


# Mobile Home Parks:

## A Disappearing Form of Affordable Housing

# Acknowledgements


## Joe Gavin (San Diego Seniors Community Foundation)

The San Diego Seniors Community Foundation was founded in December 2016 and qualified as a 501(c)(3) nonprofit organization. Our mission is to transition San Diego seniors from vulnerable to vibrant, through the power of philanthropy, so that no local senior is left without access to the resources to thrive. We envision a world where the senior population of San Diego County is nurtured into a healthy, dynamic way of life; where they are socially connected, physically active and a vital element of our community. We provide leadership in the San Diego older adult network with a goal of ensuring that every senior has someone they can turn to and trust.

## Linda Walshaw (CEO, Mobile Home Advisory Committee, Inc.)

Mobilehome Advisory Committee, Inc. ("MAC") is a California 501(c)3 non-profit dedicated to educate mobile homeowners about their rights and laws, advocate on their behalf, and provide assistance and referrals to resources and legal help as needed. Although manufactured homes are California's largest source of affordable housing for seniors, veterans, the disabled and low income families, mobile home parks are disappearing as equity investors target these large parcels of land for development. MAC is comprised of representatives from many mobile home communities and several are former City Commissioners. We network with city / county / state resources, staff and officials, as well as local attorneys specializing in mobile home and real property law. By volunteering our time, we help mobile homeowners get the help and information they need as quickly as possible. MAC advocates for, protects and defends these vulnerable homeowners against equity investors who seek to profit by raising space rents underneath their homes, displacing these homeowners, then renting out the homes they acquire as park-owned units at market rate, or converting parks to high-rise, high-density development.

## Global Health Research and Design Team at UC San Diego 2021-2022

The Global Health Research and Design team is a project-based student organization at the University of California, San Diego. We partner with nonprofits to improve health issues at both the local and global levels, doing so with respect to the complex social determinants to health outcomes. Our members come from diverse backgrounds and are united by a shared passion for making a positive impact in the lives of people worldwide.

Photos from materials provided by Linda Walshaw

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# Introduction

There's rarely a day when local newspapers do not have at least one story related to the housing crisis in San Diego County. If it is not a piece on the issues of homelessness, it is a story on the increase in rental homes that affect the neighborhood fabric. Stories abound on the lack of affordable housing, sky-rocketing prices for rents and single-family homes, cities failing to meet affordable housing requirements, and communities supporting the building of higher-density housing—as long as it is in someone else's neighborhood.

This report delves into mobile home parks—a sector of the housing network in San Diego that does not get much attention despite its role as a critical form of affordable housing. A mobile home park is defined as an area of land or property containing two or more mobile homes, manufactured homes, recreational vehicles, and/or lots for rent or lease.[1] In a mobile home park, mobile homeowners own their homes and are only renting the small space upon which the home sits. In this way, mobile home park rents are more comparable to renting a parking space than renting an apartment or other housing

With almost 400 mobile home parks in San Diego County, manufactured homes are a primary source of affordable housing for those priced out of other forms of housing, including seniors, veterans, widows, the disabled, and families with low incomes. Despite their importance, these parks and the number of affordable spaces within them are vanishing. Similar to other forms of housing, the mobile home is susceptible to the pressures of the changing landscape of housing as a commodity in the United States. This has resulted in equity investors, billionaires, and real estate developers buying up mobile home parks that threaten the housing security of vulnerable residents, especially the most vulnerable populations in San Diego who no longer have the means to afford housing. This new breed of park owner views residents as "captive customers" who cannot afford rising space rents but cannot afford to move or live elsewhere. This is of large concern for San Diego County, which is 2nd among the top 5 counties at risk for losing affordable housing.[2] These changes paint a troubling picture of the future, one that merits the attention of State, County, and Local governance and stakeholders and advocates in an effort to find solutions to this troubling trend. At the core of this piece is a fundamental question. It is not the intent of the authors to advance an argument on optimal use of lands. We do not dispute the notion that technically there is a better use or more profitable use of these lands. We ask what will happen to the residents of mobile home parks, a majority of which are over the age of 55, if the housing they have been relying upon disappears?

# Demographics

Mobile home parks are a critical form of affordable housing for all populations, especially for older adults. And living in a high-cost area such as San Diego makes these homes even more important for individuals with limited incomes. According to the U.S Census Bureau's Household Pulse Survey, over 3.2 million Americans live in mobile home parks with 1 in 3 adults over the age of 60.3 There is no data that explicitly indicates the percentage of older adults in San Diego that reside in mobile home parks, but the authors project that the percentage is much greater than the national average.

By 2033 or 2034, the United States will experience a demographic milestone that has no precedent in modern society. There will be more people over the age of 65 in the country than under the age of 18.[4]

Looking ahead to 2050, the three largest percentage increases in population in San Diego County are in the three oldest age groups: Age 75-79: 69% increase ← Age 80-84: 118% increase ← Age 85 plus: 157% increase. The consequences of such a seismic shift in population will produce significant strains across all sectors of society.

In 2000, San Diego County was home to 404,000 individuals over the age of 60; by 2030 that number will increase to almost 930,000.[5] To put this into perspective, the increase from 2000 to 2030 of over 525,000 people is roughly equivalent to the entire population of the city of Atlanta, Georgia.

## SANDAG Series 13 Regional Growth Forecast 2020-2050

| | **Population Net Growth** | | **% Growth** |
|---|---|---|---|
| **Community** | **2020-2050** | **Residents 60+** | **Residents 60+** |
| Carlsbad | 6068 | 8615 | 142% |
| Chula Vista | 58413 | 35188 | 60% |
| Coronado | 585 | 1060 | 181% |
| Del Mar | 333 | 266 | 80% |
| El Cajon | 12704 | 5633 | 44% |
| Encinitas | 3762 | 5241 | 139% |
| Escondido | 8411 | 3283 | 39% |
| Imperial Beach | 4185 | 2776 | 66% |
| La Mesa | 16779 | 7735 | 46% |
| Lemon Grove | 4019 | 2439 | 61% |
| National City | 22779 | 10499 | 46% |
| Oceanside | 11537 | 11161 | 97% |
| Poway | 3123 | 2885 | 92% |
| San Diego | 324669 | 144986 | 45% |
| San Marcos | 14100 | 6153 | 44% |
| Santee | 6816 | 4661 | 68% |
| Solana Beach | 1494 | 1275 | 85% |
| SD County Unincorp. | 103807 | 49496 | 48% |
| Vista | 29462 | 7975 | 27% |

This table, created with data compiled from the San Diego Association of Governments (SANDAG), demonstrates the growth of the 60+ age group community and overpopulation in the 18 cities of the County and the Unincorporated areas.[6]

It is important to consider the financial data of this older adult population. Almost 50 million Americans over the age of 50 fall into the low to moderate income category. Of these, 83% struggle somewhat or completely with components of their financial lives from living check to check, having outstanding debt, and not being able to accumulate adequate savings.[7]

In 2019, half of Medicare beneficiaries lived on less than $29,650 a year. One in four lived on less than $17,000. One in four had savings less than $8,500.[8] Nearly half of single Social Security recipients rely on the benefit for 90% or more of their income.[9] In addition, 39% of low to moderate income adults around the age of 50 and over report having debt that is unmanageable.[7] From 1999 to 2019, total debt for individuals over the age of 70 increased 543%, the largest of any age group.[10] However, even before the economy started to falter due to COVID-19, half of all seniors had savings of $83,850 or less, a quarter had less than $9,650, and about one in ten (12%) had no savings at all.[8]

The Elder Economic Security Standard™ Index (Elder Index), was developed by the Gerontology Institute at the University of Massachusetts Boston.[11–12] The Elder Index is a measure of the income that older adults need to meet their basic needs and age in place with dignity. The Elder Index is specific to household size, location, housing tenure, and health status. When viewed in comparison to the Federal Poverty Level (FPL), an official measurement of economic security utilized by the federal government, it portrays a very different illustration of need among the older adult population. The following presents the stark contrast between what is recognized as poverty by the government and what is needed to meet basic expenses according to the Elder Index. The disparity is presented through a breakdown along racial groups:

| | Under FPL (single older adults and couples) | Under Elder Index (singles older adults) | Under Elder Index (older adult couples) |
|---|---|---|---|
| White | 7% | 47% | 21% |
| Asian | 10-16% | 59% | 36% |
| Black | 19% | 64% | 34% |
| Latino | 17% | 72% | 49% |

## San Diego Housing and rental breakdown (Summer Fall 2022)

The value of land is at the crux of this emerging issue that threatens the household security of thousands of San Diego older adults. The price of housing, always a challenge in a high-demand area such as San Diego, has exploded over the last few years.

