

Manufactured Homeowners Who Rent Lots Lack Security of Basic Tenants Rights

December 2000: Consumers Union staff visit Bergstrom Mobile Home Park, slated for redevelopment after decades of operation. Residents say they cannot find spots to relocate their homes, nor can they afford to purchase homes from the new owner, Palm Harbor. Many parks are full, and those that have spaces will not accept older models and/or styles of homes.

February 2001: Residents of an 80-unit Grapevine mobile home park must move out because Four Peaks, a company that bought the property to redevelop it, plans to build single family homes priced up to \$300,000. "We have single mothers with no place to go in this area," a resident told City Council. "Tell me, what are we to do?"¹

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And very special thanks to Legal Aid of Central Texas for research assistance and information about individual complainants.

In Brief

Unlike apartment dwellers, manufactured home occupants who rent the space upon which their unit is placed currently have no legal rights if a park owner decides to terminate their stay. These families have no right to a written lease under law, and are typically on month to month tenancies. This situation leaves them without basic landlord-tenant protections.

Although manufactured homes are often referred to as mobile homes, they are far from mobile. Few homes are ever moved from their original installation. The cost and difficulty of moving these homes place such tenants in a uniquely disadvantaged position when dealing with landlords who can give them 30 days notice at any time.

This poor bargaining position leaves residents at risk of landlords' demands of more money for rent, utilities, or other services. Unexpected expenses are especially difficult for those on fixed income, such as retirees. National studies have shown that those of retirement age are overrepresented in manufactured housing. Under

constant threat of eviction, tenants will lose almost any conflict with landlords.

Despite the unique problems facing these manufactured homeowner-tenants, under current Texas law they have neither the rights nor the protections afforded apartment dwellers or conventional homeowners. Such protection is needed if manufactured housing is ever to become a safe, stable environment for Texas families.

● Manufactured home owners who lease a lot in a manufactured home community in Texas have no laws protecting their rights, and are frequently trapped by skyrocketing rents, utility

costs, and community fees.

● The cost to move a manufactured home severely limits a renter's choices, and renters sometimes suffer significant personal loss if they must sell the home back to the community owner or a dealership at fire-sale prices.

● Renters should have strong protections against rapid and high rent increases, rights to a renewable long term written lease, and protections if a community is sold for redevelopment and homes must be sold or moved quickly.

General Findings

Traditionally marketed to retirees and very young families, today in Texas manufactured homes have captured a broad market among all kinds of people seeking affordable housing. The December 2000 Current Population Survey reports 1.2 million Texans live in mobile homes.

Manufactured home occupants in Texas tend to be younger and have incomes several thousand dollars higher than manufactured homeowners nationally, reflecting the wider acceptance of such housing here. The median age of Texas

occupants is 29, and the median household income is roughly \$30,000. There are also noticeably more children in manufactured

housing in Texas: 37% of occupants are under the age of 18, vs. 29% nationally.²

Most manufactured home residents live in and near

August 2000: the San Antonio Express-News reports on the plight of a 90 year old retired school teacher. After 38 years in the same mobile home park, the landlord gave all the residents a 30 day notice to move off. Three days before the deadline, fewer than half of the residents had been able to arrange to move their homes.



urban areas. 68% of Texas manufactured houses are found in urban areas, and 11.5% of all mobile homes in Texas are in the Houston PMSA (Primary Metropolitan Statistical Area). Another 9.9% are in the Dallas PMSA. Rural counties generally have a higher percentage of the population living in manufactured housing, but many of the rural counties with a very high ratio of manufactured homes are sparsely populated (see tables below).³

Manufactured homes are an attractive alternative for many Texas families because down-payments and monthly payments are generally lower than those for site built homes. Often, part of the up-front cost savings comes from placing the home on rented lots.

In Tarrant County, for example, 65 percent of manufactured home owners do not own the land on which the unit is placed. Percentages may be slightly lower, but still significant, in rural

counties.⁴ National statistics about manufactured home loans indicate that less than 10% of loans include both home and land as collateral.⁵

In 1999, there were 256,323 manufactured homes placed on rented lots in the state of Texas.⁶ The tenants, about three quarters of a million people, rely upon their lots for space to live.



Unlike regular renters, however, these tenants have no protection under Texas law. And also unlike regular renters, these tenants stand to lose thousands of dollars in moving costs if

they have to leave their lot. The industry estimates moving costs for manufactured homes to be \$1500-\$3500.⁷ Moving a home can cause structural damage as well. A manufactured home retail salesperson told Consumers Union staff that after moving, homes often look like they have been through an earthquake, and require significant work to repair.

