

Uncovering the health harms in Homes of America's manufactured housing communities





## **Executive Summary**

They [Homes of America] have made it so miserable for us. We used to love to come home. This was our home. We thought we could live here until we died and our life is so miserable, so miserable. This place has ruined our life, our health, and our future.

Barry Yost, Shadow Wood Mobile Home Park, West Virginia

Shadow Wood Mobile Home Park, where Barry Yost lives, is one of five manufactured home communities in Mercer County, West Virginia, that Homes of America, LLC purchased as part of its major buy up of manufactured home communities across the Midwest and southern US in recent years. The company, which began its buying spree in 2021, now owns at least 144 manufactured home communities, most of which are in Florida, Michigan, and Illinois.

About 15% of the US population lives in manufactured homes, with nearly 30% of those residents reporting that they are disabled, retired, or unable to work. Traditionally, manufactured home communities — also known as mobile home parks — have provided a vital affordable housing option for people on low or fixed incomes, including the elderly, working class people, immigrant families, and people living with disabilities. Now, large corporate landowners like Homes of America are changing that.

Homes of America follows a playbook that is characteristic of corporate landowners focused on maximizing profit: they impose steep rent increases and fees while neglecting basic maintenance and upkeep. These practices maximize short-term profits while leaving residents to deal with hazardous living conditions, financial strain, and associated health impacts. In general, private equity models of housing can be especially harmful for communities because investors may not have any incentive to keep parks in decent condition, or even directly profitable. Private equity companies earn large amounts of money through complicated financial maneuvers, such as purchasing manufactured home communities only to take out loans for other investments.

In 2024, Private Equity Stakeholder Project and Manufactured Housing Action published research describing Homes of America's rent increases and resident displacement through evictions. Building on this research, we investigated the public health implications of Homes of America's manufactured home ownership practices, as indicative of broader national trends in corporate ownership of manufactured housing parks and other types of housing.

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## Our research found that the unhealthy conditions in the Homes of America communities we examined are linked to serious health impacts.

We draw on in-depth interviews with 20 residents of Homes of America communities in Michigan, Virginia, West Virginia, Illinois, and Florida, as well as an extensive examination of public records obtained through request, including housing code inspections in 10 communities.

Our research found that the unhealthy conditions in the Homes of America communities we examined are linked to serious health impacts. We also found that the combination of rent hikes, eviction threats, and habitability issues leave residents feeling stressed and trapped, with nowhere to go. Residents described serious physical and mental health effects of the stress, including vomiting, migraines, fluctuations in weight, high blood pressure, depression, and anxiety. With the stark imbalance of power between residents and Homes of America, residents also described a lack of control and feelings of powerlessness over their living conditions, which have been shown to contribute to adverse health outcomes.

## **Key Findings**

### Poor drinking water quality

Several Homes of America communities were found in violation of water quality standards by regulatory agencies. Potential contaminants, like lead and bacteria, may have contributed to residents' gastrointestinal health and skin issues. All residents we spoke with resorted to buying bottled water to protect their health and described the financial burdens associated with purchasing water and repairing appliances and fixtures damaged by the water supply.

I had the worst stomach ache, and I went to my doctor with the water report, and I asked him... 'Could this be making me sick?' And he [the doctor] said, 'Looking at this, it could be.'

**Sandra Smith,**North Morris Estates, Michigan

#### Water shutoffs

Some communities experienced sporadic water shutoffs lasting hours to days or weeks. The shutoffs left most residents we spoke with without consistent access to water. These residents reported experiencing stress and serious disruptions in their ability to perform daily tasks like personal hygiene, cooking and childcare. Some residents experienced challenges using medical devices that required clean and predictable water access.

We would often have the water get shut off with no notice, not a 24 hour notice, not a one hour notice... We would just get up in the morning and it would be off. So we would wind up going to the bathroom at the gas station up the street.

#### Lainey,

Lake Suzanne Mobile Home Park, Illinois

#### Vacant homes and debris

Unoccupied homes and piles of trash around communities created safety hazards and attracted pests, rodents and stray animals. Residents feared trips and falls, and some experienced injuries from falls. They also worried about the risks of infectious disease from pests and rodents, and attacks from stray animals. Additionally, the emptiness of their neighborhoods heightened residents' feelings of isolation and loneliness.