In a review of median home prices in cities of Southern California, the Los Angeles Almanac reported that the average home price in San Diego in December 2012 was $418,290. In December 2021, that figure doubled to a median price of $836,700.[13] Contributing to the huge increase in housing costs is the "commodification" of single-family homes. In the last quarter of 2021, 1 in 5 home purchases in San Diego were purchased by investors.[14] Investors' interest is not on high-end properties but on the lower-end of the market and entry-level homes for first-time buyers. These homes at the lower range are the most popular with investors, making up 37 percent of purchases in the fourth quarter of last year, according to Redfin. A Washington Post article reported that single-family home sales to investors in 2021 were the highest in two decades with homes in Black neighborhoods disproportionately affected.[15]

RentCafe reports that the average rent in San Diego in July 2022 is $2,916.00. Only 3% of local apartment inventory has rents under $1,500, 13% of the inventory has rents priced at $2,000 or lower. There are more renter-occupied households in San Diego than owner-occupied households (53% rented, 47% owned).[16]

Rent.com reports in July 2022 that the average studio apartment rent is $2,232, a 7% increase over July 2021. The average rent for a 1-bedroom apartment is $2,900, a 19% increase over last year. The average rent for a 2-bedroom apartment is $3,755, a 22% increase over July 2021. The average rent for a 3-bedroom apartment in the San Diego area is $5,188, a 6% increase from last year. The San Diego region rental prices are well above the national average of $1,706. The difference is over $1,200.[17]

## Mobile home specific data

Although mobile homes do tend to cost less than other forms of housing, it is important to note that older adults in mobile homes have lower income and thus pay a similar share of their income for housing-related costs as compared to older adults living in other housing settings.[18] Unlike apartments, mobile homeowners own their homes and pay property taxes on homes built after July 1, 1980, in addition to space rent, plus all maintenance and utilities. Along with other forms of housing, mobile home prices and mortgages have increased exponentially along with space rents, rendering them no longer "affordable" to those who need housing most. The Consumer Financial Protection Bureau estimates that in 2019, older adults who owned their mobile home spend an average of 24% of their income on housing, comparable to the average 23% that older adult homeowners of other forms of housing paid.[18] According to the Department of Housing and Urban Development, households spending more than 30% of their income on housing costs are considered cost-burdened, and households spending more than 50% of their income on housing costs are considered severely cost-burdened.[19]

Census data from 2019 found that 25.3% and 55.7% of older adult mobile home homeowners and renters were considered cost burdened, respectively.3

increases in housing, education, health care, and a longer retirement period to budget for and the impact of not one but two major economic cataclysms in a span of 12 years, the 2008 recession and the 2020 COVID-19 pandemic.

The California Department of Housing and Community Development is the regulatory body for Mobile Home Parks in California. The Mobile home and Special Occupancy Parks Program develops, adopts, and enforces state regulations for the construction, use, maintenance, and occupancy of privately owned mobile home and special occupancy parks throughout California, which assure owners, residents, and users protection from risks to their health, safety, and general welfare.

HCD manages the titling and registration for mobile homes, manufactured homes, commercial modulars, floating homes, and truck campers.

HCD also protects families and individuals who live in mobile homes by inspecting mobile home parks for health and safety violations in areas where the local government has not assumed enforcement. HCD further protects consumers by enforcing regulations for those who build and sell manufactured homes.

According to HCD, San Diego County has almost 400 mobile home parks with over 39,000 units. In Appendix A[67], the name. location, and other data of the nearly 400 mobile home parks are provided from information pulled from HCD.

However, mobile home parks have been disappearing, with the total number of mobile home parks in California having steadily decreased over the past decade.[2, 20-21] The mobile home parks that remain are significantly increasing their space rent prices. Both the disappearance of mobile home parks and the rising space rent prices ultimately contribute to a decrease in affordable housing options and the displacement of many mobile home park residents. In this report, we want to discuss how the current trends of mobile home park closure and space rent increases impact the affordable housing market and mobile home park residents.

## Redevelopment and the loss of affordable housing

Mobile home parks have become subject to closure and subsequent redevelopment due to the increasing value of land,22-24 which is an emerging issue that threatens the household security of thousands of San Diego older adults.

This is unsurprising, given that the lands on which mobile home parks stand reportedly have the potential to be about 5 to 6 times more valuable if they were instead used for dense residential and commercial facilities[21] as a result of the capacity to build upward, or accommodating more units in the same area of land.[20] Redevelopment of these mobile homes can bring tangible benefits due to the increased influx of capital and economic investment.[25]

Nonetheless, mobile home parks are an important form of low-cost housing. In an interview, sociologist Esther Sullivan stated that mobile-home parks now make up one of the largest portions of non-subsidized low-income housing in the US and have served an important role in the affordable housing landscape since affordable housing stopped receiving federal support.[26] Although some mobile home parks are redeveloped into other forms of housing, these new developments are typically above the price range of current residents.

The loss of mobile home parks is part of a larger decline in affordable housing.

A recent report published by the San Diego Housing Commission stated that nearly half of the city’s 70,000 affordable housing units are at risk of being lost by 2040.27

And this estimate does not include erosion of single-room occupancy hotel units and mobile home parks, two under-the-radar types of housing that provide low-cost options for older adults. Due to the increasing value of land and the resulting incentive to redevelop mobile home parks, as well as the overall trends of decreasing affordable housing options, we must consider how the loss of these parks will affect the availability of affordable housing and how redevelopment might be better regulated to prevent an even worse housing crisis.

# Rent increase due to investors

The affordability of mobile home parks is also threatened by increasing rent prices. As it turns out, the affordability of mobile home parks is not just attractive to its residents but also to large investment groups and investors.

