



A Resource of the State of Florida

**HURRICANE LOSS REDUCTION
FOR
RESIDENCES AND MOBILE HOMES
IN FLORIDA**

**A Research Project Funded by
The State of Florida Department of Community Affairs
Through Contract 01-RC-11-13-00-22-004**

PRELIMINARY REPORT ON
LAND DEVELOPMENT AND ZONING ISSUES

DELIVERABLE # 4
DUE BY MARCH 30, 2001

PREPARED BY
THE INTERNATIONAL HURRICANE CENTER
FLORIDA INTERNATIONAL UNIVERSITY

PURPOSE

This report provides preliminary information on and analysis of various land development, zoning, and other regulatory issues as well as socioeconomic factors that may affect the viability of mobile home parks either negatively or positively. The emphasis of the report is on those factors that may result in adverse impacts on mobile home parks or that may increase the vulnerability of mobile home park residents to loss or damage from hurricanes. This report addresses one specific research track under a project titled “Hurricane Loss Reduction for Residences and Mobile Homes in Florida.”

The matter of *hurricane loss reduction* for housing involves a complex array of interacting factors ranging from the physical and structural, the actual and the perceived, to the regulatory and social. Consequently it is important to lay a foundation of knowledge specific to those factors mentioned above that will contribute to our understanding of how they may exacerbate the potential for hurricane loss.

This report is the result of contributions by researchers and staff at the International Hurricane Center (IHC) and researchers at Florida Atlantic University (FAU) and at the University of South Florida (USF). The High Performance Database Research Center at Florida International University (FIU) also contributed to this effort.

The methodology used to create this report included the following: a) Review of literature including various statutes and regulations at the state, municipal and county levels, b) Visits to various mobile home parks to assess the beneficial or adverse consequences of the various factors mentioned above, c) Documentation via digital photography of pertinent site-specific factors that may affect the issue of hurricane loss, d) Review and analysis of high resolution aerial photography/satellite imagery depicting various mobile home parks and their surrounding vicinities to assess socioeconomic forcing and responses, e) Review and analysis of other data or information sources and preparation of summary reports of findings, f) Interviews/survey of County and local planners and building/zoning officials, and g) Preliminary identification of alternatives for mitigating adverse impacts.

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This report has been prepared in compliance with the deliverable requirements of DCA Contract Number 01-RC-11-13-00-22-004 executed September 8, 2000 and modified through Amendment #1 executed January 18, 2001. This report specifically complies with Deliverable #4 of said contract, due by March 30, 2001, which reads as follows:

By March 30, 2001, the Contractor shall submit in both hard-copy and electronic format a preliminary Report on land development and Zoning Issues. The preliminary Report shall include the Identification and Analysis of Alternatives that would mitigate current negative economic and regulatory impacts on mobile home parks.

A WORK IN PROGRESS

As required this is only a preliminary report. While some hurricane loss contributing factors have already been identified, and some analysis has taken place, the issue of how negative impacts may be mitigated requires further analysis and surveys. This is especially true for mitigation measures that may require policy-decisions at the legislative level through the rules and regulations of various agencies.

The intention is to arrive at a comprehensive report by the end of the research period, on June 30, 2001, under present funding. Additional work will be required, during the second year of this research effort, to test the effectiveness and public acceptability/viability of various mitigation alternatives that may create a foundation for potential policy decisions at the state government level.

AN INTEGRATED APPROACH IS NEEDED

While this preliminary report addresses only one of five research tracks in the *Hurricane Loss reduction for Residences and Mobile Homes in Florida* project it is already apparent, from the research being conducted, that these five tracks are addressing issues and arriving at findings that are linked to a large extent. For example: some rules and regulations affect how mobile homes are installed, but non-compliance with other regulations either because of ignorance or non-enforcement may affect how mobile homes are remodeled, retrofitted or in some way modified. These activities in turn may have an effect on the structural integrity or on the potential for hurricane damage on these units, which may eventually reflect on issues of insurance and others.

Because of this environment of interrelated issues it is important to approach this project in an integrated fashion where it is important to understand, or even highlight, the fact that relevant activities or issues are not happening in isolation or independently from other activities and issues. There exists a dynamic process where several factors may be concurrently at work, at any given time, in affecting the issue of potential hurricane loss or damage. Consequently an integrated approach will be used in the course of this research.

