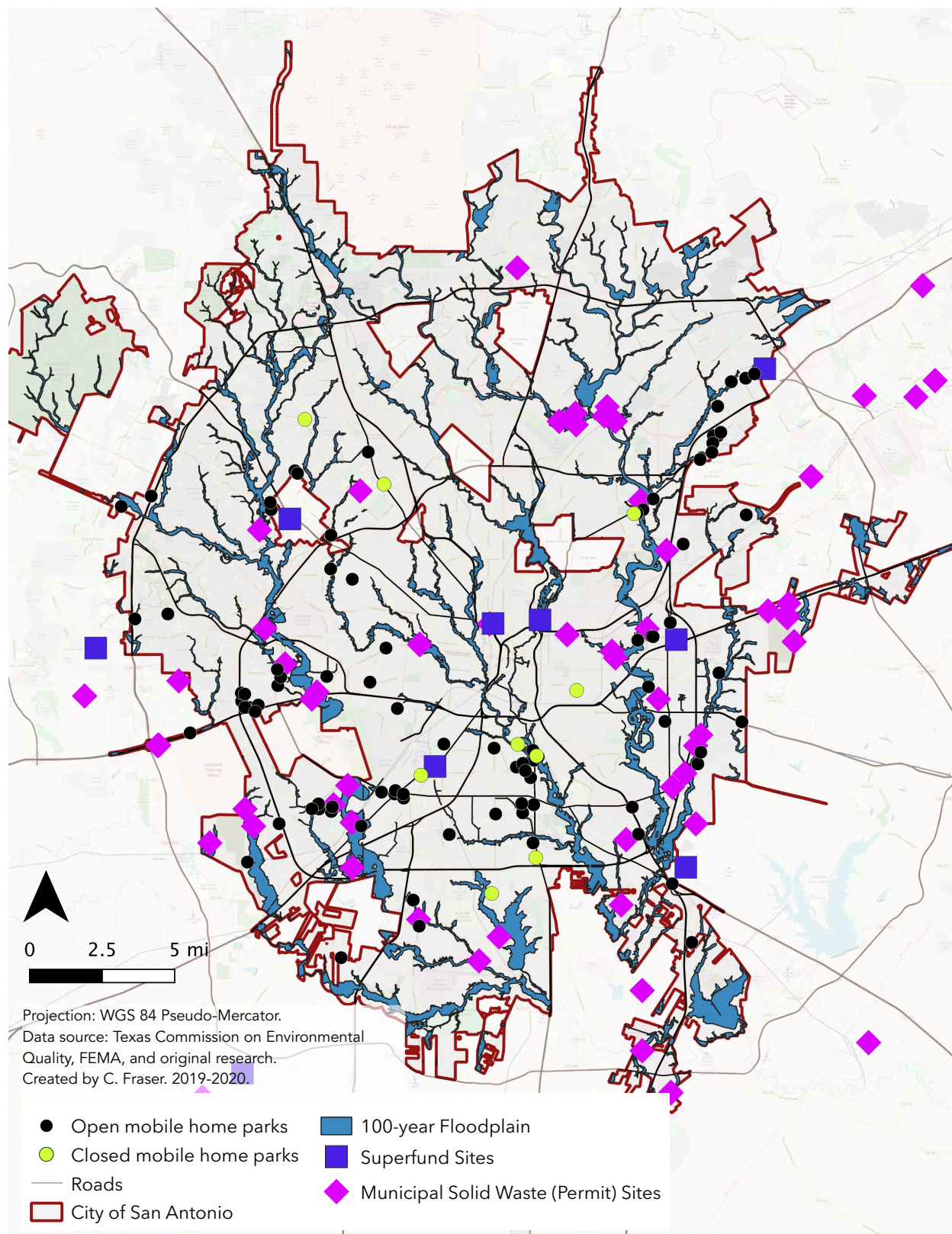
Appendix 4: Mobile Home Parks in San Antonio's Urban Core



