



A Resource of the State of Florida

**HURRICANE LOSS REDUCTION
FOR
HOUSING IN FLORIDA:**

**BARRIERS TO THE UPGRADING OF
EXISTING MOBILE HOMES AND
COMMUNITIES**

A Report Summarizing the Findings from
the Hurricane Loss Reduction for Housing
Project Years 1 - 4

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INTRODUCTION

The 1999-2000 Florida Legislature created the Bill Williams Residential Safety and Preparedness Act, and subsequently the Hurricane Loss Mitigation Program, to determine how funds from the Florida Hurricane Catastrophe Fund (a.k.a. Cat Fund) should be allocated. The Florida Department of Community Affairs manages the Hurricane Loss Mitigation Program. According to the Florida Statue, the Department of Community Affairs is to allocate 10 percent of these funds to a Type I Center within the State University System dedicated to hurricane research [i.e., the International Hurricane Research Center (IHRC) at Florida International University]. Subsequently, the IHRC defined three primary initiatives that were approved by the advisory council, including to:

- Eliminate the state and local barriers to upgrading existing mobile homes and communities,
- Research and develop a program for the recycling of existing older mobile homes, and
- Support programs of research and development relating to hurricane loss reduction devices and techniques for site-built residences.

The inability of mobile home communities to re-platt and/or upgrade to newer, safer units increases the risk of damage to or even complete destruction of these older units in the event of a hurricane. These factors also contribute to the degradation and closure of mobile home communities throughout the State of Florida. Additionally, poor maintenance of individual mobile homes and the deterioration of community facilities expedite this process. The physical condition of the park eventually results in the departure of park residents, which introduces economic degradation to the local community. In the end, market or economic and regulatory pressure may combine with these other factors leading to park closure, sale of the land, and displacement of the resident population.

Over the last four years, researchers at the IHRC have identified a range of factors—including regulatory, political and socio-economic influences—that negatively affect mobile home communities. This report summarizes the findings and recommendations developed by the IHRC. Then the report presents several critical issues and barriers impeding residents of mobile home communities from upgrading to safer units, and provides recommendations to ameliorate these issues.

ANNUAL GOALS AND OBJECTIVES

The following summarizes the primary goals of the IHRC's research initiatives over the past four years that focused specifically on barriers faced by mobile home residents. The methods and approaches used by IHRC researchers are summarized as well.

Year 1

- *Goals.* Obtain characteristics of mobile home residents and mobile home communities throughout the State of Florida. Obtain information pertaining to the regulatory environment affecting mobile home installation and maintenance.
- *Methods.* IHRC researchers conducted face-to-face and telephone surveys with 1,205 mobile home residents, and reviewed federal, state, and local regulations, statutes, and documentation pertinent to mobile homes.

Year 2

- *Goals.* Four primary objectives were outlined.
 - Determine the extent to which the existing regulatory environment may be contributing to barriers to the upgrading of existing mobile homes and communities.
 - Examine issues faced by mobile home communities within Hillsborough, Pinellas, and Polk counties (these are counties with a high concentration of mobile home units).
 - Determine if the dissemination of information by public agencies may be contributing to an environment that makes it difficult for residents to undertake upgrade initiatives.
 - Identify potential solutions to alleviate or eliminate the existing barriers.
- *Methods.* The IHRC research team conducted detailed analyses of the regulatory environment in Polk county, examined municipal codes in Broward and Miami-Dade counties allowing or preventing mobile home installation, conducted on-site visits to mobile home communities, and examined the location of mobile homes in relation to vulnerability to nature disasters.

Year 3

- *Goals.* Conduct case studies to illustrate the types of barriers encountered by residents of mobile home communities.
- *Methods.* IHRC researchers focused primarily on the west central coast of Florida and (a) analyzed land use laws, codes, and plans, (b) interviewed residents, community managers, agents/brokers, and manufacturers, (c) interviewed architects and engineers, (d) met with staff from building and planning offices and mobile home community owners, (e) made observations of mobile home communities, and (f) conducted literature

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and internet searches.

Year 4

- *Goals.* Examine options for renovating existing mobile home units. Examine a mobile home community closure to learn about the processes of community closure and the socio-economic impact on displaced residents.
- *Methods.* Interviews were conducted with both private and public organizations that are involved in the renovation of mobile homes. A case study was used examining a mobile home community closure and how it affected the residents.

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Profile of Mobile Home Residents

1. Issues of mobile home safety directly affect a large segment of the State's population, and these issues are not only important for residents themselves, but also for State and community legislators and policy-makers.
 - At the beginning of the Grant period, IHRC researchers determined that approximately 2 million residents of the State of Florida live in mobile homes, which represents about 12.5% of the State's total population based on U.S. Census 2000 data.
 - Florida leads all states in the total number of mobile homes with 849,000 according to U.S. Census 2000 data. Approximately 11.6% of all housing units in the State are mobile homes.
2. Results of the Year 1 (1999-2000) survey indicated that the income levels of Florida's mobile home residents are lower than those of residential homeowners.
 - The majority of mobile home households (51.4%) reported annual household incomes of between \$20,000 and \$50,000. Approximately 35.9% reported annual household incomes of less than \$20,000. Only 12.7% reported annual household incomes in excess of \$50,000.
 - In contrast, based on a survey conducted a few years prior by the Laboratory for Social and Behavioral Research at the International Hurricane Center, 49% of residential households indicated annual incomes greater than \$50,000. Less than 10% indicated annual income of less than \$20,000.
 - As a result of these financial constraints, mobile home residents are disadvantaged in terms of undertaking capital expenditures to improve the mitigation status of their homes.
3. A high portion of mobile home residents are elderly (age 65 and older). These individuals typically have fixed or limited incomes, which is likely a contributing factor to the lower income levels reported by mobile home community residents.
 - Over 85% of households have at least one elderly resident, with 36.1% consisting entirely of elderly residents. Approximately 15.4% of households are widowers living alone.
 - Approximately 22.2% of households reported having children under the age of 18.
 - Based on these findings, many mobile home residents could be characterized as having special needs in the event of a hurricane.
4. English is the primary language spoken in approximately 93% of households. Spanish was the primary language spoken in approximately 4% of households.
5. Approximately 41.2% of residents indicated high school graduate as the highest grade completed by an adult member of the household.

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6. The majority of mobile home residents indicate that they own their mobile home (approximately 90.7%).
 - Most of the mobile home owners reported owning their unit outright. Only 31.2% indicated that they have a mortgage.
 - Findings from follow-up surveys conducted during Year 3 suggest that approximately 95% of residents in mobile homes built since 1993 own their unit. In contrast, only 73% of those residents living in mobile homes built during the Pre-1976 era own their unit. The individuals renting these older units are among the nation's lowest income families and have few affordable housing options.
7. Approximately 85% of mobile home owners report having insurance.
8. Respondents to the Year 1 survey were asked to indicate why they chose to live in a mobile home. Affordability related reasons were the most common answers.
 - 50.1% of mobile home residents indicated affordability was the reason for living in mobile homes. Other affordability-related reasons include: (a) low maintenance in the context of keeping costs down (5.5%), (b) being economical (1.7%), and (c) for retirement and economic reasons (.8%).
 - A variety of other reasons were then provided, the most common include: (a) the amenities of the community or located in the area of the community (14.9%), and (b) convenience (5.0%).
9. The majority of respondents to the Year 1 survey indicated that they believed their mobile home units were less safe than site-built homes.
 - However, a surprising finding was that 28.5% of respondents indicated that they believed mobile homes were as safe, safer, or much safer than site-built single family homes.