It is also important to keep this integrated approach in mind while reading this preliminary report on land development and zoning issues. This is not a stand-alone report, but rather one of several that will be produced to provide a comprehensive integrated view of specific areas of concern.

LAND DEVELOPMENT AND ZONING ISSUES

Land development and zoning as tools of comprehensive community planning have the potential for impacting mobile homes and mobile home parks. The consequences of such impacts may be adverse or beneficial depending on specific cases.

The capability of land development and zoning regulations for affecting mobile homes results in part from the role this regulatory mechanism plays in shaping land use, growth, economic development, public welfare and safety, and the character of communities, in fact the very essential quality of life in a community.

Initial research has led the IHC/SUS research team to the identification of several specific land development and zoning factors affecting mobile homes. These factors can be grouped into two main categories:

- A. Sector-specific land development and zoning statutes enacted to directly address mobile homes, and
- B. Land development and zoning issues that affect the community at large surrounding mobile home parks creating indirect and/or consequential impact on the same.

This preliminary report provides information on both types of affecting factors in two ways: a) by listing sector-specific examples within the main body of the report, and b) through three case studies, looking at community-wide issues, attached to this preliminary report as Appendix A.

These affecting factors can be viewed as *forcings* that the land development and zoning regulatory environment places on mobile home communities, while the actual impact on such mobile home communities and their reaction can be considered as *feedback*.

What is important from the perspective of this research effort is to analyze the *forcings-feedback* interaction to assess what beneficial or adverse consequences may affect mobile homes.

Examples of Sector-specific Forcing

a) Restriction on Location of Mobile Home Parks

Regulations directly restricting the location of mobile home parks include the following two types:

i) Mobile Home Districts

Some local governments in Florida have established *mobile home districts* under their Land Development Regulations in order to restrict the location of mobile home parks within their municipal boundaries.

ii) Exclusive Areas

Other local governments have enacted Land Development Regulations that exclude mobile home parks from specific areas.

Although further analysis and more data may be required, the initial assessment of the IHC research team is that both these types of location-restrictive regulations may have beneficial consequences for mobile homes.

Main reasons for such initial assessment are:

- I. Special mobile home districts appear to locate mobile home parks within vicinities that are by and large homogeneous with respect to socio-economic factors. This results in mobile home communities that appear to be well integrated with their surrounding communities. In turn this would appear to avoid the type of external

socio-economic forcing that has adversely affected other mobile home communities throughout the state.

- II. The designation of areas that exclude the location of mobile home parks is usually done to prevent mobile homes from being installed within the more hurricane-vulnerable coastal area. The higher hurricane winds, flooding and storm surge that are prevalent in coastal zones would place mobile homes at a higher potential from hurricane damage than those located in most other locations.

b) Architectural – aesthetic Requirements

Preliminary findings from the interviews of planning and building and zoning officials in several municipalities appear to indicate some local jurisdictions may have enacted special requirements to regulate the architectural or aesthetic character of mobile home siding, or roofing or the expansion/remodeling of the same.

Obviously there is a need for additional research and analysis into these findings especially with regard to the issue of the uniform and non-discriminatory application of regulatory statutes.

c) Special Zoning Requirements

Through the same interview methodology there are initial findings that appear to indicate some municipalities may have enacted stringent norms for mobile home parks regarding set-backs, lot frontage, side-yard minimum, additions etc. While additional research is still needed to assess the type of impact these regulations may have on mobile homes, it is important to note that the building and zoning officials and planners that were surveyed felt it is an issue that should be looked into.

d) Growth Restrictions

Some communities have, over time as part of their growth regulation process, changed zoning regulations or land designation in communities around a mobile home park preventing any expansion of the park.

Additionally these changes in zoning typically permit a mix of other uses including commercial and/or industrial creating a surrounding environment that may make the mobile home park unattractive to potential tenants or buyers of mobile homes.

e) Deed Restrictions

This research effort has discovered at least one example of another type of regulatory forcing affecting mobile home. It has to do with *planned communities* and *deed restrictions* for the type of development that would be allowed in such a community. Such deed restrictions are usually written by the developers of the planned community and become part of the charter for the political entity, i.e.: city, village, township etc.