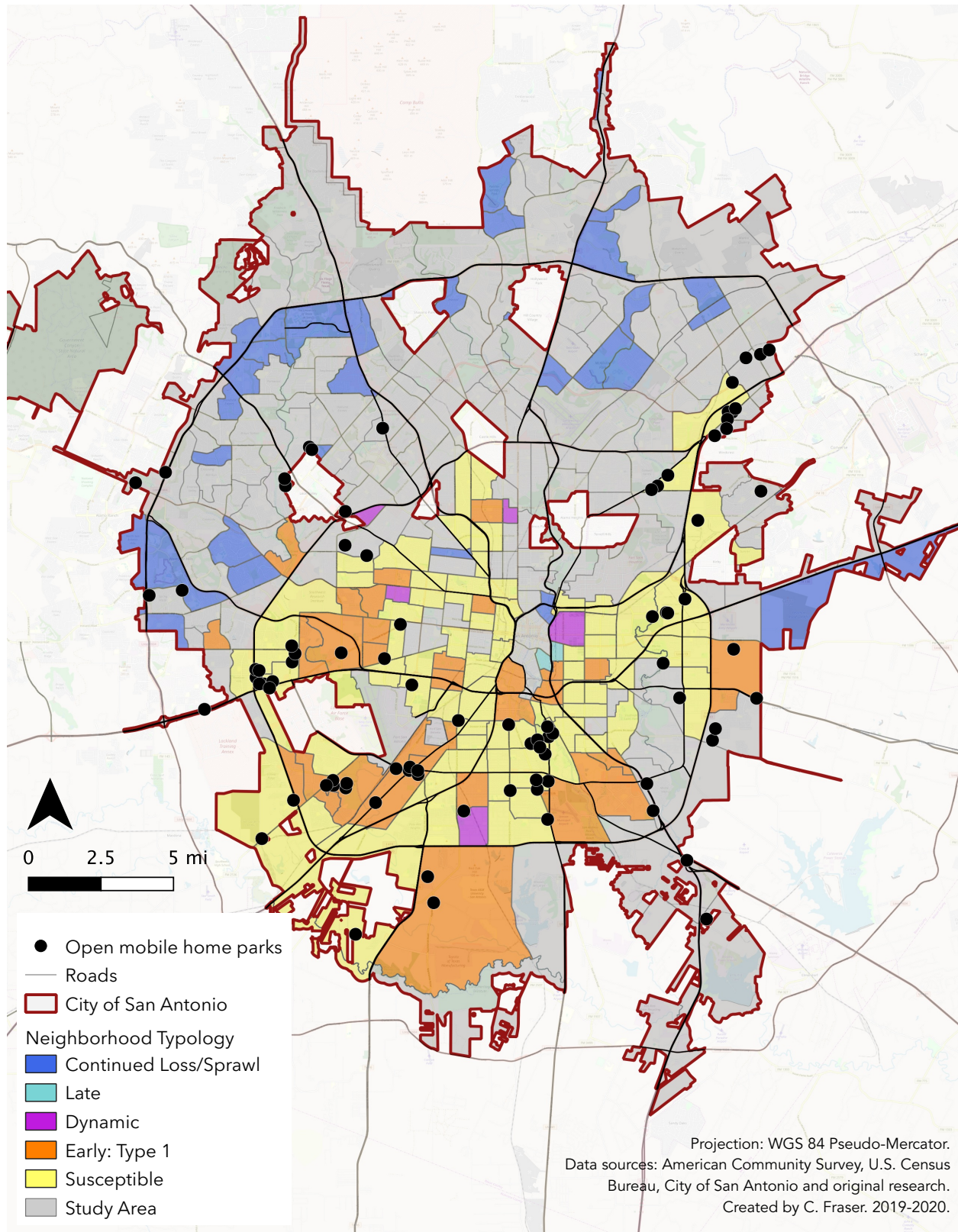
Appendix 5: Inspection Status of Mobile Home Parks (May 2019)