Profile of Mobile Homes

1. In the State of Florida, mobile homes are considered motor vehicles and require a certificate of title (just as a car or truck would).
 - Each section of a double- or triple-wide unit is considered a separate motor vehicle and requires a separate title. Each year the owner must purchase and display a decal on each section.
 - Mobile homes are taxed as vehicles. This changes if: (a) the owner also owns the land on which the unit is located and (b) "permanently affixes" the unit to the land. The mobile home then becomes "real property" and is placed on the tax rolls of the county.

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2. During Year 1 research, IHRC researchers estimated that slightly more than one-half (52%) of the mobile homes in the State are located in mobile home communities.
 - Because the remaining 48% of mobile homes may be installed anywhere, their locations are nearly impossible to identify making it difficult for the research team to assess their vulnerability to hurricane impact.
 - There is no single database that can provide accurate estimates as to the number of mobile homes and their locations. Each unit of a multi-unit mobile home must be registered, which then inaccurately increases the numbers represented in the database. Addresses and locations are often incorrect, because the address required by the State is that of the owner, and approximately 10% of these addresses are from out of state.
3. Three distinct generations of mobile homes exist.
 - Pre-1976 Era. These homes were built at a time when no manufacturing/design standards existed, and are particularly vulnerable to wind damage. Approximately 25% of mobile homes in the State are of this era.
 - 1976-1994 Era. These homes were built to standards set by the United States Department of Housing and Urban Development (HUD). Approximately 61% of mobile homes in the State are of this era.
 - Post-1994 Era. Homes built during this era must meet strict design and manufacturing standards, including wind load standards based on American Society of Civil Engineers (ASCE) specifications. Approximately 14% of mobile homes in the State are of this era.
4. Pre-1976 era mobile homes are particularly vulnerable to hurricane impact and have a high probability of sustaining catastrophic losses.
 - These units suffer degradation due to moisture build-up in the walls and cavities, loosening of connections, and corrosion of anchor components that reduce the structural integrity of the units. This degradation increases the probability of catastrophic loss during a hurricane.
 - Manufactured housing industry sources indicated that most of the mobile homes destroyed during hurricane Andrew were built during this era.
5. Typically, the mobile home units that are the oldest and in the most depreciated condition are occupied by the poorest members of society. These occupants cannot afford to pay for the newer, better, and safer units.
 - Various subsidized housing programs that began in the U.S. in the 1930's have been phased out beginning in 1973. The trickle-down of used and older mobile homes has, for many, been the only available housing stock.

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6. During Year 2 research, IHRC researchers used both the Florida Department of Health and the Department of Motor Vehicles databases to determine the distribution of mobile home units by region throughout the State of Florida.

Area/ Region	Region Name	Estimated Mobile Home Units	Counties Included in Region
1	West	40,933	Escambia, Santa Rosa, Okaloosa, Walton, Holmes, Washington, Bay, Jackson, Calhoun, Gulf
2	Big Bend	16,637	Gadsden, Liberty, Franklin, Leon, Wakulla, Jefferson, Madison, Taylor, Hamilton, Suwannee, Lafayette, Dixie
3	Northeast	60,116	Columbia, Gilchrist, Baker, Union, Bradford, Alachua, Nassau, Duval, Clay, Putnam, St. John, Flagler
4	West Center	431,954	Levy, Citrus, Hernando, Pasco, Pinellas, Hillsborough, Manatee, Polk
5	Central	223,521	Marion, Sumter, Lake, Volusia, Seminole, Orange, Osceola, Brevard
6	Southwest	157,937	Sarasota, Hardee, DeSoto, Charlotte, Lee, Highlands, Glades, Hendry, Collier
7	Southeast	208,903	Okeechobee, Indian River, St. Lucie, Martin, Palm Beach, Broward, Monroe, Miami-Dade

7. During Year 4 research, IHRC researchers estimate that over one-half of all mobile home communities (56.5%) are located in coastal areas with the greatest exposure to hurricane hazards.
8. During Year 4 research, IHRC researchers estimated that 63.4% of Pre-1976 era mobile homes are located in the metropolitan-area counties that have the most exposure to hurricane hazards, affecting approximately 424,545 individual residents.
- Another 6.8% of the Pre-1976 era mobile homes are estimated to be in the non-metropolitan-area counties with the greatest exposure to hurricane hazards, affecting approximately 45,335 additional residents.
9. IHRC researchers found that the majority of mobile homes throughout the State have some form of on-site addition attached to the unit after its initial installation.
- From Year 1 research, additions were found in 93% of mobile home communities visited in Miami-Dade county. Similar results were found in Hillsborough, Pinellas, and Polk counties.
 - Also from Year 1 research, 78.6% of respondents to the state-wide survey indicated that their mobile home contained additions.
 - The most common types of attachments include porches, additional rooms, garages, and carports.
 - These additions contribute to the vulnerability of these units and the potential for damage in the event of a hurricane.

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- These additions are also a violation of Florida statutes. The local zoning statutes are either unclear or not enforced with regard to mobile home communities and residential structures.
10. IHRC researchers found that owners of residential, site-built homes are often eligible for insurance premium discounts and credits for implementing Risk Mitigation Measures (RMM) that reduce the potential for destruction in the event of a hurricane. These discounts are not available to mobile home owners.
- Discounts typically range from 5-10% depending on the mitigation factors.
 - Mobile homes built according to HUD's standards typically have a small reduction in insurance premiums of about 5%.
 - There appears to be a general consensus among insurers that improvements in the quality and installation of tie-downs could reduce the cost of hurricane loss protection and hence premiums. At the same time, insurers also believe that there is a need for continuous inspections to ensure that tie-downs remain in adequate condition.

Profile of Mobile Home Communities

1. Several ownership/rental options exist for residents of mobile home communities.
 - Own Home/Rent Land. Individuals who own their mobile home may install the unit on land rented from a landlord (these are referred to as leasehold communities). This is the most common form of community.
 - Own Home/Own Land. Individuals who own their mobile home may also own the land outright through a cooperative arrangement with other residents.
 - Rent Home. In these situations both the land and mobile home unit are owned by the community owner. Residents pay rent to live in the unit.
2. Certain counties and areas in the State appear to have a higher concentration of mobile home communities.
 - Over one-quarter of Polk county residents live in mobile homes, and the county is home to more than 500 mobile home communities containing a total of 45,810 spaces. It is estimated that an additional 15,000-23,000 homes may be located outside of mobile home communities.
 - Because of the high concentration of mobile homes in Polk county, IHRC researchers spent extensive time in the county investigating issues facing mobile home residents.
3. Many of the mobile home communities in Polk county are sequestered behind walls or other buffering devices to shield them from the view of neighbors.
 - These buffers do little to mitigate damage from high winds to units and the

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surrounding neighborhoods.