Most people who live in manufactured homes today live in the state's most populous urban counties.

County	Number MH titles
Harris	37,639
Hidalgo	26,509
Bexar	19,575
Montgomery	19,334
Tarrant	17,725
Dallas	17,220
El Paso	15,693
Travis	14,118
Denton	12,562
Johnson	11,941

Top Ten Counties by Number of Manufactured Home Titles.
Source: MH Current Titles dbase, Texas Department of Housing and Community Affairs.

In rural counties, a greater share of the population lives in mobile homes.

County	MH/1000 pop
Loving	322.2
Sabine	187.2
Mcmullen	180.3
Trinity	153.1
Leon	140.9
Coke	125.9
Bandera	124.4
Burleson	120.8
Henderson	120.5
Shelby	120.5

Top Ten Counties by Number of Mobile Homes per 1000 People: Source: MH Titles dbase, Texas Department of Housing and Community Affairs.

Terminology

Manufactured homes are often called mobile homes or trailers. The industry encourages the use of the term "manufactured home" for units built after 1976, but only 10% of residents have adopted this terminology.¹

In this report, we follow common practice and use the terms interchangeably.

Source: Foremost Insurance "1999 Market Facts"
Internet Source: http://www.foremost.com/market_facts/

Even if owners have the money, these tenants may not be able to find a place for their homes because many parks are full or won't take used homes. Once a park fills, turnover of units is very low: usually owners sell the unit in place in a park. Sun Communities, a park development company active in Texas, estimates only about 3% of its occupied lots open up a year.⁸ Newer parks, which have open spaces yet to be filled, often don't accept used homes.

State Laws

There are over 1,300 manufactured housing communities in Texas.⁹ Some of the larger communities are owned or controlled by manufacturing companies like Palm Harbor, Champion, or Clayton Homes. The larger multi-state corporations are used to working under regulation. As of 2000, 37 states had regulations covering landlord-tenant relations relating to mobile home owners.¹⁰ (See Inset Map)

Clayton runs 75 manufactured home communities across the country, including 26 in Texas.¹¹ These communities lease land to new manufactured home buyers. Other national or multinational companies operate parks here as well. Most larger new parks are run by large companies or development funds. The Austin Edition of the 2000 Manufactured Housing Community & Land Guide lists only seven parks currently leasing spaces in Austin (there are dozens of parks in the city). Of those seven parks, all of them are owned by companies based out of state.¹²

The 37 states with laws governing lot rentals have recognized the potential

Texans purchased more manufactured homes than residents of any other state in 1999,¹⁵ and our state has more parks than all but two other states.¹⁶ In fact, Texans bought more homes than people in 25 other states combined – 25 states, of which 22 have laws covering mobile home park residents. Despite the prevalence of manufactured homes here, people who lease the land but own their home have neither the legal protections afforded homeowners, nor those afforded conventional renters. They fall between the cracks.

The specific problems facing mobile homeowner-tenants are caused by the imbalance of power resulting from making a long term investment in a home placed without the protections of a long term lease. Once placed, homeowners will have little opportunity to move their home without suffering financial harm. Homeowners have no rights, despite the fact that the combined investment of homeowners in a park may surpass that of the park owners. An examination of the tax appraisal rolls for the Regency Village community in El Paso reveals that homeowner property is valued at over 2.5 times that of the park owner.¹⁷

Carolyn¹⁸ is 64 years old, and lives in a mobile home park where she rents a lot. She is disabled, and lives on a fixed income: her monthly \$512 SSI check. When she came to Legal Aid for help, she had lived in the same park for 9 years on an oral month to month contract. Over the years she had built out a permanent

[illegible]

have to move with only three days notice if the landlord claimed she had violated her lease.

The most important reason that manufactured homeowners need the option of a long-term lease is that without one, they have no rights. Tenants living on a month-to-month contract can be given 30 days notice at any point in time, no reason required. Thirty days gives tenants neither sufficient time to locate a new site nor raise the necessary money to move the

Ten years ago, Deborah Chapman bought a manufactured house in Strasburg, Pa. Like many young people, she had opted for manufactured housing because she couldn't afford the down payment for a site-built home. When she was ready to trade up, however, her landlord, who had written into the lease the right to approve any subsequent buyer, rejected each of the six people who made an offer on the \$9500 home. He then made a lowball bid of his own for \$2000.