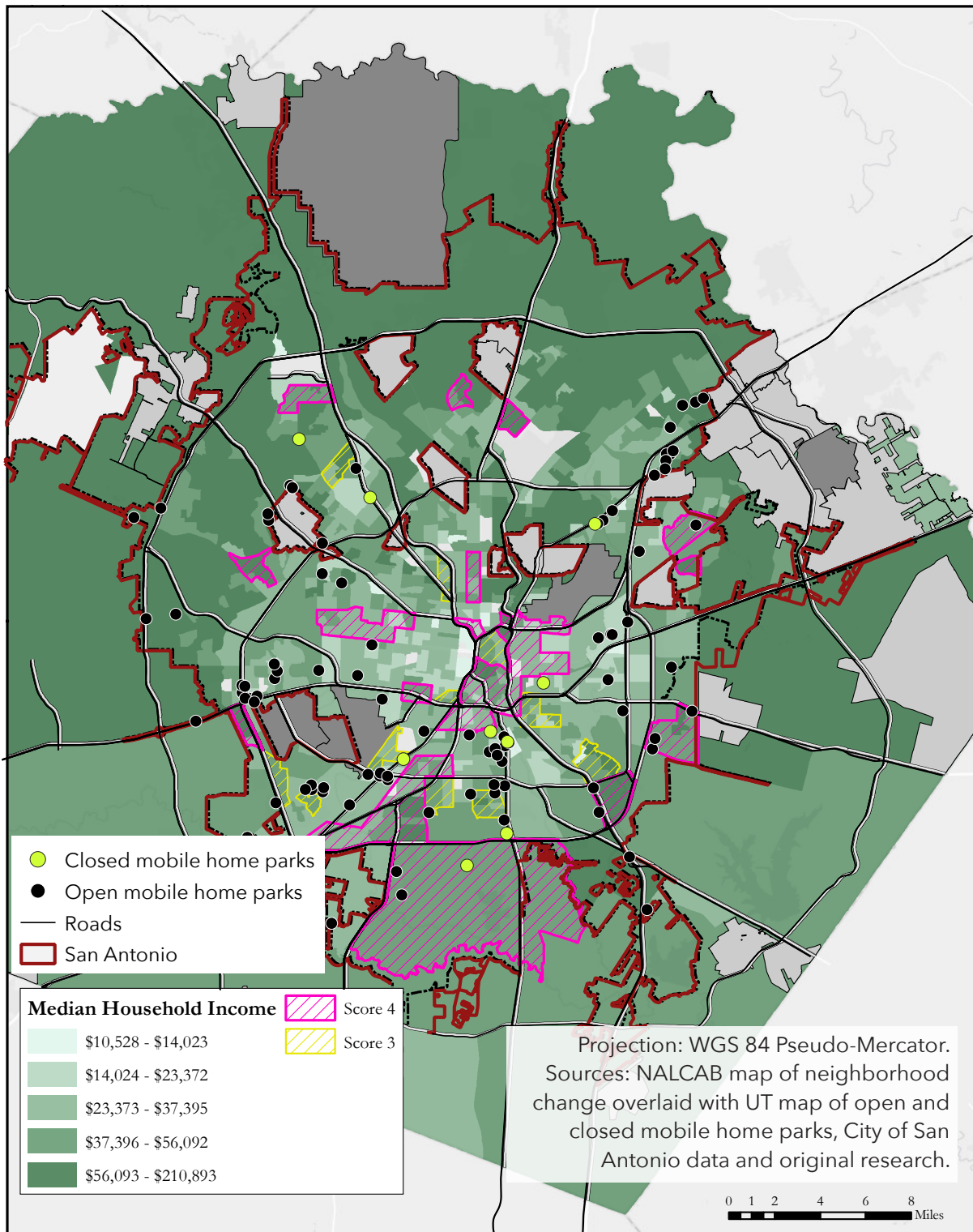
Appendix 6: Mobile Home Parks and Environmental Hazards



