

Mobile Home Parks: An Opportunity for Healthy, Affordable Housing

MARCH 2024

The Rhode Island Housing Resources Commission (HRC) published an in-depth review of the geography, regulatory frameworks, and policy issues of licensed mobile home parks in 2001.¹

In Rhode Island general law:

Mobile homes appear within Title 31 Motor and Other Vehicles. They are owned as “chattel” or a personal possession—similar to a car—not as real estate. Chapters 44, 44.1, and 44.2 define the rest of the legal framework, including state oversight by the Division of Business Regulations (DBR) and surveying by the Department of Health.

For legislators at the Rhode Island General Assembly, exploring ways to include mobile homes, and particularly mobile home parks, as “low- and moderate-income housing” (RIGL 45-53-3[8]) is a topic of discussion almost annually. However, the assumption that mobile homes are inherently an affordable housing option not subjected to the same skyrocketing costs associated with other types of housing is not always true. Due to the unique factors associated with mobile homes, consideration must be paid to several important measures before a mobile home is counted as “low- and moderate-income housing.”

First, it cannot be assumed that all mobile homes are affordable to low- or moderate-income households or that this demographic occupies them.

Affordability of Mobile Home Parks

“Affordable housing” is defined in RIGL 42-128-8.1(d)(1) as housing that costs less than 30 percent of a qualifying household’s income. For rental homes, the qualifying income must be less than 80 percent area median income (AMI), as defined by the U.S. Department of Housing & Urban Development (U.S. HUD), and for owned homes, the income must be less than 120 percent AMI.

Where the mobile home resides plays an important role in determining its affordability. Mobile homes can be placed on their own private parcels or within a mobile home park on a “pad” that is rented. While the former generally ensures that costs of the land remain stable to the owner, a mobile home that is sited within a park may be subject to dramatic increases in pad rent, quickly making an otherwise affordable housing option unaffordable. This, compounded by the fact that moving a mobile home from one park to another is often costly and impractical, the influence of pad rent on affordability cannot be understated.

Through prior research and licensing of parks by DBR, it can be reasonably estimated that there are 3,762 mobile homes in 46 parks.²

There is substantial diversity in the characteristics and geography of these parks, including those that are age-restricted, seasonal destinations with homes that serve as second or vacation homes. There are no mechanisms to ensure the measure of affordability nor to ensure that the households’ incomes qualify as low or moderate.

Second, is the quality of the homes themselves and the parks where they are located.

Mobile Homes and Manufactured Housing

Despite the popular use of the term “mobile homes,” there is formally a distinction between mobile homes and manufactured housing determined by federal regulations.

In 1974, U.S. Congress passed the National Manufactured Housing Construction and Safety Standards Act, and in 1976, U.S. HUD established regulations for these homes.³ These regulations helped set industry standards and, in some cases, enabled financing of homes by lenders under certain conditions.

Mobile homes that were built prior to U.S. HUD’s 1976 regulations do not meet these standards and cannot be considered manufactured housing.

Beyond the home’s standards, the quality of the parks themselves needs to be considered. Parks that are in rural settings without access to public water and sewer pose a concern regarding drinking water and proper sewage treatment.