Rather than abandon her home, Chapman paid some \$1500 to have it moved to a new location, where it sat empty until she sold it a year later for \$7000. She used the proceeds to pay legal costs she'd racked up fighting her landlord, in the end netting nothing for all the trouble she went through. Says Chapman, who is now the chairwoman of the National Foundation of Manufactured Home Owners, "Had I been forced to sell, the landowner would have sold my home for much more than he paid for it."

— "Dream home... or nightmare?" *Consumer Reports*, February 1998

— "Dream home. . . or nightmare?" *Consumer Reports*, February 1998



home. Nationally, 84% of mobile home occupants have lived in a mobile home for more than 5 years, and over half plan on living in their current homes for the rest of their lives.¹⁹ Yet for many, lack of a long term lease places their future on perilous ground.

Without a long term lease, non-renewal may happen at any time- after years in a park, or merely months later. The Roberts family of Austin bought a

new house, signed a month to month lease, and moved in. Just months after investing in the move and installation, they had a disagreement with park management over whether or not the husband was listed on the lease. Management decided not to renew the monthly contract, and they were forced to pay to relocate their home

Park Closures

Many mobile home parks were built decades ago on low cost land outside of city limits. Today, that land is prime real-estate, often sold for large-scale commercial or retail development. For example, recently Home Depot purchased a mobile home park outside of Longview with plans to develop a store on the site.²⁰ Sections of Bergstrom Mobile Home Park in Austin are being closed for the opening of a manufactured home retail center.²¹ This year, the Grapevine City Council approved the redevelopment of an 80-home park into a single-family residential area with homes priced up to \$300,000 on 7,500 square foot lots.

When parks close, dozens, if not hundreds, of homeowners are left searching for spaces to relocate. Under normal circumstances, the number of available spaces for used homes are limited. The closing of a park not only reduces the supply, but also increases the demand for spaces. This is exacerbated by rules in many parks excluding used homes, homes with metal roofs or siding, or other limitations (See park rules, below). All the residents of the old park end up attempting to move to the same few spots that will accept their homes. Many Grapevine residents told their City Council that they have been unable to arrange to move their bulky homes and have considered abandoning their investment. Despite five months notice, Bergstrom residents told Consumers

When Park Owners Redevelop, Tenants May Have Few Options

After decades of operation, the residents of Hillside Mobile Home Park in Bexar County were given 30 days notice. The land was rezoned for commercial development and being cleared. Three days before the deadline, fewer than half of the residents had been able to arrange to move their homes.

Each of the households has been disrupted by the action. Cesar Martinez laments the lack of warning. He thinks with more warning, he could have saved enough to purchase some land and move his home. He is still paying installments on his home.

Henrietta Castanon, a 86 year old resident, sold her home at less than a third of its appraised value. She moved into a home already occupying a lot in another park. Another elderly resident, living on a Social Security check of \$500 per month, received offers of aid from local moving companies after her plight was aired on a television newscast.

Rae Jean Alonso moved to an apartment building, abandoning her yet unsold home. Keeping her son in the same high school was a priority that limited her moving options.

Dana Walters, a 44 year old nursing student, had trouble getting other parks to return her calls looking for spaces. Her other attempts to find help were also unsuccessful. Walters contacted the [Texas Manufactured Housing] Association but received no help. "These people only represent the (park) owners."

Source: "Zoned Out of a Lot ; Mobile-home owners in manufactured mess," San Antonio Express-News, August 27, 2000.



Union that they have also been unable to move and place their homes elsewhere. A study of two park closures in Oregon estimated that it would take 14 years for local parks to absorb the used homes displaced by the closures.²²

Rent increases

Without a lease, renters are at the whim of the owners. Month to month renters may have some “understanding” about rent with the current owners, but such “understandings” can leave the renter out in the cold, especially if park ownership changes. Ownership changes can be relatively common: one real estate web site currently lists 59 mobile home parks for sale, representing about 4,900 lots in Texas.²³

Shortage of spaces, combined with the immobility of manufactured homes, gives park owner/operators extraordinary leverage to exact large increases in rents and other fees. According to AARP, rent increases of 50 to 60 percent are not unusual.²⁴ Rod Nelson at Legal Aid of Central Texas (LACT) recalls one park where rents jumped from \$350 to \$500 a month. For a renter on a fixed income, unbudgeted rent increases can be devastating.²⁵

Park Repairs

Landlords rent out spots for placement of manufactured housing. As such, they are responsible for the roads, sewers, water pipes, and electrical system of the

community. That environment is important to all the residents. Not only is this important in terms of health and safety (especially for the 37% of all mobile home residents that are under the age of 18), but the park environment is an important factor in the value of the home for the homeowner. With no minimum standards, no lease, and few other options, residents can be trapped in unsafe or unsanitary living conditions surrounding their homes.