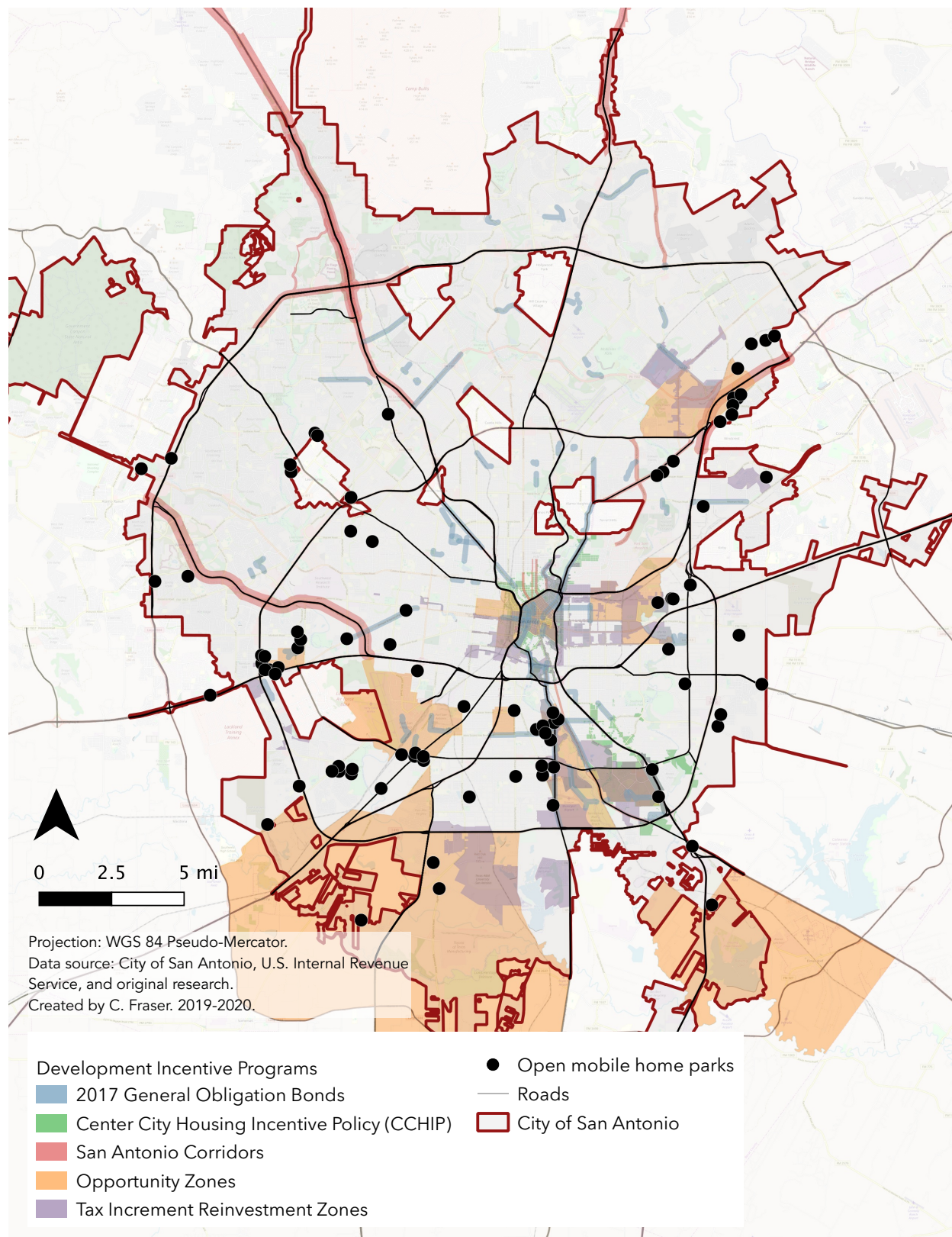
Appendix 7: Mobile Home Parks and Neighborhood Change Typology



Appendix 8: NALCAB Methodology



Appendix 9: Mobile Home Parks and Development Incentive Programs



Appendix 10. Mobile Home Park Closures in San Antonio Since 2014

The following is a summary of the nine mobile home park closures that have occurred in San Antonio since 2014.