- These buffers also limit the residents' ability to communicate with the rest of the community and limit clean-up and damage assessment access following a hurricane event.
4. During Year 1 research, 62% of the mobile home community residents interviewed indicated they would use a shelter located in the community in the event of a hurricane.
 - 70% of residents indicated that the presence of an on-site shelter would be a deciding factor in selecting a mobile home community.
 5. Mobile home community owners and managers have a contrasting perspective regarding on-site shelters. The majority of owners and managers interviewed in Year 1 indicated a preference for residents to evacuate the community and to not prepare an on-site shelter.
 - Many owners and managers also expressed concerns regarding liability issues in the event that a resident is injured. Florida statutes relieve community owners of liability in cases of declared emergencies.

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The State Regulatory Environment — Findings

1. The basic regulatory environment for mobile homes is a top-down hierarchy.
 - Federal role. At the federal level, policy affects the design, manufacturing, and safety issues of mobile homes.
 - State role. At the state level, policy focuses on the installation and transportation of mobile homes.
 - Local role. At the local (county and municipality) level, policy focuses on decisions land zoning, inspection of units, and issues of public safety.
2. In Year 1 research, IHRC researchers found that there is no single data source or combination of data sources within the state or nationally that provides: (a) an accurate count of mobile homes in the State of Florida, (b) the types of units (e.g., single-wide, double-wide, etc.) installed, or (c) their location.
 - As a result, the IHRC team was unable to obtain exact counts of mobile home units. Approximate counts are used instead.
3. There appears to be a wide ranging lack of enforcement of regulatory provisions. For example, site-built additions are a direct violation of existing statutes.
 - It appears that the additions were added to the mobile homes without the owners filing for permits, even though State statutes contain language regarding the need for building permits. Building permits help to ensure that safety standards are adhered to.
 - Potential reasons for the lack of enforcement include, gaps regarding jurisdiction and responsibility, confusion over jurisdiction, and lack of adequate resources to enforce the statutes.
4. During Year 3 research, IHRC researchers found that the lack of public policy addressing mobile homes may, at least in part, be fostered by a belief that market forces should shape the outcome of the problem being faced by mobile home owners and renters.
 - This creates an obviously unfair struggle between sides, with the greatest power and resources concentrated on the side seeking to benefit at the expense of entire mobile home communities being displaced.

The State Regulatory Environment — Recommendations

1. Consider the feasibility of creating a Bureau of Manufactured Housing to establish a single entity responsible for researching, identifying, and resolving issues surrounding the vulnerability for damage among mobile home residents.
 - This Bureau could be charged with implementing the long-term initiatives funded by the Bill Williams Act.

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2. Consider upgrading the software system used to collect and maintain the DMV registration database. This software should address the following:
 - A way to link mobile home units that are registered individually, but are components of double- or triple-wide units. Currently, this is not possible.
 - A field to identify the location in which the unit is installed. This is critical information to determine risk of exposure to potential hurricane damage. Currently the registration includes the registration address, which is the address of the owner of the unit. A review of the records indicates that 10% of registered units have an out of state address on record.
3. Consider creating and maintaining a web-accessible master database of mobile home community property information (zoning, tax, resident demographics, enforcement actions, etc.) that is accessible by all enforcement and housing assistance agencies.
4. More research is needed to identify and classify the various types of on-site additions to mobile homes.
 - This information is needed to study how the types of additions affect the structural performance of the unit under hurricane conditions.
 - This research would be used to: (a) develop mitigation measures to reduce potential damage, (b) propose policy alternatives for comprehensive mitigation programs, and (c) implement community outreach and educational programs for mobile home residents and local governments having jurisdiction over installation.

The Local Regulatory Environment — Findings

1. The terms *mobile*, *manufactured*, and *modular* housing are often used interchangeably in local statutes and planning efforts. While the terms “mobile” and “manufactured” homes are generally considered to be interchangeable terms, “modular” homes are not the same as “mobile” or “manufactured” homes. This creates some confusion for the general public which could create bureaucratic impediments to the redevelopment of mobile home communities.
 - Mobile home. The State of Florida Department of Motor Vehicles (DMV) defines a mobile home as: “A dwelling which is built on an integral chassis, in a factory, transportable in one or more sections, and which is eight feet or more in width.”
 - Manufactured home. HUD defines a manufactured home as: “Dwelling units of at least 320 square feet in size with a permanent chassis to assure the initial and continued transportability of the home. All transportable sections of manufactured homes built in the U.S. after July 15, 1976, must contain a red label. The red label is the manufacturer’s certification that the home section is built in accordance with HUD’s construction and safety standards. HUD

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standards cover Body and Frame Requirements, Thermal Protection, Plumbing, Electrical, Fire Safety and other aspects of the home.”

- Modular home. A modular home is a permanent structure that is not site-built, but is rather site-assembled from component parts. The individual components are manufactured in a factory, then shipped to a site where they are assembled together onto a foundation that is site specific. They do not have the same chassis structure in their floor that manufactured homes have, and are not meant to be moved once they are installed.
 - “Mobile” and “manufactured” homes are often used interchangeably, however technically homes built after the HUD code went into effect on June 15, 1976 are referred to as “manufactured homes”.
2. In Year 2, IHRC researchers concluded that there appeared to be knowledge gaps among public officials regarding levels of jurisdiction and enforcement responsibility over regulations regarding mobile home installation and upkeep.
- Local offices in Miami-Dade and Broward counties were contacted through a combination of personal visits, phone calls, and faxed requests for information. Most of the offices visited did not have any printed information to give out, and members of the IHRC Research Team were often sent from one office to another and from one individual to another within given offices. This indicates that it is quite difficult for individual residents to obtain clear, brief, and specific guidelines regarding the requirements for installation of mobile homes within the jurisdiction.
 - Due in part to these knowledge gaps, IHRC found confusion over which entities have jurisdiction over which areas related to mobile homes/manufactured housing.
 - These knowledge gaps provide a substantial, though not insurmountable, barrier to mobile home owners and renters as well as community owners and managers regarding mobile home installation and maintenance in those jurisdictions.
 - This also affects the enforcement of regulations (inspections, enforcements, etc.), potentially leading to public safety problems within mobile home communities and the surrounding areas.
3. During Year 3 research, the IHRC researchers conducted a follow-up interview with 27 mobile home sales personnel in Polk, Pinellas, Hillsborough, and Broward counties to determine the extent of the knowledge gaps with respect to the regulatory environment.
- Most building officials that were interviewed were aware and knowledgeable of the regulations pertaining to mobile home installation.
 - This finding is in contrast to Year 2 findings. It was concluded that while officials are aware of the regulations, the confusion and knowledge gaps found during Year 2 research were primarily among the staff responsible for providing information to the public.