> The majority of mobile home parks were built in the 1960's and 1970's as "mom and pop" operations. Now with aging infrastructure (electrical, water, sewer systems), many original park owners face either spending millions to repair and replace original infrastructure, and instead opt to sell their large parcels of land, the value of which has increased significantly over time.[28–29]

These groups frequently buy mobile home parks to redevelop them, but they often raise rent prices in the interim to increase profits.[29-30] These rent increases can go up to market price and thus become financially impractical for residents on fixed incomes. In an interview, George McCarthy, president and CEO of the nonprofit Lincoln Institute of Land Policy, states that investors often raise space rents by 20%-50%, and sometimes even up to 70%.[28] This is partly due to the fact that the only manufactured homes being brought into parks in recent years are owned by the park owner(s), not individual homeowners, and are being used as rental properties at market rate. In Oceanside, CA, there has been a transition from rent-controlled prices to market rate rent ever since investors bought mobile home parks, resulting in up to 300%-400% increases in space rent prices.[21]

Investors who purchase a mobile home park can resort to aggressive methods to make a profit off of their investment through increasing the rent and incorporating new policies and fees for the tenants, with little to no consequences.[26, 28]

Examples of this include mobile home parks such as Colony Cove in Carson, CA that attempted to raise the monthly rent of the senior-only mobile home park from the average $413 to $1,032. The park has also gone to court in attempts to bypass rent control laws.[31] Some investors deliberately take advantage of the fact that residents cannot move out. Mobile Home University, a "boot camp" headed by two of the biggest owners of mobile-home parks in the US,[30] teaches individuals how to earn huge sums of money from buying mobile home parks. MHU states that raising rent prices in mobile home parks is a lot easier since the tenants can't afford the average costs of $5,000 to move the mobile home.[30] Hence, the largest profits for park owners come from acquiring the mobile homes for use as park-owned rental units at market rate, using any means possible. This includes practices to acquire the homes such as blocking or delaying a homeowner's home sale, ignoring, or rejecting qualified home buyers, unlawfully raising rents for heirs who inherit, charging daily storage fees for every day the home remains in a park, charging buyers unlawful fees, telling new buyers that there is no rent control. Or worse, hostile management practices that threaten and intimidate residents who have little to no means for recourse and thus must endure for fear of being displaced.[32–33]

On-site managers also often insist on meeting with new buyers without their real estate agent present, then require the buyer(s) to immediately sign a lease that waives the buyer's right to rent control and requires the new homeowner to sell only to a buyer who assumes the lease. New buyers don't know that cities like Oceanside have rent control that pertains to all parks, or that California Mobile home Residency Law (MRL) gives buyers 30 days to inspect the lease and consult legal counsel before signing. Managers simply tell buyers if they want to live there, they must sign the lease, or they can't buy the home. These tactics are especially effective with the most vulnerable elderly residents who may need to buy a home if it's the only one they can afford or sell a home urgently to go into assisted living or move in with family to care for them. These tactics are also very effective with low-income families who speak little English, and heirs who know nothing about mobile home rights and laws. Parks often raise rents (unlawfully) for heirs and turn away buyers for the home. The park then acquires a home for pennies on the dollar, then rents it out at market rate for the park owner(s)' own financial gain. Due to how many investors are approaching mobile home parks to make a profit, many residents of mobile home parks around the country are concerned, fearing increases in rent and poor responsiveness from new prospective owners with regards to serving the needs of the tenants.[26, 28]

## The impact of rent increases on residents' finances

The disappearing affordability of mobile home parks leaves their residents with limited options. Residents, many of whom are financially burdened as previously discussed, cannot afford to move to more expensive housing options and the lack of affordable housing developments for seniors in San Diego only adds to an adverse housing environment. Older adults on fixed incomes must not only combat the annual cost of living increases, especially in areas of housing, caregiving, long-term care, and healthcare that are predominantly unique to the age cohort, but also endure the fluctuations of the economy and inflationary pressures that are so prevalent in the autumn of 2022. Those without the means to relocate are forced to sacrifice other essential needs in order to pay rent and avoid homelessness, like rationing insulin.[35–36]

A survey by the US Census Bureau found that older adults in mobile homes face more frequent financial difficulties than those in other housing situations, even when accounting for income. Twelve percent had difficulties paying for household expenses, and around a quarter had trouble paying for food (25.1%), paying their energy bills (22.1%), and keeping their home at a safe temperature (26.3%).3

# Investor interest is here to stay

Investor purchasing has been shown to negatively impact residents, especially marginalized groups like seniors on fixed incomes, and there is no sign of it slowing down. In fact, data from the past decade show that popularity in investing in mobile home parks has only been increasing,[37] with a growing trend of private investors purchasing mobile home parks across the United States and increasing rent prices.[30, 38] The growing interest in mobile home parks by private equity and institutional investors can be attributed to increased public demand for mobile home parks. This high demand contributes to the steady return rate and low risk of investment that makes investment appealing. These same reasons made investor interest in mobile home parks even higher during the pandemic.[39-40]

The profitability of mobile home parks comes from the growing income inequality in the nation that pushes individuals to find cheaper forms of housing, thereby increasing demand for mobile home parks and increasing the security and profitability of mobile home parks in the eyes of investors.[26, 41]

In an interesting twist, investor interest in mobile home parks and the subsequent rent increases that occur, further exacerbates the income inequality that made mobile home parks a strong investment option in the first place.

## The impact of forced relocation on residents

Mobile home parks are a necessary part of the affordable housing market, a market that will be vital to the well-being of many baby boomers who are approaching their senior years. This points to the necessity of slowing the redevelopment of mobile home parks, reining back the rate at which rent prices are increasing in parks, and increasing the building of new affordable housing. Such a plan is in line with California's Statewide Housing Plan,[42] which lists "keep Californians in their homes" as their first objective. Specifically, this plan states that "it is imperative that we keep people in their communities and homes and preserve existing affordable homes. Some of our most affordable housing units are the ones that we already have." The California Master Plan for Aging espouses similar goals and cites the number one goal in their 10-year housing blueprint.[43]

Given the appeal of redevelopment and aggressive manner through which investors are raising rent prices, ensuring that residents are properly relocated should also be seen as an important step if mobile homes do continue to close or become unaffordable. Relocation has its own set of challenges, however, as moving out is costly, and moving the mobile home itself is not a realistic option. This is due to the exorbitant cost to acquire another space elsewhere, dismantle and transport the existing home, reconstruct it to current Code requirements, and damage caused by the transportation of the mobile home. Homes older than 5 years are not accepted in other parks which are interested only in new homes for use as park-owned rentals at market rate. Additionally, there are no plans at the city, county, or state level for relocating or providing housing for seniors, veterans, the disabled, and low-income families that are displaced when these mobile home parks are closed or converted. Even with proper notice, mobile homeowners are entitled only to moving expenses, not the value of their homes. Homes have little or no resale value in a park that has announced closure or conversion, although some park owners resell them in Mexico. These moving expenses are calculated by taking the price of a nearby, similarly sized apartment, subtracting the rent control amount and multiplying it by 12 months. This amount is not enough for the residents to relocate or stay near their family or community.[44]

There is further evidence that selling your mobile home in the face of closure is not an option. At best, a home could be sold to a salvager for pennies on the dollar, but park owners must approve a buyer for the home and won't accept new buyers for a closing park. Thus, the only option would be to move the mobile home to another park, an option that is limited by the condition of the home and few, if any, vacancies.[45] The inability to sell their home demonstrates the significance of residents being entitled to the value of their home in addition to moving costs. It also explains why individuals like this former Utah mobile home park resident described themselves as "lucky" for being able to sell their home for only a third of what they thought it could sell for.[24]

Senior specific issues with regard to relocation must also be considered. Physical limitations can discourage seniors from resisting evictions,[25] potentially making many seniors more susceptible to forced relocation. This may partly explain why a resident at Rancho San Luis Rey Mobile Home Park in Oceanside, shared in an interview his experience with the predatory practices of mobile home park owners on residents mostly in their 70s and 80s, who are too afraid to stand up and potentially face retaliation.[21] It would also be challenging for many seniors to physically relocate due to mobility-based disadvantages.[46] Additionally, with approximately a quarter of older adult mobile home homeowners being considered cost burdened, monetary concerns must also be considered.[3] Moving may not be a viable option for many seniors on fixed incomes, who do not have many options to increase their income to move to more expensive housing options.