Cooperative Ownership of Mobile Home Parks

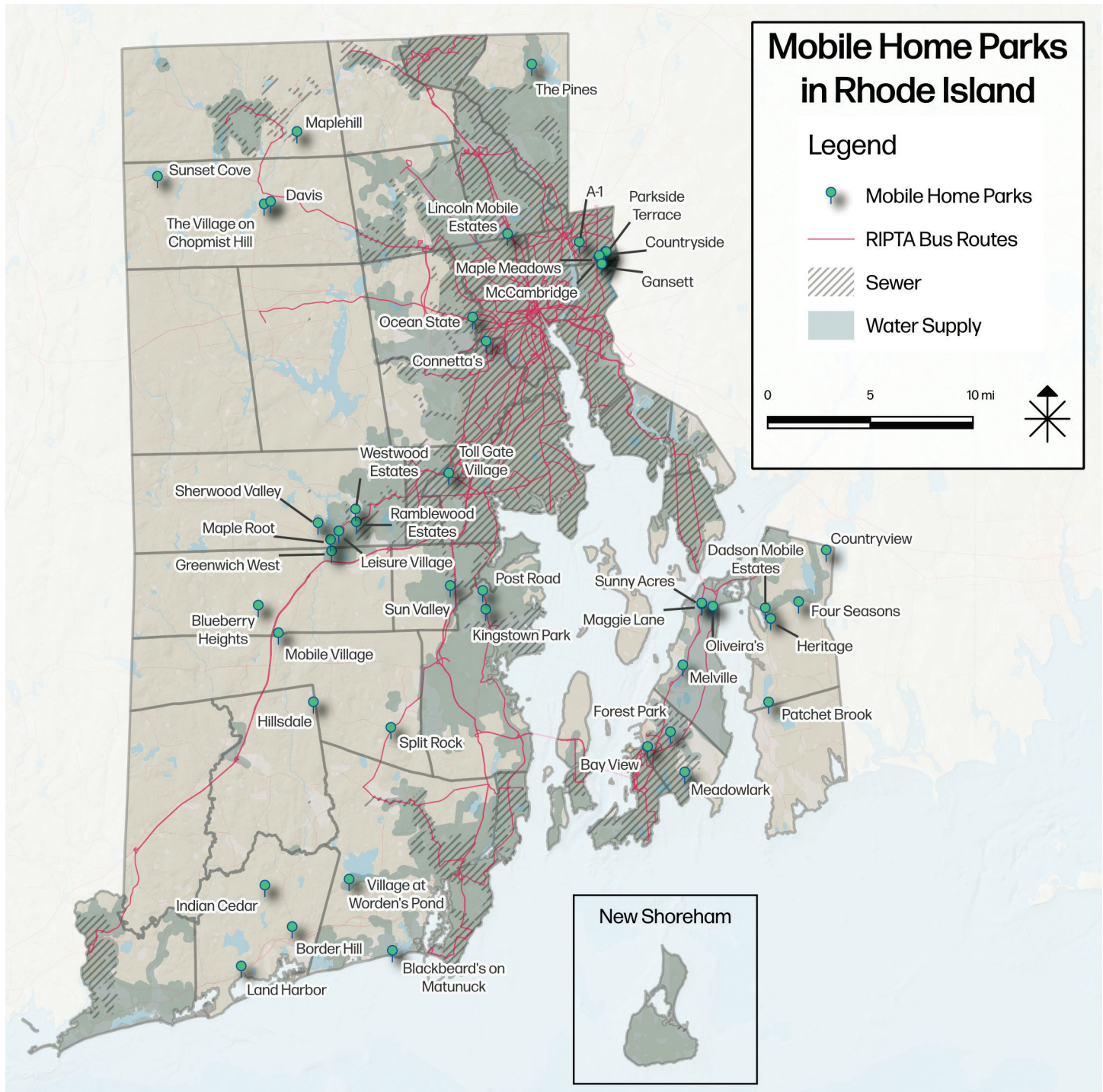
Across the United States, the most reliable way to ensure that mobile homes located within parks are healthy and affordable is cooperative resident ownership.

Housing advocates have raised this as a possibility for those legislators who would like to have mobile homes considered within the definition of low- and moderate-income housing. Resident ownership assures the health and longer-term affordability of the pad rentals to the mobile home owners. Though still not a subsidy that maintains the affordability, the cooperative ownership model mimics that assurance. Resident Owned Communities USA (ROC USA) is a non-profit organization that works with park residents when their parks become available for purchase. In Rhode Island, they work with the Cooperative Development Institute (CDI) to provide the technical assistance needed for the process.⁴

Due to the current affordability crisis, there has been a resurgence of interest in manufactured housing and resident-ownership of these parks in the last few years. The former represents significant cost-savings in building, the latter due to investors driving up costs and park closures, with subsequent loss of affordability.⁵

The Landscape of Mobile Home Parks

The following pages map and chart the known specifics regarding affordability, resident-ownership, and other pertinent factors regarding the mobile home parks known in Rhode Island, including if the number of homes licensed deviates from what was researched using the E-911 database.



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MUNICIPALITY	PARK NAME	# OF HOMES	COMMENTS
Burrillville	Maplehill Mobile Home Park	198	198 LMIH units
Charlestown	Border Hill	50	
	Charlestown Cedars (formerly Indian Cedar Mobile Home Park)	71*	
	Land Harbor Leisure Park	20	
Coventry	Leisure Village	70	
	Maple Root Village	184	178 LMIH units across Maple Root &
	Ramblewood Estates	200	Ramblewood
	Sherwood Valley Mobile Home Park	170	Resident-owned
	Westwood Estates	373*	
Cranston	Connetta's Mobile Home Park Residents Cooperative Association	60*	Residents Cooperative Association
Cumberland	The Pines Mobile Home Park	18	
East Greenwich	Sun Valley Manufactured Home Village	60*	
East Providence	Gansett MHP LLC	70	
Exeter	Barber's Mobile Home Park	140*	
	Split Rock Mobile Home Park ⁶	55*	
Gloicester	Davis Mobile Home Park	38	2 LMIH units
	Sunset Cove Mobile Home Park	10*	
	The Village at Chopmist Hill (RLM LLC DBA)	86*	9 LMIH units
Johnston	JCF Mobile Home Park (formerly Ocean State)	17	
Lincoln	Lincoln Mobile Estates	64	Resident-owned
Middletown	Bay View Mobile Home Park	94*	
	Meadowlark Park	28*	
	Forest Park (RIMI Forest dba Impact MHC Management LLC dba MHCA Homes)	82*	
North Kingstown	Kingstown Mobile Home Park (Kingstown Properties LLC DBA)	125	
	Post Road Mobile Home Park	137	
Pawtucket	A-1 Mobile Home Park	100*	
	Countryside Mobile Home Park (Mobile Home Rentals LLC DBA)	110	
	Maple Meadows Mobile Home Park	75*	
	McCambridge Mobile Home Park	5	
	Parkside Terrace Mobile Home Park	42*	
Portsmouth	Maggie Lane Mobile Home Park	9	
	Melville Mobile Home Park	122	
	Oliveira's (3279 East Main Road LLC DBA)	7	
	Riverview Mobile Home Park LLC	14*	
	Sunny Acres Mobile Home Park	137*	
Richmond	Hillsdale Housing Cooperative	106	Resident-owned
South Kingstown	Blackbeard's on Matunuck	0*	
Tiverton	Village at Worden's Pond (Tuckertown Village Park, LLC DBA)	230*	
	Countryview Estates	44	
	Dadson Mobile Estates	102	Removed from 2022 LMIH chart; 50 units
Warwick	Four Seasons Mobile Home Park	23	
	Heritage Home Park, Co-Op	38	Cooperatively owned
	Pachet Brook Mobile Home Park	8	
	Toll Gate Village for Senior Citizens	50*	
	Blueberry Heights Housing Co-Op	9*	9 LMIH units; Cooperatively owned
West Greenwich	Greenwich West	31*	