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4. Among mobile home dealers responding to the Year 3 survey, approximately 48% indicated that buyers are required to have their mobile homes installed by dealers, and approximately 44% indicated that buyers could not find their own installer for a mobile home. This is incorrect information.
5. Information pertaining to regulations and associated land-use and zoning issues is available. However, this information is dispersed among several sources making it difficult for the general public to become educated on such issues in a timely manner when purchasing a mobile home.
6. IHRC researchers found that local statutes limited the installation of mobile homes in both Miami-Dade and Broward counties.
 - In Miami-Dade county, 17 of the 30 municipalities have local statutes that may prohibit the installation of mobile homes, while there are another 5 municipalities that only allow mobile homes to be installed in mobile home communities and not on individual lots.
 - In Broward county, 1 municipality has a statute that may prohibit the installation of mobile homes, however none allow mobile homes to be installed on private lots and 12 municipalities allow mobile homes to be installed in existing mobile home communities or mobile home subdivisions.
7. IHRC researchers found that Polk county appeared to have a more “mobile home friendly” atmosphere. However, researchers raised concerns regarding duplication of information in zoning codes and building codes regarding installation of mobile homes, and some information that belonged in building codes was found in zoning codes or vice-versa.
 - There is a general lack of clarity with respect to which statute (building or zoning) addresses health, safety and welfare issues such as tie downs, additions, and maintenance for mobile home owners and community managers.
 - Zoning officials generally lack the proper training and expertise to enforce building code requirements. As a result, mobile homes in some municipalities may be at greater risk to damage from hurricane impact.
 - In Polk county, no zoning codes address the issue of mobile home maintenance, although the county requires inspection of units moved from one location to another. Site visits by IHRC researchers in Year 2 found numerous poorly maintained mobile homes. These homes are particularly vulnerable to damage or loss in the event of a hurricane.

The Local Regulatory Environment — Recommendations

1. To help local communities avoid conflict, confusion, and duplication in their many ordinances, IHRC researchers offered two recommendations.

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- Strike references to mobile home installation in local zoning codes and instead make reference to Florida Department of Highway Safety and Motor Vehicles Division Rule 15C-1 in their building codes. This rule contains both “descriptive-based” and “performance-based” specifications for all of the necessary components used in the installation of mobile homes based on the American Society for Testing and Materials (ASTM) standards.
 - The new Florida Building Code does include instructions for installation of mobile homes in flood hazard areas. The State should consider including mobile home installation requirements in the Florida Building Code to provide a single, comprehensive resource for mobile home owners in the State. This will hopefully ensure that units installed in the manner set forth by the code will most likely withstand damage in the event of a hurricane.
2. There is a need for education and outreach efforts to close the knowledge gaps for staff at county and municipality agencies, mobile home dealers, mobile home owners, and mobile home community owners and managers.
- Undertake a comprehensive outreach/educational effort to ensure that all involved parties are well informed about the levels of jurisdiction and responsibility, regarding installation, modifications, and inspections of manufactured housing.
 - A program of this nature could involve the Florida DMV, DCA, and the State university system.
3. In conjunction with, or perhaps before the outreach/educational effort, conduct research in various areas of the State to (a) identify specific knowledge gaps regarding the regulatory environment, and (b) assess the best methodology to implement the outreach/education programs.

Land Development and Zoning — Findings

1. Real estate market conditions appear to be one of the biggest barriers to the maintenance and expansion of mobile homes. Land values are at a premium, and there are few financial incentives for developers or local governments to focus resources on lower-cost housing such as mobile homes. In a choice between higher-end residential or commercial construction, mobile homes are the least desirable alternative.
2. Several market and economic forces are negatively affecting mobile home communities.
- Development in the vicinity of a mobile home community may negatively affect a communities’ ability to upgrade existing units and facilities if that development favors commercial enterprises or high-cost housing. Communities face pressures to close due to rising land costs, the potential for higher property taxes, and the incentives to sell the communities.
 - If the land surrounding the community becomes industrial, the character of the community may deteriorate causing it to be an ineffective business venture.

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3. County and/or municipality-specific land development and zoning forces are placing the most negative stresses on mobile home communities. These include:
 - Residential density requirements that are more suitable for multi-family housing (e.g., condominiums, townhouses, etc.) as opposed to mobile homes.
 - Geographic restrictions on the development of mobile home communities creates a situation where establishing new communities is a less attractive alternative than other options for the use of that land.
 - Programs of annexation of unincorporated areas (such as those in Broward county) may result in existing communities declared as non-complying with existing regulation in the municipalities annexing them.
 - Additionally, zoning regulations often specify individual lot size requirements for site-built homes and current lot sizes are too small to accommodate such requirements.
 - Zoning regulations often specific large-lot size requirements to establish mobile home communities (typically ranging from 5-15 acres) in counties or municipalities with limited vacant land and tendencies toward higher-cost land.
4. Zoning changes also create direct barriers to upgrading mobile homes.
 - Zoning changes (such as those identified in Polk County) create situations where existing mobile home communities are no longer in conformity with allowable land use in certain districts.
 - In some cases, communities face statutes that actually prohibit the redesign or expansion of the area or accommodations of mobile home communities, including replacing existing, older units.
5. Annexation appears to create substantial barriers to upgrading mobile homes. When mobile home communities and units are declared non-complying with existing regulations, owners are typically barred from expanding or making modifications of any kind.
 - As a result, the physical plant within the community deteriorates, which may in turn lead to neglect in the maintenance of units and eventually closure or abandonment of the community.
 - Deteriorating and abandoned communities create additional hazards during hurricanes due to the potential for damage to surrounding areas from wind-propelled debris.
 - Abandoned and closed communities also create housing problems for the displaced population.
6. Due to existing zoning regulations, many mobile home residents often face a situation where their units are located in areas most vulnerable to damage, yet regulations prohibit replacement of units with new mobile home units.

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Land Development and Zoning — Recommendations

1. More research is needed on the net balance (additions versus closures) of mobile home units in specific counties and municipalities, along with the reasons for those additions and closures.
2. Education and outreach programs for counties and municipalities are needed that focus on planning efforts to ensure the continued availability and development of mobile home residences.
 - Encourage municipalities to develop long-term community plans that include provisions allowing for or encouraging future development of mobile home communities.
 - These plans should state that only Post-1994 era mobile homes be installed, and include flood hazard zoning ordinances to make these communities less vulnerable.
3. Education and outreach is needed to better prepare mobile home communities to confront the pressures that may lead to community closure and displacement of residents. These efforts should address:
 - Florida statutes regulating issues pertaining to mobile home installation, maintenance, and safety.
 - Options for replacing dilapidated units to decrease risk of damage and avoid general degradation of communities which could lead to closure.
 - Alternative land ownership and economic models that can help preserve mobile home communities.
4. It is important to keep in mind that mobile homes provide an affordable housing alternative that is important for the most economically disadvantaged.

Mobile Home Rehabilitation — Findings

1. IHRC researchers examined efforts across the U.S. aimed at renovating or remanufacturing older mobile home units.
 - These renovation programs primarily aim to strengthen the structural integrity of the units by adding shear walls, horizontal diaphragms, and uplift straps.
 - Across the U.S., several innovative not-for-profit programs were launched using prison labor or vocational programs. Unfortunately, many of these programs were discontinued because they were not sustainable.
 - In California, several sustained programs exist that encourage renovation of individual mobile home units and communities. These efforts combine public

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agencies and nonprofit developers assisting individual homeowners through deferred payment loans with low or no interest.