One form of support that could potentially help with this financial burden comes in the form of the Section 8 housing voucher, the most commonly known and recognizable form of housing assistance.[47] However, the wait list for receipt of a voucher is currently 11 to 12 years for the City of San Diego, and 9 to 12 years for Oceanside. Seniors do not get priority for this voucher, which goes to families with minor children. For older adults, there exists affordable housing environments in the form of the Department of Housing and Urban Development (HUD) Section 202 housing and tax-credit financed apartment buildings.[48–49]

Both the County and City produce an annual guide that lists all such properties that are either operated by individual entities or by the respective housing authorities. While the lists are extensive and provide housing options in nearly every region of San Diego, there exists many impediments for older adults in having any options within a timely manner. Most of the listed entities that are identified as for older adults or elderly have no vacancies and wait lists of several years. In numerous cases, due to the high demand, property management tells prospective tenants that the waitlist is closed. Also, there is no central point of application for older adults seeking housing. Each listing requires a phone call to the particular property and requires a specific application or interest list submittal to that property only. There is also the matter of some properties that are listed in this "affordable" guide that do not meet the standards of the term. A recent call placed to an apartment complex in Vista that is included in the County Affordable Housing guide was made only for the caller to be told that while it is an older adult complex, the rents start at $1900 a month. For the numbers of older adults, both current and in the future, many of whom live on fixed incomes, these rent prices do not qualify as affordable.

# Not In My Backyard

Additionally, due to many residents in mobile home parks being part of marginalized demographics, their issues are unseen and the role that mobile home parks play in the affordable housing market are poorly understood. This results in situations where the importance and necessity of affordable housing is generally agreed upon but is not valued in practice. In fact, surrounding residents that oppose the development of manufactured housing, referred to as NIMBY ("not in my back yard"), are a contributing factor for the regulations that prevent the construction of such affordable housing. NIMBYism is partly driven by the perception that mobile homes are of lower quality even though modern manufactured homes are similar to others in the same price range.[50] In California, such attitudes have resulted in the cancellation of plans to build affordable housing for seniors due to complaints about possible decreases in quality of life.[51] These attitudes extend to mobile home parks, as according to a survey conducted in Wisconsin, over 70% of respondents of the survey did not believe there was a need for additional mobile home parks, especially respondents with a higher income.[52] Essentially, large investment firms and other groups with money and power have more leverage and power than the residents of mobile home parks, and so often the wishes of park residents are overlooked in favor of the desire of groups like large investment groups. It is important to recognize that there is a desire to make a profit off of mobile home parks, and this often leads to poorer conditions for park residents.

In summary, redevelopment and rising rent prices of mobile home parks decrease the availability of affordable housing for residents who rely on the low price that parks offer. The effects of these trends are all too visible in San Diego, forcing individuals into homelessness and making it difficult for them to escape.[53] The housing insecurity for many living in mobile home parks is significant enough that a study used the term “quasi-homelessness” to describe their situation.[54]

## Health and Interpersonal Disadvantages

Although the disadvantages residents face as a result of rising rent prices and redevelopment of mobile home parks can be looked at entirely through the framework of larger social trends, we must not forget that these trends ultimately affect the lives of individuals in the community. The purchasing of mobile home parks, the substantial loss of affordable housing, and increase in inflation affects residents' health, social networks, and individual experiences to a great extent.[55]

Many residents had planned on retiring within their mobile home, but due to the disappearance of mobile home parks as an affordable option for housing, grandparents are forced to relocate away from family, grandchildren, churches, doctors, and their social networks. Families lose grandparents who act as caregivers for working parents, causing financial hardship for families who can't afford daycare. By being forcibly removed from a space they are comfortable and familiar with, they are more likely to suffer from negative changes to mental and physical health.[40, 56-60] Individuals with physical movement limitations, those with cognitive impairment, and those who feel unsafe are especially vulnerable.

Whether residents relocate or not, the increased stress due to increased rent and housing insecurity can have detrimental effects on their health. Housing insecurity has been linked to increased levels of stress for prolonged periods of time, also known as "toxic stress," with housing insecure individuals are more likely to experience poor health.[61-62] Increased rent was also found to be associated with deteriorating health, including obesity, mortality, depression, and cardiovascular disease.[63]

Furthermore, housing insecure individuals are more likely to be medically insecure, as they are less likely to have a stable source of medical care, and more likely to seek treatment in the emergency room and delay routine doctor's visits.[62]

Elderly people are more likely to be chronically ill, and the added stress of housing insecurity can result in exacerbation of both chronic illness and toxic stress.[64] This is of particular concern for mobile home residents, as older adults living in mobile homes were found to experience increased housing insecurity compared to older adults in other forms of housing.[3] The vicious cycle of financial instability, housing insecurity, illness, and further increased stress is detrimental to residents who are already stretched beyond their means.

The increases in mobile home park rent prices are often justified by promises of facilities and safety improvements. However, they would often leave these promises unfulfilled.[65] One example of this is the Country Meadows Mobile Home Park in Colorado, renamed Ski Town Village, where rent not only increased by 73%, but the promised improvements have been left forgotten. Potholes remain on the road and residents cannot rely on spigots for a reliable water source.[65] This, and other similar examples of ignored facility improvements, end up negatively impacting the residents that reside in the parks. Despite having the means to make needed safety improvements, investors continue to ignore malfunctioning facilities. A report states that mobile home residents are twice as likely to die via fire, and the homes themselves are five times more likely to be wind damaged when compared to houses in the same area.[54] Furthermore, in California, those living in mobile homes are four times more likely to experience a water system shut down and 40% more likely to then use groundwater as an alternative.[66] As essential forms of housing, mobile home parks should be given additional financial backing to address these issues and improve living conditions for our most vulnerable populations. Instead of supporting park residents, investors are taking the opposite approach—taking money from residents to benefit themselves while ignoring the safety concerns they have the legal and moral obligation to address.

It is important that the disappearance of mobile home park affordability be examined not only through the lens of financial and legal data, but within the context of individual lives as well. It is in this context where we see the extent to which the loss of park affordability impacts residents' well-being, and where we examine if we as a society are doing enough for our vulnerable populations.

> In fact, housing is one of the most well-known social determinants of health, and health outcomes and healthcare costs are shown to improve with implementation of certain low-income housing interventions.[55]

This means that this housing crisis should not be framed in terms of the negative health effects that are caused by lack of housing; rather, this crisis should be looked at as an opportunity for the government to drastically improve underserved communities' health through housing interventions.

## Regional Focus: Oceanside, CA

Oceanside, California once had 19 mobile home communities. Over time, parks have been inherited by heirs, then sold to corporate entities, and now private equity investors. Two parks, Catalina and La Playa Vista , were closed by owners and converted to luxury condominiums. La Playa Vista didn’t comply with the City’s Zoning Conversion Ordinance (Article 34) which requires 12 months’ advance written notice and approval of a tentative relocation plan. The penalty for failing to comply with a City Ordinance was merely a $100 fine.

Colliers International (“global commercial real estate services”) represented the buyers in the acquisition of Sandy Shores to GMC Ocean, LLC. Although new owners stated plans to “continue operation of a RV park on the property,” no plans were announced for the remaining mobile homes. Annual City data shows only 19 of the 44 spaces remain protected by Oceanside’s Rent Stabilization Ordinance 16B.