I'll be honest, the worst thing is, it's depressing... We used to have neighbors walking around, kids outside playing. Now, there's hardly anybody left... We don't even associate very much anymore, because everybody's... constantly worried. And you're always worried.

**Valeria Steele,** Elk View Estates, West Virginia

### Water and sewage infrastructure failures

Water and sewage main breaks and leaks led to standing water which damaged homes and contributed to mold growth and mosquito infestation. Residents reported frustration with the smell in and around their homes. Some residents complained of respiratory health issues and skin infections after coming into contact with the water or pesticides used to treat mosquito infestation.

My child ended up with MRSA, [methicillin-resistant Staphylococcus aureus] impetigo and some other bacterial infections... Everybody [pediatricians] just kept feeding her antibiotics and creams, trying to get it to [go away] and it wasn't. And now she has a weak immune system because of it. Every time she gets sick, it's horrible. A cold is literally like a flu to her.

#### Jenny,

River Grove Mobile Home Park, Michigan

### Broken and barricaded roads

Poor road conditions likely increased risks and injuries from trips and falls, particularly among elderly residents. Residents also worried for the safety of children on their bikes and skateboards. Residents believed that obstacles in the road, such as new homes parked on main roads, created barriers for emergency personnel.

It's very hard. I have to walk with a walker or a cane, and there's potholes all over the road. There's debris in the road. They just don't maintain nothing.

#### Ruth,

North Morris Estates, Michigan

### Overgrown trees and brush

Trees, grass, and brush growing with little maintenance have fostered mosquito infestation, allergy exacerbation, and mold growth. Some residents described overgrown trees that have punctured their roofs and even fallen through homes, contributing to mold growth and respiratory health conditions.

Every time it's raining, [my daughter's] roof in her bedroom leaks. She worries that the trees are going to come through the roof. It is a horrible existence that every time you know there's high winds or hard rain, you worry what's going to happen.

#### Kym,

Shadow Wood Mobile Home Park, West Virginia

### Neglected community amenities

Community amenities like swimming pools and clubhouses have been closed. Residents reported how these closures have limited opportunities for exercise and socializing with neighbors, which have important impacts on their wellness.

When we lost our clubhouse, we lost the pool, I think it took away us being able to get out and exercise... We haven't been connecting, really, since we quit gathering at the clubhouse, because we were getting out there and getting to know each other... I met my two friends out there.

#### Martie,

North Morris Estates, Michigan

### Additional hazardous living conditions among renters

Residents who rented their homes from Homes of America described a range of habitability issues in their homes: nonfunctional kitchen appliances, heating and air conditioning issues, leaks and mold growth, and structurally unsound walls and floors, which likely worsened food insecurity, respiratory health and mental health.

Living in a place where you are being farmed [exploited to produce profit] destroys you.

#### Lainey,

Lake Suzanne Mobile Home Park, Illinois

Homes of America residents want what we all want: safe, affordable, and stable homes where we are treated with dignity and respect. Holding Homes of America accountable to these basic healthy housing standards will require bold action to build resident power and curtail corporate greed. Policymakers at all levels of government have a critical opportunity to pass and enforce the following policies to combat unchecked corporate power and keep residents safe, healthy, and housed:

## **Policy Recommendations**

- Strengthen housing standards to keep residents safe in their homes: Pass and enforce strong housing standards like licensing requirements, regular inspections, and accountability mechanisms to ensure homes are safe and habitable
- **Protect residents from exploitation:** Pass rent regulations and good-cause eviction policies, and prohibit retaliation and unfair or discriminatory practices
- Promote and resource community-friendly ownership:
  Provide funding and pass policies that enable residents to transition from corporate to community-friendly models of ownership
- Address the root cause by limiting corporate speculation:
  Enact protective zoning regulations, impose portfolio caps, divest resources, and increase taxes on speculative investments to deter corporate profiteering

With rising costs of living and growing housing insecurity straining millions of Americans, this is the moment to treat housing as a fundamental right and building block of community health, not a commodity exploited for profit.