2014-2017 Mobile Home Park Closures

Mission Trails Mobile Home Park: 2014-15

The closure of the Mission Trails Mobile Home Park over the course of 2014 and 2015 is well documented by local media, the Mayor's Task Force on Preserving Dynamic and Diverse Neighborhoods, and the Vecinos de Mission Trails report released in 2017 (Cortez, Marisol. "Making Displacement Visible: A Case Study Analysis of the 'Mission Trail of Tears'", May 2, 2017). Located at 1515 Mission Road, Mission Trails was a centrally located and very large (21 acres) mobile home community. Located in the rapidly changing area of Mission Reach, a target of multiple public investment projects in recent years, Mission Trails was particularly vulnerable to closure and redevelopment. Nearby investments include the Mission Reach Improvement Project, a \$245 million restoration of the San Antonio river, as well as the UNESCO World Heritage Designation of the San Antonio Missions and the Central City Housing Incentive Program (CCHIP). CCHIP funding of \$1.7 million was used to subsidize the development of a 300-unit luxury housing development at the site.

Residents were given little warning of the zoning change sought in early 2014 by the Mission Trails' owner, American Family Communities (a major player in the national mobile home park industry). Beyond a sign posted on the outside of the property, residents were not individually notified of the zoning change hearing. San Antonio's zoning notification process does not require renters to be informed of zoning change requests. Changing this process was a recommendation of the Mayor's Taskforce. American Family Communities requested that the zoning change in anticipation of selling the property to White-Conlee Builders, which planned to build a \$75 million mixed-used development at the site with luxury apartments and shops. While the zoning changes and sale were pending, Mission Trails' owners let the mobile home park's infrastructure continue to deteriorate. Residents complained of lack of upkeep, standing pools of water after storms, the smell of leaking sewage, and abandoned and deteriorating units.

The requested zoning change was approved by the City Council 2014. After the transfer of ownership, residents' leases were not renewed, and the remaining residents were required to leave. Some of the residents who owned their units were offered relocation assistance to leave quickly and move to other parks, although research by the Vecinos de Mission Trails suggests that the actual assistance provided was much less than originally promised. For many of the residents who were on month-to-month contracts or did not own their mobile homes, the amount of relocation assistance they were offered was significantly less, which became another point of controversy and hardship. Additionally, the City of San Antonio did not provide direct financial relocation assistance to the residents, although the city did provide information about affordable housing resources more generally.

Oak Hollow Mobile Home Park: 2016

The Oak Hollow Mobile Home Park was a large mobile home park on 7.8 acres in the northern part of the city. The City investigated Oak Hollow in 2016, after the residents brought to the City's attention major sewage leakage problems at the property. The City ordered a dozen families to vacate, closing one section of the mobile home park. The City subsequently found more septic tank leaks, and the owner was required to either fix the issues or close the park. The owner chose to close the park, forcing out the remaining residents.

The City of San Antonio allegedly provided up to \$4,500 of relocation assistance for each household via funds from the City's Fair Housing program. There is no indication that the City of San Antonio offered the residents any other option other than leaving the park, such as assisting the residents with the repairs and purchase of the property, which would have allowed them to stay in place.

The former mobile home park is zoned C-2 Commercial District, and the future land use is “Mixed Use Center,” meaning it can accommodate a dense mix of businesses and residences. Currently the property sits vacant, ready for redevelopment, with an appraised value of \$1.3 million (compared to \$877,000 in 2015, when it was still a mobile home park), according to Bexar Central Appraisal District.

Plaza Mobile Home Park: 2016

The Plaza Mobile Home Park, at 811 Corinne Drive, was a large mobile home park in northeast San Antonio. The former mobile home park site is located along the Austin Highway, a road selected by the City for transit improvements as part of the San Antonio Corridors program.