Terrace Gardens was acquired for $4,800,000 by Victor Martinez & Associates (“VMA,” “Martinez & Associates, Inc.”), “an advisory brokerage firm specializing in mobile home parks and self-storage centers,” in addition to being a “commercial real estate & property management company.” Upon acquisition, VMA attempted to fit 11 new double-wide manufactured homes into single wide spaces at Terrace Gardens without first obtaining City permits. These new homes remain vacant and offers to purchase by existing residents continue to be rejected by VMA. Terrace Gardens remains “under construction,” with many outstanding Code violations, closure of community amenities for over 2 years, loss of amenities, and potholes; all of which have been reported to City officials at public meetings and in writing by residents and the HOA. Terrace Gardens is one of 9 Oceanside parks that did not pass its annual City inspection, thus not granted this year's annual permissive rent increase. Of its 74 total spaces, 18 are reported as "vacant," 5 are reported as park-owned rentals at market rate (triple the amount for rent-controlled spaces), with 1 space occupied by management. Residents fear the newer homes left vacant by VMA may be simply "window dressing" to entice other investors to acquire the park for VMA's profit or to show added value on paper to obtain more loans to acquire more parks. In the meantime, the elderly residents continue to live in chaos and uncertainty, without the amenities that existed when they purchased their homes.

Luis Rey, LLC acquired Rancho San Luis Rey, Oceanside's largest park (433 homes) valued at $18.5 million in 2018, from the Richter family for $33 million. Luis Rey, LLC immediately assigned all rights, title and rents into a high-risk investment offering on Wall Street, along with 29 other parks and properties they own.

> Under the CLO, if profits are shown during the first year or two, the interest rate for their original loan is reduced to 2 – 3%, allowing these equity investors to qualify for additional loans to acquire more properties.

The business plan for Rancho San Luis Rey, a section of the CLO investment offering, states that Luis Rey, LLC would (and has): "installed solar electric generating equipment to . . . reduce electric utility costs, while still billing customers at a market rate for the utilities . . . and is expected to produce a net reduction [to the park owner(s)] in utility costs of approximately $313,000 per year." In addition to the solar installation, over 50 trees were removed, grass areas with picnic tables were removed and replaced with gravel, thus reducing the park's maintenance expenses and increasing profits for investors. Residents' water was included in their original rental agreements, but Luis Rey, LLC installed individual water meters and began charging residents.

As of this year's City filing, Luis Rey, LLC has acquired 25 homes at Rancho San Luis Rey as park-owned rentals, no longer covered by Oceanside's rent control and currently renting at $2,500/month.

Residents' rent checks are being cashed by "M.A. Cirillo & Associates," a California corporation which is not named as a party to Luis Rey, LLC, the park owner of record. Rancho San Luis Rey's Oceanside business license is listed c/o of Star Management, when local attorneys have confirmed that a park owner may not pass the park's liability onto a management company, the park's employee. City staff confirms that a management company must have a city business license of its own showing its own business address, yet neither Star Management nor Luis Rey, LLC have been required by the City of Oceanside to correct their filings.

From October 1, 2020, until May 20, 2022, Rancho San Luis Rey's ownership entity, Luis Rey, LLC, was forfeited by the CA Secretary of State. Yet the City of Oceanside continued to grant Luis Rey, LLC permissive rent increases during the 2 years of forfeiture. The City granted the rent increases even though the park owners had been ordered 2 years prior to repair and/or replace inoperable water valves throughout the park, putting 433 homes at risk in the event of fire. Rancho San Luis Rey also did not pass its City inspection this year, and the completion of water valve repairs and rent increase are still pending before the City's Manufactured Home Fair Practices Commission.

Mission View West Mobile Manor in Oceanside was purchased under the name "MV-W, LLC," and they immediately applied to the City of Oceanside for a lot split at the corner of the park property. This request to change the zoning from "medium density residential" with a "senior overlay" to "special commercial" zoning and removal of the "senior overlay" was granted by the City of Oceanside. This area is also part of Oceanside's Historic Plan which designates the opposite corner where Mission View Manor is located as a "future resort hotel." In the meantime, Mission View West's current City filings show that of the original 108 rent-controlled spaces, 19 are now park-owned rentals renting at market rate, and 15 (from 0 the prior year) are now exempt from rent control under predatory leases. Although health and safety laws require on-site management to be available 24/7 for multi-family (and especially senior) communities, the MV-W, LLC reports 0 management space, and residents report that Star Management at Rancho San Luis Rey manages both parks.

On July 15, 2020, Laguna Vista MHC, LLC purchased Laguna Vista Mobile Estates in Oceanside for $37,750,200. The park is also managed by MHC Management, Inc.. Laguna Vista MHC, LLC unlawfully imposed new fees and charges, including a $500 "document processing fee" to new unsuspecting buyers. Although prohibited by CA Mobile home Residency Law, Oceanside's Rent Stabilization Ordinance 16B, and the City's separate Regulatory Agreement with the park owner, when reported, the City took no steps to intervene or uphold its ordinance or agreement. The Regulatory Agreement requires Laguna Vista to keep 150 spaces available to low-income buyers. For that reason, it is the only park in which residents must provide proof of income annually and the only park that can be counted by the State of California as "affordable housing." Additionally, heirs who inherit homes report rents being raised to $2,000/month plus "storage fees" for every day their inherited home remains unsold. Although City staff confirms that rent control remains intact with the space and to the following residents, the City has taken no action to uphold 16B. Instead, Laguna Vista MHC, LLC has filed an NOI Application (Net Operating Income) with the City, requesting an additional 26.67% rent increase above this year's 3.9% permissive rent control increase, in spite of its Regulatory Agreement with the City. Such fees and rent increases contradict not only the City's Rent Stabilization Ordinance, but the terms and conditions of the park's Regulatory Agreement with the City.

## Current Status of Oceanside Mobile Home Parks

The status of Oceanside's mobile home parks as of annual city data is as follows: Cavalier: 21 park-owned rentals, 1 management space; Laguna Vista: 3 park-owned rentals (+ pending 26.67% rent increase above current rent control); Lamplighter: filed blank report; La Salina: Of 101 spaces, only 15 remain on rent control; Miramar: 11 vacant spaces, 4 park-owned rentals, 135 spaces not on rent control, only 16 spaces remain on rent control; Mission View Manor: Of 165 total spaces, 72 are now park owned rentals, 1 management space, leaving 92 spaces on rent control; Of 108 total spaces, 19 are park-owned rentals, 15 are not on rent control, leaving 74 spaces on rent control; Mission View West: Of 108 total spaces 19 are park-owned rentals, 15 are no longer covered by rent control, leaving 74 rent control spaces; Pacific: Only 2 spaces remain on rent control, 4 spaces are park-owned rentals, 55 spaces are no longer on rent control, and 1 management space; Rancho San Luis Rey: Of 433 total spaces, 25 are park-owned rentals [now collateral for the park owners' loan] (up from 17 the previous year); Royal Palms: Of 15 total spaces, 3 are vacant, 1 management space, leaving 11 on rent control; Sandy Shores: Of 44 total spaces, 12 are park-owned rentals, 12 are no longer on rent control, 1 vacant space; Terrace Gardens: Of 74 total spaces, 18 are vacant, 5 are park-owned rentals, 1 management space; Trico: Of 97 spaces, 11 are park owned rentals, 1 vacant; Westwinds: Of 92 spaces, 31 are not on rent control, 1 park owned rental, 2 vacant. Rancho Calevero (323 spaces, 4 management spaces) and Oceanview (29 spaces, 1 management space) remain under rent control.

## Urgent steps to be taken

1. The State of California needs new comprehensive rent stabilization laws to protect manufactured homeowners from predatory private equity investors.