The specific example referred to above is of deed restrictions that became part of the founding charter of a local municipality in South Florida. These deed restrictions directly address the development of mobile home parks within city limits.

At this time further analysis is needed to understand what type of impact such deed restrictions may have had on mobile homes, other than just excluding the location of mobile homes within a particular community. It would be necessary to look at a combination of several factors, including socio-economic, with respect to the character and activities of the specific community, in order to determine whether this forcing has had adverse or beneficial consequences for mobile homes.

It is also important to conduct additional research to determine if these deed restrictions are an isolated case or if there are other such cases throughout the state.

f) Annexation Consequences

As urbanization has grown in Florida new municipalities have been incorporated while other developed areas have remained *unincorporated*.

There is also a continuous process by which counties are incorporating previously unincorporated communities to adjacent municipalities through the mechanism of *annexation*. In other cases existing municipalities request or

promote the annexation of adjacent unincorporated communities in an effort to increase the size, population and tax base of their existing communities.

This process of annexation has created perhaps unintentional, but real problems and adverse consequences for mobile home parks. The problem results from mobile home parks located in previously unincorporated areas that have been annexed to existing municipalities, where local zoning ordinances restrict mobile home parks in a variety of ways. In some cases such mobile home parks have been declared *non-conforming* in their new jurisdiction and, as a consequence of this, are prevented from expanding or being modified in any way. This may result in economic hardship for the park owners leading to other types of problems.

Initial findings by the IHC research team may indicate that compromising the economic viability of a mobile home park, especially when combined with changes in the make-up and character of the surrounding community and such other factors as a preponderance of rental units, and absentee park ownership, may often lead to a deterioration of the physical plant within the park, which may in turn lead to neglect in the maintenance of the units themselves and eventual abandonment and closure of the park itself.

With respect to the issue of hurricane loss and the objective of loss reduction these findings would appear to support some early intuitive conclusions, as follows:

- i) Economic problems, arising from whatever cause, that may result in deterioration of mobile homes, or eventual abandonment or even closure of a mobile home park, are in fact creating an added hazard during the impact of recurring hurricanes. This hazard is in the form of an increased potential for wind-propelled debris that could increase the potential for damage in the immediate vicinity of the park.
- ii) These abandonment/closure events lead to a displacement of population, which may create a housing problem, but also increase their vulnerability to hurricanes and other hazards.

g) Damage Recovery

There appear to be restrictions in the use of Federal or State funds for the repair of mobile homes that may have been damaged during hurricane events. While further research is required to understand all of the facts and issues involved, one early intuitive assessment would be that this may constrain the recovery of damaged mobile home parks making it more difficult to maintain or upgrade. Eventually these restrictions in use of funding may contribute to the degradation of mobile home parks leading to some of the adverse consequences already mentioned in this document.

Should these consequences involve the abandonment of mobile homes and the eventual closure of mobile home parks, the issues of housing problems, increased vulnerability of displaced population and the potential for increased probability for flying debris during hurricanes, would be highly relevant.

OTHER REGULATORY ISSUES

There are at least two other types of regulatory forcing with the potential for creating adverse consequences on the mobile home sector, that merit a closer look and analysis; these are described below:

a) Zoning Process

The zoning process is a tool to manage urban growth, population density, the quality of life in a community etc. The process is continuously being used to balance the demands/needs of specific interests versus those of others and those of the community at large.

Often there may be competing development proposals for the rezoning of specific land. Initial findings appear to indicate there may be more strict scrutiny, by the pertinent authority, of such rezoning applications when a mobile home park is one of the proposed development projects. It seems this results from concerns with liability issues based on a perception that manufactured housing may present a greater liability than other housing options.

While this is based on opinions expressed by local officials interviewed during this research effort, it seems there is an issue that would require additional research to fully understand what its real impact on mobile homes may be.

b) Permitting – Inspection Process

The existing regulatory structure is clear with respect to the agencies having jurisdiction over various phases of manufactured housing in Florida, and also with respect to the jurisdictional hierarchy starting with HUD and going through the state and local authorities.