Residents of Plaza MHP began experiencing a loss of water service in March 2016, when the San Antonio Water Service shut off water to the property due to thousands of dollars of outstanding bills owed by the owner, Joseph Sandoval. In June 2016, the City issued a Notice to Vacate order due to the lack of water, and thereafter pursued charges against the owner.

According to news reports, the City’s Neighborhood Housing Services Department worked directly with residents to find new places to relocate to once the City shut the property down. There is no evidence that the City offered to work with the residents to reinstate water service, help them make repairs, or otherwise improve the property.

Since being vacated, the property has doubled in value and is now worth almost \$1 million, according to Bexar Central Appraisal District. The site is being redeveloped as an 18,000 square foot commercial property (an auto-body shop) by the Cross Development Corporation, which bought the property in 2018.

2018-2019 Mobile Home Park Closures

Vails Mobile Home Park: 2018

Vails Mobile Home Park, at 540 New Laredo Highway, was a small (four-unit) mobile home park in southwest San Antonio, within the urban core. The land where the park was located is zoned as a Manufactured Housing District (the City’s zoning for mobile home parks). However, its future land use is “Mixed Use,” indicating a zoning change for this property could probably be obtained relatively easily, particularly now that the tract is vacant. The lot is located in a census tract undergoing gentrification, and the appraised value of the property has more than doubled since 2015.

The City issued a notice to vacate in February 2018 after finding that the property had no water service and was using electricity without a permit. By February 22, 2018, the City’s notes confirmed that all residents had voluntarily left the park, and by early March the tract was vacant, the grass was cut, and the park was “cleaned and secure.” In August 2018, the property was sold to Mobile Homes Capital 1 LLC, who told DSD that they purchased the property “with intent to fix property maintenance issues and reopen the park.” The City required the new owners to guarantee that prior violations would be addressed before re-opening the park, with proper permits pulled, work performed by licensed contractors, and a final inspection by DSD.

Smith-Gevers Mobile Home Park: 2018

Smith-Gevers Mobile Home Park, located at 133 Vine Street (or, alternatively, 1001 Gevers Street), was a mobile home park on the eastside of San Antonio. The City issued a notice to vacate for the park in February 2018, after finding exposed electrical conductors, illegal electrical installation, illegal use of extension cords, broken sewer connections, and unsafe egress. Eight households lived on the site, with a total of 15 residents. The owners indicated they were going to make repairs while residents relocated. By March, no repairs had been made, and a new sewage leak was found. The inspectors noted that “the improvements required to bring into compliance are more extensive than initially thought” and that the Department of Neighborhood and Housing Services was offering housing relocation assistance to the remaining residents on the property. According to the inspectors’ notes, the City secured assistance to at least one of the displaced residents to cover first month’s rent at another property. By May 2018, the utilities were shut off and all the residents had moved out.

Smith-Gevers was located in a census tract currently experiencing gentrification. Shortly after being vacated, the property was sold twice within two months, first to MAG Real Estate Services, and then to the Henneke Financial Group. While the property is currently a vacant lot, as of February 2019 it was zoned as an Infill Development Zone, just like Mission Trails and the Rolling Home Trailer Courts (also known as the Park at Lone Star). The future land use for the site is “Mixed Use.” The market value of the land has tripled since 2015.

1111 Herbst Street: 2018

The closed mobile home park at 1111 Herbst Street did not have a formal name and was located in South San Antonio, near the Mission Reach area, on a semi-dirt road, surrounded by fields. The park is in an area susceptible to gentrification pressures, and very near the Stinson Airport area, which is undergoing redevelopment. The mobile home park was closed in early 2018 during the first round of mobile home park inspections after the passage of Mobile Living ordinance. The property remains vacant. While city staff attempted to assist the owners with pulling permits and making repairs, the owners made little progress, leading to the city’s closure of the property.