The National Housing Institute reports: “Mobile home parks effectively put landlords in the position of local public works director, in charge of roads, sewers, water pipes, and electrical systems, seriously magnifying the effect of an owner who neglects repairs. Park owners, like many landlords, are also known to cut corners when they do make repairs. [Janet]

Dermotty [of Vermont’s Mobile Home Park Project] recalls a landlord who installed an old oil drum in place of a septic tank.” Faulty wiring caused two fatal accidents in a California park in 1998.²⁶

Control of local utilities is often used by parks as another source of revenue. Surcharges on water services of up to 9% of the bill are allowed under current Texas law.²⁷

Parks Restrict Access

Parks often restrict access based on the age, brand, or size of a mobile home, and on the type of materials used in construction. Some parks restrict the choice of tenants by restricting the brands accepted for placement. Colorado Real Estate and Investment Company (CREICO) has a section of one of their Travis county parks reserved for homes manufactured by Oak Creek (a division of American Homestar). CREICO has over 1,800 spaces in Texas in 11 parks.²⁸ Tying of products like this not only restricts consumers’ ability to make choices in products, but fear of eviction may limit their ability to complain should there be a problem with the purchase.

Nelson Mock, an attorney at LACT, recalls such a case. A client had purchased a used mobile home from the park owner. Shortly after moving in, he found that there were problems with the installation: specifically, the heating and air conditioning were not functioning properly. The client withheld rent payment from the park in protest, and in return was given three days notice to move his unit off the premises. As more manufacturers get into the park development business, these types of issues are positioned to become a larger problem. Texas law puts mobile home owners in a bind on installation. The home owner is responsible for site preparation, but if the lot is rented the owner has no control over whether a site is properly prepared.

Studies estimate at least half of major

problems with manufactured homes are caused by improper installation.²⁹

New home covenants restrict the options for placement of used homes, thereby making it difficult to relocate from a bad park situation. These covenants can also be used to force

homeowners to remove the home if the home ownership changes. Due to the high interest rates on manufactured home loans, the cost of moving a home (including damage caused by transit) can easily destroy years of equity owners may have earned on their units.

The tying of purchases is not restricted to homes themselves. For example, “Deerwood,” a manufactured home community in Austin, requires the tenant to purchase *from Deerwood* a list of items. This list includes a storage shed, skirting, and deck – all items that are available on the open market.³⁰ Once again, consumers are losing choices.

Parks may require approval from the park management before a new owner may move into the home. It is not uncommon for park owners or management to be involved as a bidder or agent

“Some parks require an in-home inspection to be performed by park management before a homeowner can even put their home—their property—up for sale. In-home? We can concede some on outside the home inspections, but in-home?” - MFG Housing News

Internet Source: http://www.mfghousingnews.com/park_owners_business_tactics.htm



on in-park resales. This creates a potential for abuse of the approval process. (see sidebar)

Community Rules

Parks often further restrict options through use of extra rules and regulations. Many parks have a long list of community rules. These rules can help regulate the community for the benefit of all. However, rules can also become arbitrary and infringe upon the rights of the individual homeowner. Landlords can evict on short notice for violation of community rules.

Some community rules allow the landlord entry (at will) into the homes owned by the residents. One resident believed the landlord had entered his trailer and removed property. Less than a year after this dispute, the landlord evicted him.

Another homeowner was given 30 days notice because park management felt that drying clothes outside of her home was a violation of community rules. She was especially upset to leave the many improvements she had made on her lot space.

The Austin Hills Mobile Home Estates explicitly prohibits its residents from organizing through the use of petitions. This park also charges the tenant for any work done on the leased lot but retains ownership of the improvements. The community rules at this park

require the tenant to give 30 days notice before vacating, but allow management to terminate the tenancy, effective immediately, for violating any part of the rental agreement. Other specific rules include: children must be quiet and orderly, and bikes may not be ridden to the community pool.³¹

Recommendations

Give Manufactured Homeowner Tenants warning before closing parks. Twelve months warning should give all the residents enough time to locate spaces that would accept their homes. It would also give the tenants time to make an offer to buy out the current owner of the park and continue operating it themselves.