2. IHRC researchers identified a number of obstacles to financing mobile home rehabilitation programs.
 - An overarching prejudice against mobile homes in communities created difficulties at obtaining public/private resources for this type of housing which is typically viewed as personal and not real property.
 - Mobile homes installed in rented communities are financed as personal property because conventional single-family mortgages require that (a) land and property be bundled together, and (b) a home be on a permanent foundation. As a result mobile home owners often have to resort to sub-prime lending agencies for rehabilitation loans, and these loans charge interest rates as high as 22 percent.
 - While government supported affordable housing programs exist, they typically do not allow funds to be used to renovate mobile homes.
3. The financial cost-benefit of rehabilitating mobile home units was examined and it was found that for-profit businesses often have difficulty re-cooping their investments because the cost of repairs may exceed the market value of the rehabilitated unit.
 - Estimated costs of renovations have ranged from approximately \$8,000 to \$40,000.
 - Rexmere Village of Broward county Florida, estimates that the market value of a rehabilitated unit is approximately \$15,000.
 - The costs for retrofitting vary from unit to unit. Homes installed prior to 1986 range from \$1,600 to \$2,000. Homes installed from 1986-1999 range from \$1,200 to \$1,600, and homes installed after 1999 range from \$750 to \$1,200.
4. IHRC researchers found that Pre-1976 era homes are particularly difficult to rehabilitate once they have been damaged. The floors are typically made of flake board that warps once it gets wet. Roofs are made of galvanized metal which is difficult to repair. Once flooded, it is more common for the entire unit to be replaced rather than repaired.
 - The Blair Group of Lakeland, Florida is one the State's largest and most experienced mobile home repair companies. They estimate that it costs approximately \$93,000 to rehab a Pre-HUD mobile home.
5. There are some statutes in the State of Florida containing housing elements and regulating programs for the provision of adequate sites for future housing (including mobile homes) or the improvement/rehabilitation of housing.
 - In some cases where housing related programs may be funded by federal or state grants, the statutes actually prohibit the use of funds for the rehabilitation of mobile homes.

BARRIERS TO REHABILITATION AND REPLACEMENT

Mobile Home Rehabilitation — Recommendations

1. It is not feasible or practical to rehabilitate older mobile homes. The costs associated with such investments are likely to be exorbitant.
 - Barriers faced in upgrading older units include difficulty complying with building codes, and continued poor performance and lack of ability to withstand severe weather conditions.
2. An accelerated program of research is needed into the socio-economic alternatives for the replacement of mobile homes built during the Pre-1976 era. This research would be used to determine policy alternatives for the consideration of state legislators.
 - The State should explore options for implementing a program of retiring Pre-1976 units and replacing them with small mobile or “site-built” houses.

Mobile Home Community Rehabilitation — Findings

1. IHRC researchers suggest that community redevelopment issues can be grouped into two main categories.
 - Addressing regulatory issues, which includes: (a) minimum lot areas required in some communities, (b) set back requirements for the side, front and rear yards, (c) existing easements, covenants, and deeded right of ways (typically for utilities), (d) fire safety, (e) storm water retention, and (f) other regulatory issues (restricted land use, requirements to use city water and sewage, etc.).
 - Addressing infrastructure issues, which includes: (a) roads, (b) sewers, (c) water supplies, (d) electricity, and (e) telephone.
2. During Year 3 research, IHRC researchers found that community owners trying to improve the distressed appearance of their communities are often hampered by a lack of available and affordable replacement units (either rehabilitated or new units).
3. IHRC researchers examined land use patterns at several mobile home communities in Florida and found similarities in community layouts and land use. They found that older communities in particular often have smaller lot sizes that are not able to accommodate newer, wider units.
4. In Year 1 research, the IHRC team followed up with a program initiated by the State of Florida Department of Community Affairs (DCA) in 1999 to identify 5 mobile home communities in the State where existing community centers could be retrofitted into approved shelters for residents. The program provides up to \$90,000 to retrofit each community center.
 - The IHRC team found that few owners applied for the funding, and most were generally against the idea for multiple reasons, including: (a) potential liability, (b) cost of maintenance and upkeep, and (c) lack of resources to activate the

BARRIERS TO REHABILITATION AND REPLACEMENT

shelter while also securing the total site.

Mobile Home Community Rehabilitation — Recommendations

1. Re-platting of existing mobile home communities provides a promising option for redeveloping mobile home communities into more sustainable layouts, with safer housing alternatives.
 - Re-platting solves issues associated with vehicle circulation, right of way, setback rules, size of lots, etc.
2. During Year 2 research, IHRC researchers suggested the following strategies for re-platting existing communities.
 - Lot consolidation. One option would be to consolidate adjacent lots.
 - This option is logistically difficult as adjacent lots would need to be vacant simultaneously.
 - This option would also reduce the overall number of lots in the community, causing owners to increase rent, creating further hardships for the poorest residents of the community.
 - Even though rents would be larger, they would likely not be large enough to cover the rent from two lots and refurbishing costs, thus causing reduced cash flow for owners.
 - Community re-configuration. For larger lots, the community could be reconfigured to accommodate single units grouped in a cul-de-sac design.
 - This approach requires extensive reconfiguration and investment on the part of the community owners.
3. IHRC researchers explored options for replacing mobile home units, and suggested the following strategies.
 - For consolidated lots, mobile home units could be replaced with small, site-built units arranged in a “cottage development” pattern (small detached houses) or one that incorporates a “party-wall” development pattern. The site-built units are another form of affordable housing that have a greater ability to withstand the elements than the older mobile home units they are replacing.
 - Also for consolidated lots, replace adjacent lots with two attached, two-story units (duplexes). This approach would create additional green space in the existing lots and require little community reconfiguration.
 - Modular homes, which are permanent structures that are site-assembled from pre-built components, provide another option for replacing older mobile home units. Because the components are built in standardized, weather-controlled environments, the houses themselves should provide superior construction.

BARRIERS TO REHABILITATION AND REPLACEMENT

However, the size of the unit may be too large for existing community layouts requiring designers to offer smaller models, and the compact nature of many mobile homes may present a barrier to on-site assembly.

4. Park model homes are another option that could be used to replace older units on smaller lots. Park model homes are a subset of manufactured homes retailed by RV and manufactured home dealers. The Park model homes typically range in size from 8-13 feet widths to 25-45 feet lengths. These units fit well into existing community lots and have more house-like construction, which should increase their ability to withstand a hurricane event.
5. IHRC researchers identified several factors that could adversely affect the potential redevelopment (including re-platting) of mobile home communities into affordable single-family subdivisions that may make this option unrealistic.
 - Cost impediments. In many cases, redevelopment would require the extension of municipal utilities to the community at substantial costs to the owners. These costs would then be passed onto tenants.
 - Regulatory impediments. In cases where mobile home communities are zoned for multiple occupancies, proposed changes would require revisions to land use codes, involving hearings, professional consultants (and their fees) with costs again being passed onto tenants.
 - Demand impediments. Among certain segments of the population, there is a demand for independent, inexpensive housing (or the perception therefore), which is provided by mobile home communities, not single family subdivisions with larger lots.
 - Redevelopment impediments. As Florida cities expand, mobile home communities on the periphery have been engulfed and redeveloped (typically as apartment buildings at rents that current occupants cannot afford).
6. Unfortunately, re-platting existing communities may be virtually impossible given current zoning laws, costs, real estate ownership issues, and traffic codes.
7. Consider revising the DCA program to take into account the concerns expressed by community owners and managers.
 - Following the revision of the DCA program, undertake an outreach program targeting community owners and managers to promote the on-site shelter program.