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Front cover: An abandoned manufactured home at Shadow Wood Mobile Home Park in West Virginia. *Photo taken January 2024.* 

Health in Partnership transforms the field of public health to center equity and builds collective power with social justice movements.

Manufactured Housing Action (MHAction empowers manufactured housing residents to build and win local, state, and national issue campaigns that protect and strengthen the long-term viability and affordability of their communities.

This report is part two of a series on Homes of America. Part one, <u>Vulture Wars: Alden Global Capital's Assault on Manufactured Housing Residents</u>, covers Homes of America's impact on financial abuses, and was published by Manufactured Housing Action and Private Equity Stakeholder Project in September 2024.

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HIP's approach to research is rooted in sharing and building power in partnership with grassroots community organizing groups. We view power-building and power-sharing as a core strategy to achieving health and racial equity, with a focus on building power in communities most harmed by structural inequities and racism. To learn more about our research approach, check out <u>HIP's Research Code of Ethics.</u>

For questions about HIP's housing justice program, contact policy@healthinpartnership.org.

### Introduction

## When housing fails, health suffers

In Florida, a manufactured home resident has been waiting several weeks for the property manager to address the mold growing in the closet, which has now spread to the ceiling. The assigned code enforcement officer cites the violation and notes, "The tenant uses oxygen tanks and is concerned the mold-like substance can affect her health further." In West Virginia, another manufactured home resident is tearfully packing up her belongings after a tree fell through her roof while she was cooking in the kitchen, nearly causing serious injury; she had been desperately trying to get the property manager to trim the tree for months. And in Michigan, a mother who rents her manufactured home is gathering her four children to sleep together in one room near their only space heater. The family is enduring another cold winter without heating because the property owner hasn't responded to her requests for maintenance.

These stories of uninhabitable housing and subsequent health risks are neither isolated nor rare. They're reflective of the experiences of manufactured housing residents nationally, whose communities have been taken over by negligent and profit-driven corporate landlords.

### What is manufactured housing?

A manufactured home, sometimes called a "mobile home" or "trailer," is a factory-built home designed to be lived in. Manufactured home communities, sometimes called "mobile home parks," are communities where multiple manufactured homes form a neighborhood. About 22 million people, or 15% of the United States population, live in a manufactured home.

Owners of manufactured home communities purchase the land where these communities are located, and homes on that land that are either owned by homeowners or rented out to tenants by the landowner. People who own manufactured homes have often invested tens of thousands of dollars in their homes, and pay a "lot fee" to the landowner to rent the land their unit sits on. Renters do not own their units and pay rent to the landowner.

Though sometimes referred to as "mobile" homes, manufactured homes are not easily moveable, and some older homes cannot move at all due to infrastructure vulnerabilities. These homes require thousands of dollars to move — which is part of why long-term community stability is important for manufactured homeowners.

Manufactured home communities are one of the last sources of affordable housing for millions of people in the US, and especially critical for immigrant families, the elderly, and people with disabilities.<sup>2</sup>

## Whether you see housing as a universal human need or the cornerstone of a community's economy, everyone needs a healthy place to call home.

Whether you see housing as a universal human need or the cornerstone of a community's economy, everyone needs a healthy place to call home. Big corporations, Wall Street investors, and the politicians they support have long treated people's homes as investments, rather than a universal need. In recent years, corporations have consolidated their power to control every aspect of housing — including its affordability, quality, and stability. Research by HIP published in June 2024, Corporate Wealth vs Community Health: How corporate landlords' profit-seeking strategies harm health, reveals that corporate landlords are increasingly buying up housing and implementing a range of strategies to cut business costs and extract profit from tenants. Corporations do this by: neglecting upkeep, filing evictions aggressively, hiking up rent and ancillary fees, evading taxes, dodging accountability, influencing policy, and undermining tenant power and democracy. These strategies impact tenants' well-being through poor mental and physical health outcomes, houselessness\*, and premature death for tenants.<sup>3</sup>

This research report focuses on one corporation's takeover of manufactured housing communities: Homes of America, LLC. Our research concludes that there is sufficient evidence to suggest that Homes of America's practices pose a serious threat to public health in the communities we examined. As a result of the company's neglect regarding habitability, residents are suffering from harmful housing and community conditions and experiencing related impacts to their health and well-being.