Example: CA AB-3066, the Mobile home Residency Law Protection Program ("MRLPP") purports to give mobile homeowners a claim process through Housing & Community Development ("HCD") to resolve disputes (except for rental agreements/leases, etc.). Although all mobile homeowners throughout California are now annually paying $10 each for this "protection," MRL attorneys advise homeowners not to use the MRLPP for the following reasons: 1) the process sends the homeowner into mediation/arbitration, but doesn't say who pays for that. Arbitrators often charge $500/hr. Homeowners easily exhaust any monies they could have used to pursue civil legal remedies; 2) Arbitration waives the homeowners' right to obtain punitive damages; 3) the "claim" process gives HCD up to one year to "evaluate the claim" and determine if it has "merit;" civil statutes of limitations expire at the end of one year; 4) the majority of legal issues faced by mobile homeowners are time-sensitive: e.g. 3-day notices, unlawful detainer (5 days), 7-day notices (3 within 12 months can result in eviction); 5) even if HCD determines the homeowner(s)' claim "has merit," at the end of the one year, HCD then refers the homeowner back to "non-profit legal assistance" in their area. According to HCD's Mobile home Ombudsman, "non-profit legal assistance" is the homeowner(s)' local Legal Aid office, which the homeowner could have contacted without waiting a year to begin with. Further, with few exceptions, Legal Aid offices handle landlord-tenant law and have no attorneys who practice California Mobile home Residency Law, which is highly specialized and overlaps with real property, landlord tenant, elder law, health and safety laws, etc. The result is that the MRLPP delays the homeowner while their statute of limitation runs out, or they miss a legal deadline, it robs the homeowner of any punitive damages, and sends them in a 12-

month cycle back to attorneys in their area who don't know the MRL and can't help them, especially once their statute of limitations has expired. Who benefits? Park owners.

2. Cities throughout California, especially coastal cities, must pass comprehensive rent stabilization laws if they haven't already. Cities like Chula Vista passed "vacancy decontrol" instead, which was voted down in Oceanside. Vacancy decontrol, which purports to "phase out" rent protections, instead allows park owners to raise rents "without limit" if the homeowner lists the home for sale or leaves it to an heir. This has a devastating effect on the elderly and disabled who often need to urgently sell their home to enter assisted living or a convalescent facility. It also prevents their heir(s) from occupying a home they inherit.

3. Cities (like Oceanside) who have a rent stabilization ordinance must defend and enforce it. City officials and staff must make it a priority to know and understand local and state laws, including zoning, intended to protect these vulnerable populations and uphold them. Cities can no longer turn a blind eye to park owners who flaunt local business licensing requirements, ignore Code Enforcement, health and safety requirements, and file blank annual reports. Cities must make local communities their priority, rather than out-of-town billionaire investors.

4. Cities must enact new laws and ordinances that impose additional protections and close existing loopholes:

a) Revise language in existing Zoning Conversion Ordinances that gives a City Council majority the power to "reduce or eliminate" moving expenses or relocation fees for mobile homeowners if park owner(s) merely "claim" (rather than "prove") it would be a "financial hardship" for the park owner(s). [Park owners often move financial assets from one corporate entity to another, leaving the culpable entity without assets.]

b) Revise language that prohibits homeowners who have listed their home for sale from receiving any relocation or moving expenses in the event of park closure. [Park owners often bring in hostile management tactics, threats and intimidation to compel homeowners to list their homes for sale; then delay or prevent the home sale by failing to approve any buyer.]

c) Cities must educate new buyers of manufactured homes of local and state laws that protect them before they complete the purchase of a home. This could be accomplished by:

i) Requiring a copy of any rent stabilization ordinance to be attached to the home purchase documents, rental agreement or lease.

ii) Post city signs at park entrances alerting buyer(s) to any local rent stabilization ordinance with a city number to call for more information. Signs can be located outside along public sidewalks or easements just like other City ordinance signs.

iii) Hold workshops at city senior centers, libraries, etc. to educate manufactured home buyers and homeowners;

iv) Provide new home buyers with copies of local and state laws that apply: City ordinances (including zoning, senior overlay, etc.) the California Mobile home Residency Law (the "MRL") (CA Civil Code 798, et seq.) and California Code of Regulations (CA Title 25).

v) Revise cities' in-lieu fee provisions to increase fees and dedicate them for affordable housing rather than commingling monies with the general fund;

Cities can require separate agreements to compel developers to either build affordable units or donate a portion of their project land for installation of affordable (modular, manufactured homes). Developers would install utility hook-ups, water, sewer, and concrete pads. Mobile homeowners would purchase homes just as they do now and be responsible for property taxes, maintenance and utilities. Cities could create non-profit entities to manage new manufactured communities at fixed rents; home buyers would be means-tested (income qualified), thus allowing cities to count the units as “affordable housing” with the State. (the City of San Marcos has 3 non-profit mobile home parks). This could provide almost immediate affordable housing units. Manufactured housing also comes in ADU and “granny flat” sizes, as well as larger 2-story units that could house multiple families.

# Conclusion

Our cities, state, and nation are in a housing crisis of unprecedented proportions. If local governments and State officials are not urgently proactive to prevent further loss of rent controlled spaces, and increase the state's largest source of affordable housing stock, the homeless crisis we are already experiencing will become increasingly dire. More and more seniors, veterans, disabled, blind and mentally ill persons are at risk of losing the last form of housing they have. SANDAG predicts that 97% of the anticipated population increase in our area will be seniors over the age of 55. In preparing for this unique era, there needs to be consideration given to factors of this demographic shift aside from just the sheer numbers. The multitude of societal and economic factors that have coalesced over the last 40-50 years, put an increasing strain upon middle to low-income families as well as individuals. There are variables such as the increased lifespan, financial challenges, lack of retirement savings, lack of affordable housing, decreasing numbers of potential caregivers, smaller nuclear families, potential decreases in to government-funded safety nets, health care costs, and exploding costs for long term care that will require innovative community-based solutions to at least mitigate the burdens of the rising demand.

These solutions depend on local governments to uphold and protect existing space rent protection laws and create more affordable housing options for relocation of park residents as mobile home parks continue to be acquired by equity investors for development. If local City Councils are seduced by increased revenues from billionaire park owners instead of upholding local rent protections, the existing rent protection laws will continue to be undermined, the fabric of communities will be ripped apart, and an already dire affordable housing environment will be exacerbated creating thousands of catastrophic personal circumstance for San Diego seniors.

# References


1. 2022 California Mobilehome Residency Law (MRL) - HTML Version. MHPHOA. Accessed October 12, 2022. https://mhphoa.com/mrl/html
2. Kramon K. California's affordable mobile home Parks vanishing. Peninsula Press. https://peninsulapress.com/2015/03/11/mobile-home-parks-california/. Published March 20, 2015. Accessed October 12, 2022.
3. Data Spotlight: Profiles of older adults living in mobile homes. Consumer Financial Protection Bureau. Accessed October 12, 2022. https://www.consumerfinance.gov/consumer-tools/educator-tools/resources-for-older-adults/data-spotlight-profiles-of-older-adults-living-in-mobile-homes/
4. US Census Bureau. Older People Projected to Outnumber Children. The United States Census Bureau. Published December 3, 2018. https://www.census.gov/newsroom/press-releases/2018/cb18-41-population-projections.html
5. Health & Human Services Agency. San Diego County Health & Human Services Agency. https://www.sandiegocounty.gov/content/sdc/hhsa.html. Accessed October 15, 2022.
6. Data Surfer. SANDAG Data Surfer | Your go-to data warehouse for the San Diego region. https://datasurfer.sandag.org/.
7. Dunn A.S., Wilson E., Andres K. Redesigning the financial roadmap for the LMI 50+ segment. Financial Health Network. https://finhealthnetwork.org/research/redesigning-the-financial-roadmap-for-the-lmi-50-segment/. Published February 11, 2019.
8. Neuman T., Koma W, Jacobson G., Smith K. Medicare beneficiaries' financial security before the coronavirus pandemic. Kaiser Family Foundation. https://www.kff.org/medicare/issue-brief/medicare-beneficiaries-financial-security-before-the-coronavirus-pandemic/. Published April 24, 2020.