Clarify the relationship between homeowner and the park owner. Give tenants the right to a one year, written, renewable lease that clearly discloses rent levels and the rate of rent increases.

Require landlords to show good cause for evictions. Evictions can cost homeowners thousands of dollars in moving costs and damage to units.

Respect the individual rights of the tenants and require community rules to relate to the health, safety, and welfare of park tenants. Void unreasonable and arbitrary park rules and return the rights of privacy and freedom of speech and petition to homeowners. These homeowners are not renting the home: it is their property. Landlords should not have a right of entry except in emergencies.

Current Legislation

H.B. 557 would provide some of the protections needed in Texas. This bill:

- Requires renters to have the option of a one-year written lease. This is the law in at least 13 states, including Illinois, Iowa, Washington and Florida. Written leases are required or must be offered in 24 states.

- Requires renewal of leases.
- Requires 12 months notice prior to park closures. At least 20 states require notice of change of use, including New Mexico, Ohio, and Nevada.
- Provides legal protections equivalent to those of tenants under the Property Code on matters such as security deposits and repair/repair-payment procedures. At least 28 states, including Arizona, Minnesota, Oregon and Florida require landlords to show good cause for evictions.
- Prohibits evictions without cause.
- Prohibits interference by landlords in the sale of a home, landlords from requiring that tenants use them as a sales agent, and prohibits landlords from requiring that tenants move the home out when they sell it.



States Legislate a Wide Variety of Protections Designed to Help Families Maintain the Equity in their Home and Enjoy a Secure Future

Provision	Florida	Illinois	Arizona	Maine	Oregon	California
Required (or required to offer) one year lease	X	X			X	X
Good cause eviction	X	X	X	X	X	X
Notice of change of use (park closure)	X		X	X	X	X
Cure provision (right to pay back rent to prevent eviction)	X		X	X	X	X
Prohibits unreasonable rules and regulations		X	X	X	X	
Prohibits required removal of older homes on sale			X		X	X
Right to relocation expenses	X		X	X	X	X
Creates landlord maintenance and habitability obligations	X	X	X	X	X	

This bill does not:

- Require multi-year leases. Long term leases provide the long-term stability and predictable rent increases which would be needed to make manufactured housing a housing option for those living on a fixed income. The National Communities Council, a park-owner industry group, recently found that leases five years longer than financing terms (i.e. 35 years for a 30 year loan) would be needed to obtain conventional financing on manufactured housing.³²
- Address “tying” of manufactured homes or required services. Consumers should have access to the whole market when buying homes or add-ons. The Urban Land Institute found that “in all but three states, the developer must admit any home that meets the communities design guidelines.”³³ Our lack of a specific statute leads us to believe Texas is one of those three states.
- Provide right of first refusal. Residents should have the opportunity to buy the park out at the same price as other purchasers to prevent change of use. At least six states provide for this.
- Prohibit forced removal of homes from parks because of age. Once accepted into a park, a home should not be forced

out of a park solely because of its age or model. At least seven states provide for this.³⁴

Texas has a long way to go to protect this unique class of homeowners. They need access to stable, safe, and fair environments for placement of their homes. It is time we act to give them the rights they need. HB 557 is a long overdue first step.

Endnotes

¹ Dickson, Gordon, “Mobile Home Tenants will be forced to move; Grapevine approves single-family houses for park,” Fort Worth Star-Telegram, 2/21/01. Unless specifically citing to other sources like news clips, all personal examples were provided through interviews with Legal Aid of Central Texas (LACT).

No Protection from Eviction, Even After 16 Years

Ms. Lopez came to Legal Aid of Central Texas in the fall of 1998 with a problem: her landlord had given her a 30 day notice to vacate her lot of 16 years. The park manager claimed that Ms. Lopez had failed to repair a water leak, her lot was not well kept, and an air-conditioning unit had been on her porch for over a month.

70 year old Ms. Lopez had attempted to get the water leak fixed previous to her eviction notice. The repairman, however, refused to work on her water because of standing sewage in the area around her home, caused by problems with the park sewage system. The worker felt it was dangerous to work under such conditions. Several boxes and some furniture were outside her unit from her daughter’s recent move, awaiting rental of a storage unit. The air-conditioning unit, which was functional, was on her porch while she waited for help to move it into storage.

Ms. Lopez had no recourse under current statutes in Texas. Her 16 year residency could be terminated with little notice or provocation. In this case, because the absentee landlord drove by her property and didn’t like what he saw from his car window on that day.