The various phases mentioned above include: a) design, b) manufacturing, c) transportation, d) installation, and e) repairs and remodeling. The first two, design and manufacturing are the exclusive jurisdiction of HUD either directly or through state agencies on which HUD has delegated specific enforcement duties.

The installation of mobile homes comes under the direct and exclusive jurisdiction of the state, although a *building permit* issued by the *local* building authority is required prior to the installation.

Some level of ignorance or confusion appears to be present with regard to the repair or remodeling (modification) of mobile homes and what agency or agencies may have jurisdiction over the process. Even though state statutes contains specific regulatory language (Rule 15C) addressing the modification or remodeling of mobile homes, confusion and ignorance remain a significant problem.

This confusion has induced a climate of non-enforcement or of non-compliance with the permitting process designed to regulate the remodeling or modification of housing units.

As an example of this the following is offered: most counties and municipalities in Florida have an established process, often mandated by applicable building codes, requiring permits for any work on a dwelling (or any building for that matter) when the cost of such work exceeds a given threshold. In some cases the permit is required for any work that exceeds \$100 in value, in others it may be as high as \$500. In theory this process of building permits and an associated

process of inspections should ensure compliance with codes and standards, but also a safer environment in cases of hurricanes and the potential for damage.

This research effort is providing evidence that said permitting process may not be working as intended with respect to mobile homes. The evident result appears to be that there are large numbers of mobile homes that have been remodeled or otherwise modified first without having obtained the required building permit, and secondly placing these dwellings in violation of state statutes.

Rule 15C-2.0081 in Florida statutes is also known as the *Mobile Home/Manufactured Home Repair and Remodeling Code*. The stated objective of this rule is “to assure safe and livable housing”. The language quoted below is part of this rule:

(a) Additions, including, but not limited to add-a-rooms, roof-overs and porches shall be free standing and self-supporting with only the flashing attached to the main unit unless the added unit has been designed to be married to the existing unit. All additions shall be constructed in compliance with state and locally adopted building codes.

On site inspections to several mobile home parks throughout South Florida, by members of the IHC research team, appear to show the majority of mobile homes have been remodeled or added to often in violation of the specific language cited above. Also, informal non-scientific interviews with some residents of these mobile home parks may indicate most of that work has been done without applying for or receiving the required building permit.

The result, documented in this report by numerous pictures contained in *Appendix B*, is a collection of what may be characterized as *hybrid* housing units, where one part is the original mobile home and the other is a collection of additions that may go from a simple porch to several rooms.

In the majority of the cases, if not all, the additions were directly attached to the mobile home (see Figures 03, 04, 05, 06 etc. in Appendix B). Most of the many examples documented so far show conditions where the character and design of the original mobile home has been substantially altered.

The main concern with this situation is the increased vulnerability to potential damage under hurricane conditions resulting from the joining of two or more structures not specifically designed as a unit, and the quality (or lack) of structural workmanship used in these projects.

Above all there should be concern about the failure of a regulatory structure that has resulted in this vulnerable condition for numerous mobile homes. In this regard it must be emphasized that while these findings are based on visits to just seven or eight mobile home parks, the preponderance of the conditions described here is such that it may appear to be the norm rather than the exception.

The IHC research team will continue documenting this specific area of concern with the objective of assessing the magnitude of the problem presented by this condition.

ECONOMIC ISSUES

Interviews with planners in several municipalities in South Florida appear to indicate the real estate market conditions in this region may stand as one of the biggest barriers to the development and/or expansion of mobile home parks. The value of land, now at a premium in these highly developed counties and municipalities, is not an incentive for developers to pursue mobile home park development.

On this same issue the IHC research team has discovered at least one example of mobile home parks that have been demolished, or at least curbed in their future expansion, in order to use valuable land for a highly profitable commercial development. The key to this example is to be aware of the fact that both the mobile home parks and the commercial development that was eventually implemented belong to the same owners. Clearly this was a choice between alternatives, where the mobile home park became the least desirable.