<sup>\*</sup>Houselessness is a term we use in lieu of homelessness to refer to people who lack stable housing. Houseless individuals, or those who are unhoused, may find homes in non-traditional spaces they create, including in the presence of friends, family, and communities.<sup>4</sup>

### Research methododology

The goals of this research are to (1) explore the state of housing habitability for a sample of Homes of America manufactured home communities, and (2) assess the health impacts of these habitability issues on residents. This report is the second in a series to document Homes of America's harms against residents. The first report, *Vulture Wars: Alden Global Capital's Assault on Manufactured Housing Residents*, was published by Private Equity Stakeholder Project (PESP) and Manufactured Housing Action (MHAction) in September 2024 and describes Homes of America's rent cost and eviction abuses against residents, including egregious increases in rental fees.<sup>5</sup>

Our research contributes to a growing body of evidence documenting how corporate landlords threaten public health and health equity. Our research approach utilizes mixed quantitative and qualitative methods to understand the housing and health experiences of residents living in Homes of America communities.



### **Data Sources:**

- US Census Bureau American Community Survey (ACS) 2022 five-year estimates and Centers for Disease Control and Prevention (CDC) PLACES 2022 data provided an understanding of sociodemographic, housing, and health characteristics of residents living in census tracts where Homes of America manufactured home communities are located
- In-depth qualitative interviews with 20 residents (including one resident who was a property manager) residing in nine Homes of America communities in: Michigan, Illinois, Virginia, West Virginia, and Florida, conducted between October and December 2024 (ee Table 1 in Appendix for sample description and sampling method description)
- Government public records between January 1, 2019 through September 2024 on housing code violation data and water quality investigations for the nine communities of focus as well as one additional community we obtained records for
- Court records and lawsuits filed against Homes of America between 2021 and 2024
- Media investigations of Homes of America communities published between 2021 and 2024
- Public health literature and scientific evidence exploring the relationship between housing habitability and health outcomes

## Public records data provide a glimpse of the actual habitability conditions that residents may face

Public records on housing habitability include housing, building, and health code violation data as well as water quality reports. Government agencies routinely collect this data to uphold standards in jurisdictions under their purview. Government agencies across cities, counties, and states vary considerably in how they collect, document, and make this data available to the public.

While tenants usually have the right to report uninhabitable conditions to government agencies, there may be obstacles in the way. Residents often do not report concerns out of fear of retaliation or eviction by their landlord. Code inspection officers may also not document violations for a variety of reasons.

The data we requested from government agencies may have gaps. For example, there is no guarantee that we received all the public records we requested. Additionally, government agencies may choose not to disclose or share some information. Therefore, this research may not provide a comprehensive picture of the full depth of housing habitability issues in the communities we studied. We primarily use public records data to supplement and confirm what we learned of residents' direct experiences during interviews.

### **Background**

## Alden Global Capital's history of profiteering and disinvestment

Homes of America, LLC is a subsidiary company of Alden Global Capital, a hedge fund founded in 2007. Investigative journalists have tracked trends in Alden's acquiring and gutting retail and newspaper companies before moving onto manufactured housing communities. Investigative reporter Julie Reynolds summarizes, "To them, a business is just a way to extract cash. There's no interest in journalism, there's no interest in providing housing — these things that are essential to our society."

# Workers' reported experiences of infrastructure issues in Alden Global Capital's commercial properties were a foreshadowing of what manufactured housing community residents would endure in coming years.

When Alden began buying out newspaper companies in 2011, the hedge fund implemented profit maximizing measures such as reducing staff, cutting news coverage, increasing subscription rates, and foregoing rent payments in commercial buildings.<sup>7,8</sup> Following Alden's takeover, media staff working in their buildings reported concerns including lack of hot water, leaking roofs and toilets, and other infrastructure issues.<sup>7</sup> Workers' reported experiences of infrastructure issues in Alden Global Capital's commercial properties were a foreshadowing of what manufactured housing community residents would endure in coming years.