Source: Interview with Legal Aid of Central Texas personnel.
Name of tenant changed to protect her privacy

Consumers Union

² December 2000 Current Population Survey, Bureau of Labor Statistics.

³ Number of Titles from Texas Department of Housing and Community Affairs (TDHCA). Titles by county report, August 2000. County Populations from "Population Estimates Program January 1, 2000 Estimates of the Total Population of Counties", Texas State Data Center. County type from Comptroller of Public Accounts: Reference Table, County Definitions.

⁴ Tarrant Appraisal District, 2000 State Use Code Statistics, September 2000. In rural counties, land ownership is more common. In Angelina County, for example, nearly two thirds of manufactured home owners own their lot.

⁵ Manufactured Home Financing 1998, Manufactured Housing Institute

⁶ State Summary of School Reports of Property Values, Comptroller of Public Accounts, 1999. Texas A&M University Real Estate Center, 2001 Real Estate Review and Outlook, January 2001, p.7. Texas A&M estimates that 2.8 people live in a manufactured home in Texas. Our estimate uses the number of rental homes reported in property tax roles, minus the estimated number of vacant homes, multiplied by 2.8 persons per non-vacant home.

⁷ Testimony by Steve Rogers of the TMHA before Texas House of Representatives, Urban Affairs Committee on 8/30/

00.

⁸ December 1999 10-K, Sun Communities, Inc. Pg. 5.

⁹ Internet source: <http://www.Mobilehomeparks.com>

¹⁰ Unfair and Deceptive Acts and Practices Manual, Cumulative Supplement 2000, National Consumer Law Center.

¹¹ June 1999 10-K, Clayton Homes, Inc p. 9 & p. 11.

¹² Travis County Appraisal District, Appraisal Roll search, www.traviscad.org, and Securities and Exchange Commission information about company ownership and affiliates.

¹³ Unless otherwise cited, information on state statutes is from: Manufactured Housing Park Tenants: Shifting the Balance of Power. AARP 1991.

¹⁴ Oregon Revised Statutes Title 10 §90.632.

¹⁵ "Statewide Manufactured Home Shipments (1970-1999)" National Conference of States on Building Codes and Standards, as reported by the Manufactured Housing Institute.

¹⁶ According to www.mobilehomepark.com, California and Florida have more parks than Texas. Both of these states have laws covering lot rental, including the requirement of offering a one year lease.

¹⁷ El Paso County Appraisal District 1999 tax values. A study in Oregon found "The combined investment of the homeowner's averages a 65% greater investment than

that of the park owners" Manufactured Home Owners of Oregon, inc./OSTA. Internet Source: <http://www.mhoo-osta.com/html/facts/html>

¹⁸ Names of tenants have been changed to protect their privacy in all stories.

¹⁹ Foremost Insurance "1999 Market Facts" Internet Source: http://www.foremost.com/market_facts/

²⁰ 2000 Real Estate Market Overview: Longview-Marshall MSA, the Real Estate Center of Texas A&M.

²¹ Interviews with Park Residents, Dec 2000 and Feb 2001.

²² "The Problem of Mass Evictions in Mobile Home Parks Subject to Conversion" Michael Sheehan and Roger Colton, Fisher, Sheehan and Colton Public Finance and General Economics, December 1994 p. 9.

²³ Internet Source: <http://www.mobilehomeparkstore.com>

²⁴ AARP, 1991, p. 3.

²⁵ Personal Interview, February 2001.

²⁶ "Homeowners, and Tenants Too" Shelterforce, July/August 2000, National Housing Institute.

Internet Source: <http://www.nhi.org/online/issues/112/rosenbloom.html>

²⁷ Texas Natural Resource Conservation Commission Chapter 291 – Utility Regulations subchapter H rule §291.124.

²⁸ Internet Source: <http://www.creico.com/texas.html>

²⁹ "Final Report," National Commission on Manufactured Housing, August 1, 1994, p. vi & p. 54.

³⁰ "Home Specifications," Deerwood Sales package.

³¹ "Rules and Regulations" Austin Hills Mobile Home Estates, dated 8/97.

³² "Conventional Mortgage Financing On Homes in Communities a Reality," Communities Council, Summer 2000.

³³ Manufactured Housing: An Affordable Alternative Diane Suchman, Urban Land Institute March 1995.

³⁴ Manufactured Housing Park Tenants: Shifting the Balance of Power. AARP 1991 And Oregon Revised Statutes §90.632



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