On the opposite side of this issue, one of the case studies (please see Appendix A) that is part of this report shows one example of a large (900+ lots) mobile home park that is well integrated with its surrounding community and highly successful as a business venture, with almost no vacancies, a resident population almost exclusively of owners rather than renters, and a well maintained pleasant physical plant. The owner of this park indicated he has refused several offers to purchase the park and did in fact

indicate a desire to expand the park if it were possible (there is no available undeveloped land surrounding the park).

An early conclusion to be drawn from this is that while the value of land is certainly an important factor affecting mobile home parks, it also appears to be true that several other economic factors may be at play that actually benefit mobile home parks

MITIGATION

Because of the very tight time constraints under which this research is being conducted the IHC research team has not had much time to complete in-depth analysis of all the data being collected.

There are initial conclusions that may be reached, but often these early answers are intuitive in nature and must be complemented with more data and further analysis.

The same is true regarding the identification of mitigation alternatives to reduce the potential for adverse consequences stemming from some of the forcings mentioned herein.

One area for potential mitigation appears to lay in further analysis of the regulatory process with the objective of identifying the specific areas where and why it has ceased to meet its intended objectives.

Another potential area to contribute to mitigating the potential for hurricane loss may involve educational and outreach programs targeting mobile home owners. The objective would be to provide them with information they would use to fulfill their desire to improve their mobile homes (both in appearance and size) while being cognizant of the structural issues leading to increased vulnerability, and the need for working within a regulatory system designed for their protection.

At this time it is apparent the IHC research team will need more time to identify and analyze potential mitigation alternatives.

APPENDIX A

CASE STUDIES

While it is important to research and analyze the regulatory environment that creates and generates the land use and zoning environment for mobile home parks, it is equally as important to look in depth at how these regulations play out in specific contexts on the community level. This section of the preliminary report focuses on three case studies from the Miami-Dade County metropolitan area. These cases show three distinctive land development and zoning scenarios where both long term and short term planning decisions have had both positive and negative consequences on mobile home parks.

Case study 1 centers around Lil Abner Mobile Home Park in Northwest Miami-Dade County. The focus is on the positive consequences of planning decisions where mobile home parks fit into the surrounding community. Most important it shows that community support for affordable housing options lends itself to positive outcomes.

Unlike Case Study 1, the second case study shows the consequences of transitioning communities. This case study is in the northeastern section of Miami-Dade where the surrounding community is developing and leaving the mobile home parks behind. Economic pressures from development geared towards upper income households are slowly forcing mobile home parks in this area to give in to the economic pressures.

Bell Haven Mobile Home Park is the focus of Case Study 3. Bell Haven was in the northwestern area of Miami-Dade County. Having changed ownership in 1998, it closed its doors within the last 6 months after a prolonged legal battle with homeowners fighting eviction orders. While community conditions seemingly would support a mobile home park, the degradation of the park itself contributed to the economic pressures that led to its closing. It is a clear example of how urban blight and park conditions combine to pressure parks out of existence.

These cases help to illustrate what happens when land development and planning ideas go into practice, with both negative and positive outcomes. These illustrations are just a few examples of how communities are developing and changing in the State of Florida.

**Case Study 1:
Lil Abner Mobile Home Park
11239 NW 4th Terrace
908 Lots**

Lil Abner Mobile Home Park represents a good case study to investigate land use and planning that mitigates economic and social pressures often felt by mobile home park owners. Whether by design or by circumstance, Lil Abner fits in with the surrounding community, and as such, almost seems immune to pressures other mobile home parks experience. Lil' Abner mobile home park is located in Sweetwater towards the western side of Miami-Dade County, just south of the Dolphin Expressway, and just east of the Florida Turnpike.

Lil Abner has residential areas to the east and west. Map 1 shows the size of Lil Abner and begins to put the park in the larger community context. Towards the northwestern section of the park is the community center and swimming pool. The park was developed in two stages. The main area was developed in 1969 with an addition in 1980. While it is often thought that people bring mobile homes into parks, Lil Abner is not managed in such manner. In 1969, the park owner bought all the mobile homes, and then sold them to those who wanted to live in the park. When the newer section was developed in the early 1980's, once again the park owner bought the mobile homes and one by one sold them to homeowners. Today, this method of management continues. If a mobile home is removed from the park for any reason, the park owner replaces it, and then sells. The park has 100% occupancy. It is important to note, however, that units rarely are removed. About 25 were lost in Hurricane Andrew, but in the last 25 years, less than a handful has actually been removed.