The City issued a notice to vacate in February 2018. The city inspection notes report that there were six mobile home sites along with two permanent buildings subdivided into seven apartments on the site, including one unit that was “unsecured.” The inspector-identified issues included sewage discharge, broken pipes, and electrical splicing and boot legging. By February 21, 2018, all residents including the owner and her family had left the property. The city inspectors noted that between 14 and 17 residents needed relocation assistance; it’s unclear how many ended up receiving assistance from the City.

Hurley Rental Park: 2018

Hurley Rental Park at 11033 Pleasanton was a mobile home park in South San Antonio, near the Mission Reach area and two other now-inactive mobile home parks (Wolf’s Wetlands Rental and Trailer City South) and one other closed park (1111 Herbst Street). The site was initially inspected by the City in February 2018, when inspectors found raw sewage on the ground and other related plumbing issues. As of May 2019, legal action was still pending against the park owner. We could not find any record of the displaced residents receiving relocation assistance from the City.

The former mobile home park site is still zoned as a Manufactured Housing District (MHP) and does not have a future land use designation. Increased public or private investment could come to the area within the next few years, as the site is located in a federal Opportunity Zone. The appraised value of the parcel has almost tripled in the past five years. The property is now owned by the same entity that owns 540 New Laredo Highway, the site of another closed mobile home park.

7912 Fredericksburg Road #3: 2018

The closed mobile home park at 7912 Fredericksburg Road #3, located in the northern part of San Antonio near Oak Hollow Mobile Home Park, did not have a formal name. In February 2018, the City issued a notice to vacate to the residents under the new Mobile Living Park ordinance and inspection program. The city inspection notes state that the park was an “unlicensed/illegal RV park” where the “sewer was not connected,” with raw sewage as well as electrical meter tampering. The five RVs on the property (only one was occupied), sewer lines, and electrical lines were all removed within five days of the notice to vacate, and the City noted “issue resolved” when re-inspecting the property in May 2018. It is unclear what happened to the residents of the single occupied trailer on the property, such as whether they received city assistance with relocating. The site is now a car wash.

George’s Mobile Trailer Park: 2019

George’s Mobile Trailer Park, located in the rapidly gentrifying Mission Reach area, is the most recent mobile home park closure we identified. The property, which is along the San Antonio River, closed quietly sometime between May and December 2019, after being purchased by a local developer. The 1.51-acre property’s location is a hotbed for redevelopment activity, about a mile from the Mission Trails Mobile Home Park redevelopment site and within a federal Opportunity Zone. The property is zoned for commercial development and targeted for mixed-use development on the city’s future land use maps. The park failed the city’s two inspections under the Mobile Living Park ordinance in 2019. The mobile home park is located adjacent to another smaller mobile home park, Riverside Trailer Court, where residents have expressed concerns of being displaced similar to their neighbors.