Total 3762

*E-911 data for number of homes deviates by at least 10%

Policy Recommendations

Whatever role mobile homes play in the percentage of long-term affordable homes, the nearly 4,000 Rhode Island households who occupy them deserve to be certain they are living in healthy homes. The following list represents outstanding issues and activities in need of coordinated action that would help inform the discussion and enhance the opportunity for better outcomes for these residents.

Research & Outreach

- A statewide mobile home park inventory with special attention on the status of resident-owned parks in Rhode Island, including creation of an online database with mapping of all parks.
- Expand the capacity of ROC USA and its regional technical assistance partner-Cooperative Development Institute (CDI) to support resident organizing, pre- and post-purchase assistance and research around mobile homes conversion and the elevation of mobile homes parks as an important source of affordable housing in Rhode Island.
- Encourage greater public awareness of the diversity of manufactured homes and mobile home parks as important assets of affordable housing.

Statutory & Regulatory Activities

- Explore statutory expansion of definitions of all manufactured housing types, and organization of “mobile homes,” specifically as chattel.
- Encourage more flexible regulatory approaches to the expansion of existing, licensed parks, including a review of land use/zoning regulations to expand and create mobile home parks.
- Revise the State’s First Right of Refusal law to provide adequate time to make an offer and notice of sale and/or conversion to the Rhode Island Department of Housing.
- Better coordinate the work of the Rhode Island Department of Business Regulation, which has regulatory responsibility over mobile home parks in Rhode Island with the new Rhode Island Department of Housing.

Financial Capacity

- Encourage the development of greater financial resources for mobile home parks such as: Developing financial resources for infrastructure repairs; developing more affordable mobile home financing options for purchase and refinancing; and provide resources to mobile resident groups and non-profit organizations for mobile home park conversion to resident ownership.
- Explore resources for relocation of residents due to a park closure in the event of a change in use of the land.

Housing & Park Quality

- Develop an action plan for the disposition of older homes as it relates to replacement costs and removal.
- Ensure timely inspections and verification of the quality of drinking water and adequate sewage treatment for those parks not connected to public infrastructure.

Endnotes

1. HousingWorks RI is very grateful for the significant contribution to this report by Ray Neirincx, Coordinator of the Office of Community Development for the RI Housing Resources Commission, and his longstanding work regarding Rhode Island’s mobile home parks, including the 2001 HRC brief https://d337wih8hx5yft.cloudfront.net/documents/2001_RI-MobileHomeBrief_06222017.pdf.
2. Mobile home park names do not always align with license names listed in DBR. Along with historic park names from 2001, HousingWorks RI emailed municipal planners, consulted with CDI, and cross-referenced licenses listed by DBR, which sometimes cover multiple parks. HWRI cross-referenced CDI and DBR information with Rhode Island E-911 data to derive accurate park locations and mobile home unit counts. Lastly, a private “online marketplace,” <https://www.mhville.com/parks/ri>, was also used as a resource when other sources conflicted.
3. For detailed information, please see: https://www.hud.gov/topics/hud_homes/manufactured.
4. For more information about both organizations, please see: <https://rocusa.org> and <https://cdi.coop>.
5. For further reading: Herbert, Christopher et al. Comparison of the Cost of Manufactured and Site-Built Housing (Harvard University Joint Center for Housing Studies, July 2023); Sullivan, Esther. Manufactured Insecurity: Mobile Home Parks and Americans’ Tenuous Right to Place (University of California Press, 2018); O’Hara, Mary. Testimony Before the Appropriations Subcommittee on Transportation, Housing, and Urban Development Agencies, U.S. House of Representatives, May 26, 2022; American University Radio (WAMU 88.5). “What happens when private equity takes over mobile home parks,” May 10, 2022; Greenstein, Linda. “A mobile home can be where the heart is,” Boston Globe, July 21, 2022.
6. Status unclear; see municipal action taken, 3/7/2022: https://www.exeterri.gov/sites/default/files/fileattachments/town_council/meeting/3654/pub_hrg_-_show_cause_-_split_rock.pdf.