EXAMINATION OF MOBILE HOME COMMUNITY CLOSURES

Findings

1. Because of the myriad barriers to the upgrading of mobile home communities, numerous communities throughout the State of Florida are closing.
 - One powerful reason for the closure of mobile home communities is community redevelopment. At the local level, mobile home communities are being converted into single-family subdivisions of site-built residences or multi-family apartment communities.
2. The closure of these mobile home communities results in the displacement of thousands of residents annually.
 - These displaced residents tend to be from the lowest economic sector of society and mobile homes are one of the best, if not only, affordable housing alternatives.
 - Because of their economic status, new affordable housing in the form of apartments or single-family housing rentals are often beyond their reach.
3. Displaced residents who own their units must either move or abandon their mobile homes.
 - While mobile homes are by definition mobile, structural deterioration of older homes makes moving these units virtually difficult. For those units that can be moved, costs can reach \$10,000 or more.
4. From surveys conducted during Year 3, IHRC researchers found that community closure and displacement is often an emotionally and financially traumatic experience for mobile home community residents.
 - Displaced residents often express regret over the loss of community that they felt in their communities.
 - There is a scarcity of affordable housing alternatives for many of these individuals.
 - However, IHRC researchers also found that the majority of those interviewed indicated that while they initially experienced emotional turmoil over having to leave, they also indicated that they felt “better off” in retrospect approximately two years after they moved.
5. During Year 3, IHRC researchers tracked displaced former mobile home community residents finding that about one-half of the displaced residents continue to live in mobile homes.
 - Approximately 50% of former residents are currently residing in mobile home communities in units that are newer and in better condition. Nearly all of these individuals moved to leasehold communities.
 - The remaining 50% of former residents move to a variety of different types of housing, including apartments, single family houses, and rooms in family members’ homes. Many of these individuals indicated that they faced financial

EXAMINATION OF MOBILE HOME COMMUNITY CLOSURES

hardships during the transition process.

6. The State of Florida has established the Mobile Home Relocation Trust program to provide compensation to a mobile home owner who is required to move due to a change in the use of land comprising the mobile home community. Displaced residents are entitled to payments from the Florida Mobile Home Relocation Corporation (FMHRC) of:
 - The amount of actual moving expenses (costs of moving, set-up, and installation) associated with relocating their mobile home to a new location within a 50-mile radius of the vacated community, OR
 - The amount of \$5,000 for a single-section mobile home, or \$10,000 for a multi-section home for those mobile home owners who received an eviction notice dated prior to June 26, 2003, whichever is less.
 - For those who receive an eviction notice dated after June 26, 2003, they are entitled to either the amount of actual moving expenses described above, or the amount of \$3,000 for a single-section mobile home, or \$6,000 for a multi-section home, whichever is less.
 - For those owners who must abandon their units, the State provides \$1,375 for single-wide units and \$2,750 for multi-unit homes.
7. Based on a review of mobile home community closures and economic conditions conducted during Year 4, IHRC researchers concluded that mobile home community closures are likely to be a continuing reality in urban areas of the State because of the: (a) increasing value of land occupied by urban mobile home communities, (b) costs of upgrading the infrastructure of communities, (c) local government needs for increased tax revenue, and (d) desires of nearby residents and businesses to have the communities converted to other uses.

Recommendations

1. Conduct additional follow-up research with displaced residents regarding: (a) factors that assisted and hindered their ability to find adequate and affordable housing following displacement, (b) the social and economic factors that residents incurred, and (c) the characteristics of their new housing arrangements. A focus of this research should be to determine why displaced residents believe they are better off in their new surrounding.
 - Findings from this research could be used to revitalize and upgrade currently deteriorating mobile home communities.
2. Research is needed that explores community development and economic options for preserving mobile home communities, (including the upgrading and/or replacement of older units) and avoiding closure.
 - Research could examine existing initiatives in areas of the State of Florida that

EXAMINATION OF MOBILE HOME COMMUNITY CLOSURES

seek to balance the rights of land owners to maximize the economic benefits they derive from land tenure with the rights of mobile home owners and renters (for example, the Manufactured Home Task Force of Pinellas county). Research could examine the success rate of these task forces at achieving their objectives.

- Research could examine the barriers to and success rate of efforts such as converting mobile home community ownership to cooperative ownership where community residents buy the community from the owner.
 - The findings of this research would provide insight into the cost-benefit of such measures at preserving affordable housing while also protecting land ownership.
3. Because land use changes and community redevelopment efforts lead to mobile home community closures and displacement, the poorer residents of these communities tend to suffer the most.
 - The IHRC recommends that the State of Florida create an assistance program, beyond the Florida Mobile Home Relocation Trust Fund, to provide subsidies, monetary inducements, and technical support to help mobile home residents preserve their specific communities and afford safer housing in general.
 4. Implement recommendations from the Affordable Housing Study Commission, particularly those that attempt to assist mobile home community residents to transition from older generation units in communities with health and safety hazards, to affordable and hurricane resistance mobile or site-built housing.
 5. Use the more than 20 generalizable recommendations from the Miami-Dade County Trailer Park Task Force report as the basis for providing county-level guidance to local governments throughout the State of Florida.

AFFORDABLE HOUSING ISSUE

Findings

1. In the State of Florida, a crisis situation is emerging in the mobile home sector. Evidence of this crisis is seen in the numerous mobile home communities that have been closed throughout the State in recent years resulting in the wholesale displacement of residents of these communities. This crisis appears to stem from three primary sources:
 - Economic forces are rapidly driving up the value of land on which mobile home communities are located. Owners of these communities receive far greater financial gains from selling the communities than from maintaining ownership.
 - There appears to be a general social stigma toward mobile homes and mobile home communities. As a result, there is a lack of interest among community residents and elected officials in preserving these types of housing arrangements.
 - There is a lack of state and local housing policies to assist mobile home communities in maintaining both safety and aesthetic standards, as well as in preserving the overall communities. At times, the zoning regulations actually prohibit communities from upgrading facilities and/or units.
2. At the same time, mobile homes serve a valuable social function for the State by providing affordable housing for a segment of the population that cannot afford to purchase more conventional single-family homes.
 - IHRC researchers found that mobile home residents tended to report lower income levels (over 30% of resident reported incomes below \$20,000) than homeowners in the State indicating that these individuals have limited financial resources to pay for housing.
 - Additionally, the majority of mobile home residents own their unit and do not have a mortgage. These individuals are then only paying to lease a lot in a mobile home community.
 - A number of mobile home residents also rent the units they reside in. IHRC researchers found that the portion of residents renting their mobile homes was greater for residents of units built during Pre-1976 standards. These individuals tend to be among the most economically disadvantaged in society and are renting these units for between \$275 and \$400 according to the Housing Subcommittee survey administered in Year 4. Moreover, because of the deteriorated condition of these older units, these individuals face the greatest risk of loss in the event of a hurricane.
3. When mobile home communities close, residents are forced to seek alternative living arrangements. These individuals who have very limited financial resources then must enter a housing market where prices have risen at levels never before seen in the U.S. (See “The Housing Market: A Brief History” in Fortune Magazine, June 13, 2005)
 - According to the American Chamber of Commerce Researchers Association (ACCRA) Cost of Living Index, the average rental prices in the State of Florida for a 900-1,000 square foot apartment (approximating similar square footage to a

AFFORDABLE HOUSING ISSUE

Pre-1976 era single-wide mobile home) is \$773, and ranged from \$566 (Punta Gorda) to \$1,057 (Miami-Dade). These prices have increased, on average, 17% from 1999 to 2004. To rent a comparably sized apartment, displaced residents are facing a drastic increase in their housing costs. Average rental fees by area are summarized in Table 1.