9. 2020 Social Security Changes. Social Security Administration. https://www.ssa.gov/news/press/factsheets/colafacts2020.pdf. Published 2020.
10. Iacurci G. Debt among oldest Americans skyrockets 543% in two decades. CNBC. https://www.cnbc.com/2020/02/26/debt-among-older-americans-increases-dramatically-in-past-two-decades.html. Published February 26, 2020.
11. Mutchler J, Roldán NV, Li Y. Living below the line: Racial and ethnic disparities in economic security among older Americans, 2020. ScholarWorks at UMass Boston. https://scholarworks.umb.edu/demographyofaging/46/. Published August 2020.
12. Syre S. UMass Boston report finds far greater rates of economic insecurity among older adults of color. UMass Boston. https://www.umb.edu/news/detail/umass_boston_report_finds_far_greater_rates_of_economic_insecurity_among_older_adults_of_color. Published September 23, 2020.
13. Median home prices Southern California. Los Angeles Almanac. http://www.laalmanac.com/economy/ec37.php. Published 2022.
14. Smolens M. For subscribers: Column: Yes, housing speculation is a big problem. San Diego Union-Tribune. https://www.sandiegouniontribune.com/columnists/story/2022-03-18/column-yes-housing-speculation-is-a-real-problem#_=_. Published March 18, 2022.
15. Schaul K, O'Connell J. Investors bought a record share of homes in 2021. see where. The Washington Post. https://www.washingtonpost.com/business/interactive/2022/housing-market-investors/. Published February 16, 2022. Accessed October 15, 2022.
16. San Diego, CA Rental Market Trends. RentCafe. https://www.rentcafe.com/average-rent-market-trends/us/ca/san-diego/.
17. Rental market trends in San Diego, CA. Rent. https://www.rent.com/california/san-diego-apartments/rent-trends.

18. Consumer Financial Protection Bureau, Data Spotlight: Older adults Living in mobile homes, 2022, https://www.consumerfinance.gov/about-us/blog/data-spotlight-older-adults-living-in-mobile-homes/
19. Kimberlin, Sara. California's Housing Affordability Crisis Hits Renters and Households With the Lowest Incomes the Hardest, California Budget and Policy Center, 2019, https://calbudgetcenter.org/app/uploads/2019/04/Report_California-Housing-Affordability-Crisis-Hits-Renters-and-Households-With-the-Lowest-Incomes-the-Hardest_04.2019.pdf
20. Khairzada, Zarina.Carson Mobile Home Park Residents Face Uncertainty due to Proposed Redevelopment. Carson, CA. Spectrum News. 2021 https://spectrumnews1.com/ca/la-west/housing/2021/08/02/are-we-seeing-less-and-less-mobile-home-parks-
21. Leighton, Ken. The Life and Death of Oceanside Mobile Homes, San Diego Reader, 2020, https://www.sandiegoreader.com/news/2020/jan/03/stringers-life-and-death-oceanside-mobile-homes/
22. Angst, Maggie. San Joes Mobile Home Park will be razed for a 700-Unit luxury housing development, Bay Area News Group, 2020 https://www.mercurynews.com/2020/01/16/san-jose-mobile-home-park-will-be-razed-for-a-700-unit-luxury-housing-development/
23. Khairzada, Zarina. Mobile Home Park Closure Brings Development , Displacement Fears for Seniors. Carson, CA, 2020 https://spectrumnews1.com/ca/la-west/housing/2020/10/28/mobile-home-park-closure-brings-development--displacement-fears-for-seniors
24. Gephardt, Matt and St. Clair, Cindy. Squeezed Out: As land values skyrocket, Mobile Home Parks Disappear, KSL TV 5, 2021 https://ksltv.com/476019/squeezed-out-as-land-values-skyrocket-mobile-home-parks-disappear/
25. Chong, Emily. Examining the Negative Impacts of Gentrification, Georgetown Law, 2017. https://www.law.georgetown.edu/poverty-journal/blog/examining-the-negative-impacts-of-gentrification/

26. Kolhatkar, S. (2021, March 5). What happens when investment firms acquire Trailer Parks. The New Yorker. Retrieved January 15, 2022, from https://www.newyorker.com/magazine/2021/03/15/what-happens-when-investment-firms-acquire-trailer-parks
27. San Diego Union-Tribune, Half of San Diego’s 70K ‘Affordable’ Rental Units Could Be Gone by 2040, Report Says, 2020
28. Arnold C. Why are investors buying up mobile home parks and evicting residents? NPR. https://www.npr.org/2021/09/03/1033910731/why-are-investors-buying-up-mobile-home-parks-and-evicting-residents. Published September 3, 2021. Accessed October 13, 2022.
29. Goulding SC. Huntington Beach mobile home residents ask for relief as conglomerates buy UP Parks. Orange County Register. https://www.ocregister.com/2022/06/17/huntington-beach-mobile-home-residents-ask-for-relief-as-conglomerates-buy-up-parks/. Published June 18, 2022. Accessed October 13, 2022.
30. Kasakove S. Investors are buying mobile home parks. residents are paying a price. The New York Times. https://www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html. Published March 27, 2022. Accessed October 13, 2022.
31. Garcia-Roberts G. The NBA 'superfan' who got rich fighting rent control. The Washington Post. https://www.washingtonpost.com/sports/2022/05/26/jimmy-goldstein-nba-fan-money/. Published June 7, 2022. Accessed October 13, 2022.
32. Ollie. De Anza Mobile Homes pushed out of Mission Bay. San Diego Reader. https://www.sandiegoreader.com/news/2011/sep/14/cover-trailer-park/. Published September 14, 2011. Accessed October 15, 2022.
33. Glynn C. Ten dogs found poisoned to death in San Diego trailer park. CBS News. https://www.cbsnews.com/news/ten-dogs-found-poisoned-to-death-in-san-diego-trailer-park/. Published April 19, 2011. Accessed October 13, 2022.

34. Pellejero S. Clos wrap up record year. The Wall Street Journal. https://www.wsj.com/articles/clos-wrap-up-record-year-11640637572. Published January 1, 2022. Accessed October 13, 2022.
35. Bhattarai A. Fewer hot showers, less meat: How retirees on fixed incomes are dealing with inflation. The Washington Post. https://www.washingtonpost.com/business/2022/03/21/elderly-inflation-fixed-income/. Published March 25, 2022. Accessed October 13, 2022.
36. McDonnell S. 'a difficult time adjusting' - seniors with fixed incomes feeling strain of rising prices. cleveland.com. https://www.cleveland.com/business/2022/05/a-difficult-time-adjusting-seniors-with-fixed-incomes-feeling-strain-of-rising-prices.html. Published May 18, 2022. Accessed October 13, 2022.
37. Spear B. Council post: What you should know if you're considering investing in Mobile Home parks. Forbes. https://www.forbes.com/sites/forbesrealestatecouncil/2020/03/02/what-you-should-know-if-youre-considering-investing-in-mobile-home-parks/?sh=1331acc77647. Published April 14, 2022. Accessed October 13, 2022.
38. Voice of San Diego. Manufactured Homes, no longer mobile, nor affordable. Voice of San Diego. https://voiceofsandiego.org/2006/07/03/manufactured-homes-no-longer-mobile-nor-affordable-2/. Published March 15, 2022. Accessed October 13, 2022.
39. Borland KM. Manufactured home capital demand soars during the pandemic. GlobeSt. https://www.globest.com/2020/11/05/manufactured-home-capital-demand-soars-during-the-pandemic/?slreturn=20220913165551. Published November 5, 2020. Accessed October 13, 2022.
40. Foroohar BR. Why big investors are buying up American trailer parks: Financial tim. CCRH. https://www.calruralhousing.org/single-post/2020/03/04/why-big-investors-are-buying-up-american-trailer-parks-financial-times. Published March 4, 2020. Accessed October 13, 2022.