Lil Abner is situated in a relatively homogenous community. Low to middle income residential areas are in the immediate surrounding neighborhoods with appropriate shopping areas to meet the needs of this community. Map 2 helps to illustrate the immediate surrounding community. As can be seen, the immediate neighborhood is predominately low to middle income residential. The exception to this is the Florida International University Engineering Campus to the east of the mobile home park, and a small commercial area to the northeast. FIU Engineering is a relatively recent addition to community. About five years ago, FIU took over the building from a commercial use. The engineering campus fits well in the community offering students reasonable housing alternatives while the engineering campus itself helps surrounding retail sales.

Looking at an even wider community picture as seen in Map 3, Lil Abner Mobile Home park fits well in the even larger community context. The area even in this context is mostly low to middle income housing with retail to support those living in the area. The largest employer in the area is the main campus of Florida International University which is a little over a mile south of the mobile home park.

The area to the west of the Florida Turnpike and north of the Tamiami Trail is the only section in the area with any type of development, and this development is exclusively residential development. The further west you move from Lil Abner, the more expensive the homes. The Florida Turnpike in a sense is a dividing line with those homes closest to the Turnpike lower in value, and those further away higher. Retail areas line the south side of Tamiami Trail, and no new retail development is underway. Even looking at Map 3, the mobile home park does not look out of place.

The area is clearly an excellent example of long term planning consideration. Decisions were made in the surrounding community that maintained the overall socio-economic status of the area. As such, the mobile home park owners feel little pressure to sell their park despite frequent offers. The park blends into the surrounding community. With little remaining open space, it is hard to imagine any new development considerably altering the overall nature of the community.

If zoning and planning remains constant in the area, any future pressure the park may feel should be mitigated. The economic viability of the business mitigates the pressures to sell the land. This success, in part, results from good park management where units are not allowed to deteriorate into disrepair. This case study illustrates many of the issues addressed in this report, and specifically, how planning and economic viability mitigate pressures often felt by mobile home park owners.

INSERT MAP #1

INSERT MAP #2

INSERT MAP #3

Case Study 2
Aventura Mobile Home Parks
West Dixie Highway Between 197th and 200th Streets
Coes Mobile Home Park : 28 lots
Dixie Mobile Home Park : 47 lots
Landmark Mobile Home Park: 48 lots
Lone Pine Mobile Village: 241 lots
Sun Haven Mobile Home Park: 78 lots

In the Aventura area of Miami-Dade County a group of five mobile home parks are the area in question. These mobile home parks range in size from 28 to 241 and are located in an area of economic transition. This growth continually applies economic pressures to these parks. Unlike Lil Abner in the first case study, the community around these parks is not complimentary to continued support of this type of housing.

As Map 4 illustrates, the group of mobile home parks are located along West Dixie Highway. At this juncture, West Dixie Highway parallels Biscayne Boulevard (also known as US1), but is separated by active train tracks. Immediately to the east of the parks is Aventura Mall. Aventura Mall is a high-end shopping mall that is anchored by some upper end retailers such as Macys, Bloomingdales, and Lord and Taylor. However, JCPenneys and Sears attempt to balance the mall plan. For the most part though, Aventura Mall caters to upper end shoppers. Most important is its continued growth. In the last 2 years the Mall has added significant shopping footage and entertainment space.

The entire area to the east of the mobile home parks is characterized by shopping. Both to the north and south of Aventura Mall is shopping areas. Further to the east (east of both the Mall and the mobile home parks) as the mainland approaches the Intercoastal waterway is a major resort including a golf course. Map 5 emphasizes the greater context of the area. As can be seen, single-family housing is to the west of the mobile home parks.

The best overall picture of the area is available on Map 6. The group of mobile home parks is at the center of the map. To the east, both north and south, is a combination of high-end shopping and high income residential areas. Property on the water, whether on the Biscayne Bay or the Intercoastal Waterway, is premium in South Florida. The dark patches on the map are substantial bodies of water.