Through Homes of America LLC, Alden Global Capital initiated a buying spree of manufactured housing communities in 2021. As of December 2024, Homes of America LLC owns 144 manufactured housing communities and at least 10,611 homes nationwide according to estimates by PESP and MHAction. Alden isn't alone: corporate investors accounted for 23% of all manufactured housing purchases in 2020 and 2021 nationally. Researchers and advocates suggest that real estate investors are eying manufactured housing communities as a promising source of profit, capitalizing on manufactured home residents' vulnerabilities such as challenges with moving their homes and limited options for affordable housing. 10–12

When Homes of America took over, residents across at least 20 communities faced rent hikes.<sup>5,8,13–23</sup> Residents who couldn't afford to stay were forced to leave or evicted. Simultaneously, residents in some communities reported maintenance issues and complained of their inability to reach a property manager.<sup>24</sup> Housing advocates are concerned that Homes of America is setting the standard of what housing looks like for manufactured home communities. Paul Terranova, community organizer at MHAction shared:

When you take the emerging dominant business model in the manufactured home community industry to its logical conclusion — extract more and more, invest less and less — you get something that looks like what residents are reporting in parks owned by Alden's Homes of America. This doesn't bode well for residents in any corporate-owned parks or the communities they are in.

#### Paul Terranova,

Community organizer at MHAction

## Habitable housing is housing that is safe, healthy, and fit to live in — and it's the law

Housing is essential for health.<sup>25</sup> The US Department of Health and Human Services' Office of Disease Prevention and Health Promotion summarizes that inadequate housing conditions including exposure to lead and mold, lack of air conditioning and heating, and other issues can lead to chronic diseases, injuries, mental health impacts, child behavioral and developmental issues, and respiratory health symptoms.<sup>26</sup>

Government agencies have long supported and recognized their responsibility to ensure habitable housing for communities, including through movements for sanitary and housing reforms and establishment of housing codes.<sup>27,28</sup>

The strength of habitability laws vary from state to state. Overall enforcement of these laws and application to manufactured or mobile homes also vary.<sup>29</sup> States in which we interviewed residents have legislation that pertains to ensuring habitability of manufactured or mobile home communities.<sup>30–34</sup> These laws are a helpful starting point, but could be improved to further safeguard resident health.

## The residents who call Homes of America communities home

Most Homes of America properties are located in the Midwest and southern US, particularly in Florida, where 45% of Homes of America-owned communities are based, followed by Illinois (9%), and Michigan (9%). Additional clusters of communities are located in Alabama, Georgia, Indiana, Virginia, West Virginia, and North Dakota. Nationally, manufactured home residents tend to be low-income, with a median household income of \$30,000 compared to the \$64,000 national median. Manufactured home communities are more common in rural areas, accounting for 15% of rural housing. The majority of manufactured home residents identify as White (86%), but the proportion of residents who identify as Latinx and immigrant has grown in recent years — the latest estimates from the US Census indicate that 18% of manufactured home households identify as Hispanic, and 13% identify as immigrants (including naturalized US citizens).

Figure 1: Locations of Homes of America communities



Through analysis of public datasets, we found that residents in census tracts where Homes of America properties are located generally experience greater disability, poverty, and rent cost burden compared to the national average.<sup>37</sup> Furthermore, residents in these census tracts tend to experience worse health outcomes on average — mental health, physical health, self-rated fair or poor health, high blood pressure, respiratory conditions, and depression — than national counterparts.<sup>38</sup>

Residents in the communities we examined have experienced economic and health vulnerabilities before and during Homes of America's management of the communities they live in. Through analysis of public datasets, we found that residents in census tracts where Homes of America properties are located generally experience greater disability, poverty, and rent cost burden compared to the national average.<sup>37</sup> Furthermore, residents in these census tracts tend to experience worse health outcomes on average — mental health, physical health, self-rated fair or poor health, high blood pressure, respiratory conditions, and depression — than national counterparts.<sup>38</sup> (See Table 2 in Appendix).