- Home prices have risen at an even faster rate making this type of housing well beyond the reach of displaced residents. According to the same source, home prices across the State increased, on average, 83% from 1999 to 2004. Average (Mean) home prices in the State ranged from \$201,277 (Panama City) to \$370,174 (Ft. Lauderdale). Average home prices by area are summarized in Table 1.
- As a result of the housing market conditions, many displaced residents face financial hardships in transitioning to new living arrangements. On the plus side, many displaced residents also view their new living arrangements as an improvement over their previous situation.
- However, many of the most financially disadvantaged residents often move to different mobile home communities of varying conditions.

Recommendations

1. There is a general social need for compassionate, socially equitable, affordable housing for the elderly who retire on fixed incomes as well as for the low-income families who cannot afford to move their mobile homes away from neighborhoods where they have jobs and social support and cannot find affordable fixed-site housing either for rent or purchase. The issue of mobile home community closures suggests that policy is needed at the State level. Policy needs to address two critical issues:
 - Existing mobile home communities need to be able to upgrade both facilities and individual units. Policy needs to address zoning barriers at the local level to allow for the replacement of Pre-1994 era units with either newer, safer units or site-built alternatives, as well as upgrading existing facilities and revising platting layouts within mobile home communities.
 - Options for providing alternative, affordable housing, needs to be examined and remedies need to be enacted quickly to ensure that displaced residents are able to find safe and affordable shelter.
2. Commission a program of research examining existing initiatives in areas of the State of Florida that seek to balance the rights of land owners to maximize the economic benefits they derive from land tenure with the rights of mobile home owners and renters (for example, the Manufactured Home Task Force of Pinellas county). Research could examine the success rate of these the task forces at achieving their objectives, along with potential reasons.

AFFORDABLE HOUSING ISSUE

Table 1								
Average (Mean) Apartment Rental and Home Prices by Area								
City	Apartment Rental				Home Price			
	Q2 1999	Q2 2004	Change (\$)	Change (%)	Q2 1999	Q2 2004	Change (\$)	Change (%)
National Average	603	725	122	20.2%	143,438	259,981	116,543	81.2%
<i>Florida Cities</i>								
Bradenton	687	705	18	2.6%	144,100	227,497	83,397	57.9%
Cape Coral-Ft Myers	613	774	161	26.3%	120,601	263,423	142,822	118.4%
Fort Lauderdale		1,043				370,174		
Fort Walton Beach	545	730	185	33.9%	116,848	234,180	117,332	100.4%
Gainesville		735				252,980		
Jacksonville	650	751	101	15.5%	119,010	206,722	87,712	73.7%
Miami-Dade	767	1,057	290	37.8%	150,000	319,450	169,450	113.0%
Orlando	655	789	134	20.5%	132,624	223,128	90,504	68.2%
Panama City	536	630	94	17.5%	125,737	201,277	75,540	60.1%
Pensacola	587	652	65	11.1%	119,452	250,737	131,285	109.9%
Punta Gorda		566				229,288		
Sarasota	723	807	84	11.6%	161,160	280,912	119,752	74.3%
St. Petersburg		728				220,429		
Tallahassee	663	635	-28	-4.2%	178,114	255,800	77,686	43.6%
Tampa		986				242,111		
Vero Beach		647			126,428	226,450	100,022	79.1%
West Palm Beach	798	910	112	14.0%	155,167	313,273	158,106	101.9%
Average	657	773	111	17.0%	137,437	253,990	112,801	83.4%

Note: All numbers are from the American Chamber of Commerce Researchers Association (ACCRA) Cost of Living Index. Reports published in August, 1999 and August, 2004 respectively. Apartment Rent and Home Price are average amounts in U.S. Dollars
Q2 = Quarter 2- information listed is that obtained through the end of the second quarter of that year

PRIMARY BARRIERS AND RECOMMENDATIONS

In this section, we identify the primary barriers to upgrading mobile homes and communities throughout the State, and provide a set of recommendations for addressing these barriers.

Barrier 1 – State Regulatory Environment

- There is a lack of public policy in the State addressing the needs of mobile home communities. Additionally, State-level data are not maintained to provide an accurate assessment of the number of mobile homes or the location of mobile homes in the State of Florida.

Recommendations

1. Consider establishing a Bureau of Manufactured Housing to create a single entity responsible for: (a) overseeing the maintenance and enforcement of regulations regarding mobile homes, (b) resolving the many issues surrounding the vulnerability for hurricane damage among mobile home residents, and (c) implementing a long-term initiative funded by the Bill Williams Act. This Bureau could also be responsible for establishing state-wide guidelines for jurisdiction over the enforcement of regulations pertaining to mobile homes.
2. Consider upgrading the software system used to collect and maintain the DMV registration database to include: (a) the location in which the unit is installed, and (b) a way to link mobile home units that are registered individually, but are halves of double- or triple-wide units.
3. Consider establishing a web-accessible master database of mobile home community property information (zoning, tax, resident demographics, enforcement actions, etc.) that is accessible by all enforcement and housing assistance agencies.

Barrier 2 – Knowledge Gaps among Local Officials

- There appears to be wide-spread knowledge gaps among county and municipality sources regarding regulations affecting the installation, rehabilitation, and safety of mobile homes in those communities. These gaps lead to confusion regarding levels of jurisdiction and enforcement responsibility among officials, create barriers to maintenance for owners of mobile home communities and units, and increase the risk of loss in the event of a hurricane.

Recommendations

1. Consider revising the Florida Building Code to include mobile home installation requirements. This will provide a single, comprehensive resource for mobile home owners in the State, and will hopefully ensure that units are installed in the manner most likely to withstand damage in the event of a hurricane.