Housing to the west of the mobile home parks begins at around \$200,000 with the upper end approaching \$1.5 million. Additional high-income residential areas are to the northeast of the mobile home parks. Key is that this is a developing area with both new residential and commercial development. As such, affordable housing areas are slowly but surely becoming obsolete. Only a small patch of affordable residential areas remains to the south of the mobile home park area. This area, once known as Ojus, is

transitioning as the surrounding neighborhood continues to develop to cater to the needs of those living in the high-income residential areas.

The mobile home parks continuously feel the economic and social pressures of the surrounding areas. In fact, the future of these parks is somewhat tenuous considering plans are underway to widen West Dixie Highway. In addition, there has been some talk of the developers of Aventura Mall wanting to build more shopping in the area, and the prime location would be the area of the mobile home parks.

How long these mobile home parks could resist opportunities to sell is unknown. However, as property values continue to rise in the area, the pressure will continue to grow. While the large 241 lot park, might have some economic incentive to continue as a mobile home park, it is easy to see how the 4 small parks could easily be lured to sell.

Unfortunately, it is hard to imagine any way to mitigate what seems to be the inevitable demise of this park area. Development decisions made long ago are already at play, and it would be impossible to stem the tide at this point. By allowing the development of high-end residential properties in the surrounding areas, planners have put a course of action in motion. To meet the needs of these residential areas, the surrounding community adapts and alters to meet the needs of those with the most money. As a result, economic incentive pushes landowners to sell. This sale puts an inevitable cycle in to play.

This area is a perfect example of a somewhat short-sited planning process. While decisions were not necessarily made regarding the mobile home park area, by developing the surrounding areas in a certain direction, the parks become, in a sense, a sore thumb in the area. They no longer fit into the surrounding community, and over time, the parks will find it harder and harder to resist the pressures to sell to large developers who will build more high end shopping to meet the growing communities needs and desires.

To mitigate this inevitable process, a more holistic approach to long-term planning is vital. More than that, however, communities must first value affordable housing options, and want to preserve them. With out this basic principle, pressures will continue to negatively impact mobile home parks.

INSERT MAP #4

INSERT MAP #5

INSERT MAP #6

Case Study #3
Bell Haven Mobile Home Park
3200 NW 79th Street
430 Lots

Bell Haven Mobile Home Park was located in the more northwestern section of Miami-Dade County between Miami and Hialeah. While once a large and vibrant park, over time, it came into severe neglect and degradation. The *Miami Herald* (August 4, 2000) reports that the park changed ownership in 1998 for \$2.1 million. However, shortly after the sale, the new owners realized that the park would never make a profit. Following State of Florida law, the owners notified park residents of the park closing over a year before the doors were to be closed. While the Herald reports that many residents complied with the eviction order and moved, some filed lawsuits to dismiss the eviction action.

During the last year, the majority of the residents left as required, but the Herald reports close to 100 families did not have the means to relocate. However, even though some mobile homes were still inhabited, the park owner began to disassemble units leaving debris strewn about the park. Living conditions continued to get worse as the lawsuit to overturn the eviction continued. Figures 35 through 38 in Appendix B show pictures of Bell Haven as it was undergoing its final demolition during March 2001. The new park owners argue that the park would have required millions of dollars worth of renovation. As of the August 2000 writing of the Herald article, no definitive plans were set for the development of the Bell Haven land. One option seems to be a low-income housing project.

Map 7 shows an aerial view of Bell Haven from 1995. Unlike the plans of other mobile home parks (even those shown in case studies 1 and 2), the mobile homes are extremely tightly packed on the park property. Even in 1995, this photo shows the park's degradation as evident in a somewhat haphazard placement of the mobile homes. In many ways, the park already looks very "messy." It is at the intersection of two major roads with the Metrorail tracks to the north, and light industrial development to the south.

In general, however, the area is beyond what we would consider low-income. Sadly, the neighborhood has become a victim of blight. Looking at Miami Herald archives, it is clear that in the last 5 years crime has increased in the area, particularly at the park itself. A positive sign for the community is that Habitat for Humanity is developing homes to the east of the park's location in an attempt to offer home ownership to economically disadvantaged families, and perhaps, stem the tide of blight.