41. Capital MP. Why mobile home park investments will thrive in 2021. Press Release Service & Global Newswire. https://www.accesswire.com/629641/Why-Mobile-Home-Park-Investments-Will-Thrive-in-2021. Published February 15, 2021. Accessed October 13, 2022.
42. Statewide housing plan. Statewide Housing Plan. https://statewide-housing-plan-cahcd.hub.arcgis.com/. Accessed October 13, 2022.
43. Master plan: 5 bold goals. Master Plan for Aging. https://mpa.aging.ca.gov/Goals/1. Accessed October 13, 2022.
44. Article 34 Mobile Home Park Conversions - Oceanside, California. https://www.ci.oceanside.ca.us/civicax/filebank/blobdload.aspx?BlobID=26044. Accessed October 13, 2022.
45. Park closure faqs: California Mobile Home Litigation attorney: San Diego. California Mobile Home Litigation Attorney | San Diego | Call 858-244-5032 to speak with an experienced San Diego, California, mobile home litigation attorney at Tatro & Lopez, LLP, who can protect your home. https://www.californiamobilehomeattorneys.com/practice-areas/park-closure-faqs/. Published April 1, 2021. Accessed October 13, 2022.
46. Power ER. Mobility-based disadvantage in older age: Insecure housing and the risks of Moving House: Ageing & Society. Cambridge Core. https://www.cambridge.org/core/journals/ageing-and-society/article/mobilitybased-disadvantage-in-older-age-insecure-housing-and-the-risks-of-moving-house/045B6E8935A08CE705A636F58E9C1DEE. Published July 3, 2020. Accessed October 13, 2022.
47. U.S. Department of Housing and Urban Development (HUD). Housing Choice Vouchers Fact Sheet. HUD.gov. https://www.hud.gov/topics/housing_choice_voucher_program_section_8. Published January 11, 2022. Accessed October 13, 2022.

48. U.S. Department of Housing and Urban Development (HUD). Multifamily housing - program description: Section 202 supportive housing for the elderly program. HUD.gov. https://www.hud.gov/program_offices/housing/mfh/progdesc/eld202. Accessed October 13, 2022.
49. Low-income housing tax credit programs. CTCAC Tax Credit Programs. https://www.treasurer.ca.gov/ctcac/tax.asp. Published 2022. Accessed October 13, 2022.
50. Shroyer A, Chen B. How manufactured housing can fill affordable housing gaps. Housing Matters. https://housingmatters.urban.org/articles/how-manufactured-housing-can-fill-affordable-housing-gaps. Published February 4, 2022. Accessed October 13, 2022.
51. Hansen L. Fierce, 7-year nimby battle in Palo Alto reaches a conclusion. The Mercury News. https://www.mercurynews.com/2020/06/23/fierce-7-year-nimby-battle-in-palo-alto-reaches-a-luxury-conclusion/. Published June 24, 2020. Accessed October 13, 2022.
52. Hadley S, Trechter D. Town of Woodmohr Comprehensive Planning Public Opinion Survey Report, 2008. UW Extension. https://minds.wisconsin.edu/bitstream/handle/1793/35157/Woodmohr.pdf?sequence=1. Published December 2008. Accessed October 13, 2022.
53. Livingstone S. Family homelessness and gentrification in San Diego. Scholars Strategy Network. https://scholars.org/contribution/family-homelessness-and-gentrification-san-diego. Published February 14, 2020. Accessed October 13, 2022.
54. Scommegna P. Study finds U.S. manufactured-home owners face 'quasi-homelessness'. PRB. https://www.prb.org/resources/study-finds-u-s-manufactured-home-owners-face-quasi-homelessness/. Published October 18, 2004. Accessed October 13, 2022.

55. Taylor L. Housing and Health: An overview of the Literature: Health Affairs Brief. Health Affairs. https://www.healthaffairs.org/do/10.1377/hpb20180313.396577/full/. Published June 7, 2018. Accessed October 13, 2022.
56. Sullivan E. Moving Out: Mapping Mobile Home Park Closures to Analyze Spatial Patterns of Low–Income Residential Displacement. SAGE Journals. https://journals.sagepub.com/doi/10.1111/cico.12252. Published September 1, 2017. Accessed October 13, 2022.
57. Durst N, Sullivan E. The contribution of manufactured housing to affordable housing in the United States: Assessing variation among manufactured housing tenures and community types. Taylor & Francis. https://www.tandfonline.com/doi/full/10.1080/10511482.2019.1605534. Published June 11, 2019. Accessed October 13, 2022.
58. Hadley S, Trechter D. Town of Woodmohr Comprehensive Planning Public Opinion Survey Report, 2008. UW Extension. https://minds.wisconsin.edu/bitstream/handle/1793/35157/Woodmohr.pdf?sequence=1. Published December 2008. Accessed October 13, 2022.
59. Griego T. Mobile Home parks become immigrants' home away from home. AP NEWS. https://apnews.com/article/immigration-parked-half-the-american-dream-mountains-co-state-wire-colorado-bdde441cd34d4992a1e0a5f6d3e8d094. Published September 15, 2019. Accessed October 13, 2022.
60. Brown L. Relocation stress syndrome. SDSU Extension. https://extension.sdstate.edu/relocation-stress-syndrome. Published June 2, 2020. Accessed October 13, 2022.
61. Health impacts of family housing insecurity - SFDPH. https://www.sfdph.org/dph/files/EHSdocs/ehsCEHPdocs/Housing_Insecurity_SFDPH_Report.pdf. Published February 2019. Accessed October 13, 2022.

62. Sanders A, Turner MS, Diehl M, Wang C, Kaldes P. Housing, older adults, health, inequities, policy. ASA Generations. https://generations.asaging.org/housing-older-adults-health-inequities-policy#:~:text=Research%20has%20found%20that%20people,2015%3B%20Braveman%20et%20al.%2C. Published March 12, 2021. Accessed October 13, 2022.
63. Smith GS, Thorpe RJ. Gentrification: A priority for Environmental Justice and Health Equity Research. Ethnicity & disease. https://pubmed.ncbi.nlm.nih.gov/32742156/. Published July 9, 22n.d.. Accessed October 13, 2022.
64. Latest APA survey reveals deepening concerns about connection between chronic disease and stress. American Psychological Association. https://www.apa.org/news/press/releases/2012/01/chronic-disease. Accessed October 13, 2022.
65. Lofholm N. Colorado tried to protect people who live in mobile home parks. A Gunnison community fell through the cracks. The Colorado Sun. https://coloradosun.com/2022/07/03/ski-town-village-mobile-home-park-gun/. Published September 1, 2022. Accessed October 13, 2022.
66. Pierce G, Gonzalez SR. Public drinking water system coverage and its discontents: The ... https://www.liebertpub.com/doi/10.1089/env.2017.0006. Accessed October 13, 2022.
67. Appendix A : https://docs.google.com/spreadsheets/d/1kbQlrOmUWWHuIvyq3dfX1mRVUpZF5k9F/edit?usp=sharing&ouid=116915027589076794253&rtpof=true&sd=true