PRIMARY BARRIERS AND RECOMMENDATIONS

- At the very least, the State should consider mandating that local building and zoning codes be revised striking any references to mobile home installation and instead make reference to Florida Department of Highway Safety and Motor Vehicles Division Rule 15C-1 in their building codes. This rule contains both “descriptive-based” and “performance-based” specifications for all of the necessary components used in the installation of mobile homes.
2. Undertake a comprehensive outreach/educational effort to ensure that county and municipal authorities are well informed about the levels of jurisdiction and responsibility regarding installation, modifications, and inspections of manufactured housing. This outreach effort should include mobile home dealers, mobile home owners, and mobile home community owners and managers as well.
 - Prior to undertaking the outreach effort, commission a program of research to: (a) identify the extent of knowledge gaps regarding the regulatory environment on a state-wide basis, and (b) the most effective methodology for educating the target audience.
 3. IHRC researchers found an extensive number of on-site modifications to mobile homes after installation. These modifications could adversely affect the structural performance of the units during a hurricane event. The State should consider commissioning a program of research to identify and classify the various types of on-site additions to mobile homes. This information is needed to study how the types of additions affect the structural performance of the unit under hurricane conditions.
 - This research would be used to: (a) develop mitigation measures to reduce potential damage, (b) propose policy alternatives for comprehensive mitigation programs, and (c) implement community outreach and educational programs for mobile home residents and local governments having jurisdiction over installation.

Barrier 3 – Community Zoning, Rezoning, and Annexation Restricting Land Use

- Existing zoning laws and building codes may restrict land use in mobile home communities, creating barriers to developing new mobile home communities and upgrading existing mobile home communities.
 - Some municipalities require large lot sizes for mobile home communities in areas with limited vacant land. These requirements make the development of new mobile home communities economically unfeasible.
 - Zoning regulations often specify minimum lot size requirements for site-built homes and current lot sizes are too small to accommodate such requirements.
- Annexation of land and rezoning of land on which mobile home communities are located is one of the greatest barriers to upgrading mobile homes and mobile home communities. Following rezoning or annexation, mobile home communities are often no longer in

PRIMARY BARRIERS AND RECOMMENDATIONS

compliance with current zoning regulations. As a result, owners and residents of communities are frequently barred from modifying the community or replacing units, which puts residents at increased risk of loss and the surrounding community at increased risk of damage from debris in the event of a hurricane.

Recommendations

1. Consider creating public policy to exempt existing mobile home communities from restrictions placed on them from community rezoning and annexation. These exemptions are critical for several reasons:
 - They will allow owners to upgrade community facilities to be more resistant to wind damage and more aesthetically pleasing for the broader community,
 - Allow for rehabilitation and/or replacement of existing units that were built during the Pre-1994 era and complete replacement of Pre-1976 Era units,
 - Allow owners to explore options for re-platting existing community layouts to accommodate newer mobile home units and/or site-built or site-assembled structures.
 - Preserve a form of affordable housing needed by a significant portion of the State's population.
2. Consider creating public policy allowing for the easing of minimum lot size restrictions in mobile home community upgrade initiatives. This policy would allow community owners to explore options for replacing older mobile home units with small, site-built homes.
3. Commission a program of research into the estimated financial and social costs/benefits of replacing existing mobile homes with small site-built/site-assembled houses that provide greater safety for the residents, and appeal to the county or municipality.
 - This program of research should explore funding options to cover the costs of mobile home community conversion efforts, including community grants, housing subsidies, and state-subsidized low-to-no interest loans.
4. Undertake a comprehensive outreach/educational effort for county and municipality officials that encourages officials to develop long-term community plans to ensure the continued availability and future development of mobile home communities within the larger community. These plans should state that only Post-1994 era mobile homes be installed, and include flood hazard zoning ordinances to make these communities less vulnerable.
5. Undertake a comprehensive outreach/educational effort for residents of mobile home communities regarding maintenance/upkeep endeavors which could help to curtail the pressure felt from local officials to close poorly maintained communities.

PRIMARY BARRIERS AND RECOMMENDATIONS

Barrier 4 – Financial Constraints of Mobile Home and Mobile Home Community Owners to Upgrading Units

- Costs associated with upgrading mobile homes can be extensive. Individuals who live in mobile homes frequently have a limited income, and are thus less likely to lack the necessary resources to upgrade their homes. Additionally, the costs associated with upgrading mobile home communities can be extensive for community owners who are likely to see a limited return on their investments.

Recommendations

1. Undertake an outreach/educational effort targeted at mobile home community owners and managers to promote the creation and maintenance of the DCA on-site shelter program.
2. Consider creating an assistance program, beyond the Florida Mobile Home Relocation Trust Fund, to provide subsidies, monetary inducements, and technical support to mobile home owners to be used to supplement the costs of replacing existing older units.
3. Consider creating an assistance program for mobile home community owners to support upgrading existing facilities and replace older mobile home units.
 - Commission a program of research into the feasibility of grants, State subsidized low-to-no interest loans, tax breaks, or some combination.

Barrier 5 – The Florida Housing Market and Rapidly Increasing Land Values

- The housing market has risen at a rapid pace in recent years and land values are at a premium. As Florida cities expand, mobile home communities face pressures to close for community re-development efforts. Enormous financial incentives exist for owners of mobile home communities to sell their land to real estate developers, while the financial incentives for continued ownership of mobile home communities are minimal. The financial incentives to re-develop mobile home communities extend to the community government level as well due to the potential for increased tax revenue generated from higher-end residential or commercial construction.

Recommendations

1. Commission a program of research to examine the barriers to, and success rate of, efforts such as converting mobile home community ownership to cooperative ownership where community residents buy the community from the owner. The findings of this research would provide insight into the cost-benefit of such measures at preserving affordable housing while also protecting land ownership.
 - Once this research is complete, undertake a comprehensive outreach/educational effort for residents of mobile home communities regarding alternative land ownership models.

PRIMARY BARRIERS AND RECOMMENDATIONS

2. Long-term community planning efforts (as recommended to address Barrier #4) should help to slow the degradation and closure of mobile home communities.

Barrier 6 – Lack of Comparable Replacement Units

- Based on an examination of existing efforts to rehabilitate existing mobile homes, the IHRC concluded that it is not economically feasible to rehabilitate existing Pre-1994 mobile homes to adequately increase the structural integrity of the unit. Therefore, older units will need to be replaced with newer models, however, these models tend to be larger and may not fit on existing lots particularly given set-back restrictions. Because of zoning requirements, replacement units need to be of a similar size to fit into existing lots.

Recommendations

1. Commission an investigation of mobile home manufacturers who build smaller units that would fit into existing lots. Explore options for the provision of financial incentives to mobile home manufactures for building smaller models.
2. Commission research to examine the structural integrity of park-built model homes to determine their ability to withstand damage during a hurricane event. Research should also explore reactions of residents to this style of mobile home.

Barrier 7 – Social Stigma Regarding Mobile Home Communities

- The social stigma problem goes beyond the mere negative opinions and attitudes held among many individuals in the general public regarding mobile homes, and goes to the heart of actions and inactions among community members and public officials that lead to each of the first six barriers.

Recommendations

1. Community outreach efforts aimed at county and municipality long-range planning efforts (recommended to address Barrier #4) will help to balance the needs of municipalities and residents of mobile home parks.
2. Efforts to provide outreach/education to mobile home residents and financial support for the rehabilitation of community facilities or units, and the replacement of older units, will help to address safety concerns, as well as update mobile home communities that fall into despair.
3. Allowing mobile home communities to replace mobile units with small, site-built or site-assembled structures may help to provide more accepted forms of housing for municipalities, and provide affordable housing for those who need it.

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