The immediate area as a whole tends to be considerably mixed use. As Map 8 indicates, much of the immediate area to the east, south, and north east of the park has a light industrial land use. While the area generates jobs, it is not necessarily conducive

to residential development. While the map clearly shows large areas of low income residential housing, little shopping exists to support those households.

Looking at the lower resolution area, Map 9, shows the extent of the larger area of light industrial use including the major train station for the entire county. To the south, the light industrial area continues beyond the maps boundary. For the most part, however, the area is characterized by residential low income housing with some areas of shopping and commercial support.

While on one hand the area as a whole seems similar to the Lil Abner case study area with homogenous residential areas, the mix of the light industrial use changes the nature of the area as a whole. Once an area begins to be a victim of blight, it becomes extremely difficult to re-shape the area without major changes.

In the case of the Bell Haven Mobile Home Park, as the park's conditions worsened, it became increasingly hard to make the park profitable. The income generated by rents did not offer a high enough return on the initial investment by the new owners in 1998. Couple this with the high costs to clean and upgrade the park, it becomes evident that these economic pressures forced the new owners to close and redevelop the property. What is less clear is whether the new park owners were aware of the conditions and the costs and planned to close the park from the onset. What we have learned is that once a park begins to fall into disrepair, it is increasingly expensive to bring the park and the units up to appropriate code and health standards.

While it might be inevitable for some parks to close, this case emphasizes how difficult it is to find alternate housing for many households. Parks that close particularly as a result of financial hardship will be those parks with the lowest rent, highest overhead and the most marginal households. Many of the mobile homes in Bell Haven were very old with little equity. With the park closing selling the units was next to impossible since the cost to move them out of the park and into another would be prohibitive. Likewise, homeowners already struggling would not have the financial means to move the units themselves. The last 100 families in the park were the most marginal with most having little money or options for housing. Yet, it was only after the above mentioned Miami Herald article that any help was offered to these residents.

How do we avoid getting to this point? Clearly the best way to mitigate the pressures that lead to Bell Haven closing is to not allow mobile home parks to get into such disrepair. The conditions even before closing were becoming unlivable. The cost to fix the park and the units was too high. The question remains how a mobile home park gets to the point that Bell Haven reached. Where were inspectors? How were these conditions allowed to continue? Mobile home living requires more due diligence by county and local leadership as a result of the nature of a mobile home itself. By allowing mobile homes and parks to become unlivable, a cycle is put into place that leads to one inevitable conclusion. This is particularly important in our most marginal communities where someone needs to step up and become an advocate.

INSERT MAP #7

INSERT MAP #8

INSERT MAP #9

APPENDIX B

Digital Photography On-site in Mobile Home Parks

The photos in this Appendix were taken in numerous parks in South Florida. They are being included to illustrate some of the findings from our research referred to in the text of this report. These pictures document numerous instances where the permitting-inspection process has failed, and where specific Florida statutes addressing the repair or remodeling of manufactured housing are being ignored or un-enforced. The result of this, as has been stated in the text, is an increased potential for damage from hurricane events.

These pictures also document what seems to be a widespread trend: the desire of mobile home residents (really mobile home owners) to improve their dwellings through remodeling both to increase the size of the living area and to improve the aesthetic quality of the unit. In some of the parks visited the vast majority of the units have been doubled in size through the addition of *site built* improvements

Additionally, these pictures document examples of various devices installed in what appears to be an attempt to improve the tie downs holding the mobile home in place. These devices include: a) over-the-roof straps/tie downs, b) tie downs made of steel rods or steel cables, and c) tie downs incorporating turnbuckles for tightening them in place. There are also the typical metal strap tie downs.

In some cases the photographs document instances where the mobile home and its addition may have been refinished on the exterior, often from the eaves to the ground. In these cases at least two problems are apparent: a) the under floor ventilation has disappeared creating the possibility for damage to the undercarriage and floor of the mobile home as a result of accumulated moisture, rot, corrosion etc., b) it is no longer possible to view the tie downs.

The IHC research team will be annotating many of these pictures to graphically document some of the findings, and to assist with the analysis of such findings.