Endnotes

- 1 Mayor's Task Force on Preserving Dynamic and Diverse Neighborhoods, <https://www.sanantonio.gov/Planning/DynamicDiverseNeighborhoods>.
- 2 American Community Survey, 2017 5-year estimates. Table B25033 and Table DP04.
- 3 The City of San Antonio's Development Services Department provided us with a list of 133 registered mobile home parks in the Summer 2019. Nine of these parks are now closed, 32 are vacant or not actually mobile home parks (i.e. they are private family compounds with just a few mobile homes on them or are being used for other purposes), and 3 sites were duplicate addresses of other parks. After accounting for these factors, we concluded that, as of May 2019, there were 89 actively inhabited unique mobile home parks in San Antonio, which we refer to in this report as "open" mobile home parks. This remains an estimate, however, since the City's list also includes sites with "unknown status." It's possible that some of these sites could actually be operational mobile home parks. The most notable example is the San Pedro Mobile Home Park, which has an active Facebook page and appears to have 250 mobile home sites. Legal aid staff also recently identified a mobile home park that closed down in the latter part of 2019, which is why we have revised our estimate of open parks to 88 from 89. It is possible that additional parks have closed as well since we received the city's data in mid-2019.
- 4 American Housing Survey 2017. San Antonio-New Braunfels, TX MSA (2013 OMB definition). The American Housing Survey data, used here and later in this report, includes people living in manufactured and mobile homes, but excludes people living in RVs, trailers, and vans.
- 5 American Housing Survey, 2017. San Antonio-New Braunfels, TX MSA (2013 OMB definition).
- 6 American Housing Survey, 2017. San Antonio-New Braunfels, TX MSA (2013 OMB definition).
- 7 American Housing Survey, 2017. San Antonio-New Braunfels, TX MSA (2013 OMB definition).
- 8 American Housing Survey, 2017. San Antonio-New Braunfels, TX MSA (2013 OMB definition).
- 9 City of San Antonio Development Services Department data (2019). Information comes from number of registered and useable sites, not occupied sites (i.e., there could be fewer mobile homes than number of useable sites).
- 10 Foroohar, Rana. "US private equity moves into trailer parks," Financial Times. May 19, 2019. <https://www.ft.com/content/7addf0c8-77d6-11e9-be7d-6d846537acab>.
- 11 Based on data from Bexar Central Appraisal District, July 2019. Data on file with authors.
- 12 Smith, Zachary. "Private equity firms rapidly investing in mobile home parks," Wall Street Journal. Apr. 20, 2019. The data on Yes Companies' local holdings is from Bexar Central Appraisal District, July 2019. Data on file with authors.
- 13 Taylor, Paul and Richard Fry. "The Rise of Residential Segregation by Income." Pew Research Center. Washington, DC. August 12, 2012.
- 14 Based on analysis using data from the American Community Survey 2017 (5-year estimates, Tables S1701, S1501, S2502, and DP05 for the City of San Antonio and the San Antonio-New Braunfels MSA).
- 15 The data on mobile home park locations was obtained from the City of San Antonio Development Services Department in June 2019.
- 16 Data and map on file with authors.
- 17 Based on data from the City of San Antonio Development Services Department, news reports, and original research.
- 18 City of San Antonio Ordinance 2017-12-14-1009, <https://docsonline.sanantonio.gov/DSDUploads/MLPOrdinance201712141009.pdf>
- 19 City Code of San Antonio, Sec. 18-11(5) (2019).
- 20 As identified using data from the Federal Emergency Management Administration (FEMA), last updated for Bexar County in 2017. Source: https://tiles.arcgis.com/tiles/Eb8y2VjBgkqbQJwk/arcgis/rest/services/flood_fema_floodplain_allSARB_hosted/MapServer

- 21 Based on data from the Texas Commission on Environmental Quality.
- 22 Way, Heather, Jake Wegmann, Elizabeth Mueller. “Uprooted: Residential Displacement in Austin’s Gentrifying Neighborhoods and What Can be Done About It.” The University of Texas at Austin. 2018 (Uprooted Report). <https://sites.utexas.edu/gentrificationproject/..austin-uprooted-report-maps/>.
- 23 Generally speaking, census tracts in the early stages of gentrification are home to an above-average share of lower-income and less-educated persons and have experienced high appreciation rates in the past decade or are adjacent to tracts with high appreciation rates. For more information, see Part Two of the Uprooted Report, <https://sites.utexas.edu/gentrificationproject/files/2018/10/part2.pdf/>
- 24 For a more in-depth discussion of gentrification and how to measure where it is occurring, see the Uprooted Project website, <https://sites.utexas.edu/gentrificationproject/>.
- 25 National Association for Latino Community Asset Builders. “An Analysis of Housing Vulnerability in San Antonio.” January 2018. Prepared for the City of San Antonio Neighborhood and Housing Services Department.
- 26 City of San Antonio, “Examples of Uses Permitted in Zoning Districts (Unified Development Code),” <https://docsonline.sanantonio.gov/FileUploads/dsd/Examplespermitteduses.pdf>.