Most of the Homes of America community residents we interviewed are elderly, disabled, and/or retired, reflecting the sociodemographics of manufactured housing community residents generally.<sup>2,39</sup> Many residents we interviewed worked in retail, service, and healthcare industries for much of their life. Some moved to these communities because they were affordable for them or to live closer to friends and family, often/sometimes in order to receive care from an adult child or to be a caregiver for an aging parent. Others are still working in nearby service or retail businesses, for family businesses, or seeking new or odd jobs to bring in income.

## People with disabilities experience challenges finding affordable housing, making manufactured home communities a desirable housing option

In the 1970s and 1980s, disability rights activists fought to expand civil rights to people with disabilities. Their efforts led to the passage of the Americans with Disabilities Act and the inclusion of people with disabilities as a protected class covered by the Fair Housing Act.<sup>39</sup> Though this marked significant progress, these policies have not been sufficiently supported or enforced. Accessible housing and affordable housing are in short supply. Many people with disabilities still have a hard time finding employment that accommodates their needs, and disability payments can be limited. Having a low or fixed income can make it nearly impossible to find housing that allows people with disabilities to live in dignity, making manufactured housing a critical option for them.<sup>39</sup>

# For many Homes of America residents, who experience challenges such as poverty, disability, and chronic health conditions, having access to affordable and community-oriented housing is not just a preference — it is vital for their health.

Residents we interviewed represent a wide range of human experience. We spoke with caregivers and those receiving care, former foster care youth and elders who take in foster care babies, and residents living with pets, partners, family members, and young children. They enjoy crocheting, reading, writing, crafting, hosting their grandchildren, making home cooked meals, and sitting outside on their porch until it gets dark.

Multiple residents we interviewed described their communities as close-knit and supportive before Homes of America took over. Lainey, from Lake Suzanne Mobile Home Park in Illinois, shared, "He [our neighbor] would barbecue for us. We would sometimes help him with his doctor's appointments." Elderly residents recounted acts of kindness, such as neighbors offering help, while parents noted that community members looked out for their children. Among the communities we studied, many residents fondly recalled a quiet, clean, and well-maintained environment prior to the change in ownership. Sandra, from North Morris Estates, Michigan, reminisced, "We had a beautiful pond. It was gorgeous." Several residents contrasted their past sense of community with their current experiences, noting that prior management helped foster a positive atmosphere by hosting gatherings and social events.

Generally, residents chose to live in manufactured home communities for the affordability, stability, and community closeness — all of which are critical to health and well-being. For many Homes of America residents, who experience challenges such as poverty, disability, and chronic health conditions, having access to affordable and community-oriented housing is not just a preference — it is vital for their health.

## Homes of America's power over residents creates health-harming stress

All 20 residents across the nine parks we spoke with told us that Homes of America has raised rent and allowed community conditions to deteriorate. Multiple residents described the company's tactics as "manipulative" during interviews and several shared examples of conduct they believed to be manipulative:

- Disappearing rent checks and property management charging late fees despite on time payment
- Property management failing to support or provide paperwork for two residents seeking housing or public assistance
- Homes of America taking legal action against a resident who was organizing tenants and had joined a tenant lawsuit

PESP and MHAction documented accounts in which residents complained that Homes of America increased rents between 40% and 200% in some communities and introduced additional fees. During interviews, residents told us that these changes were implemented with little or no prior notice.<sup>5</sup>

PESP and MHAction documented accounts in which residents complained that Homes of America increased rents between 40% and 200% in some communities and introduced additional fees. During interviews, residents told us that these changes were implemented with little or no prior notice.<sup>5</sup> The research, along with media investigations, documented resident accounts of rent hikes in at least 20 communities nationally.<sup>5,8,13–23</sup> The research also documented eviction filings in Florida communities owned by Homes of America, with eviction rates reported to reach as high as 26%.<sup>5</sup>

Residents interviewed for this report described feeling stressed and trapped due to the housing conditions and business practices of Homes of America. Many noted that the company's control over essential aspects of their housing — such as rent, maintenance, and lease terms — has left them feeling powerless to improve their circumstances. These accounts underscore how imbalances in power between corporate landlords and residents can exacerbate housing instability, financial strain, and health challenges — highlighting the broader impacts of housing inequities on well-being.

You have no control. And so you sit there sometimes and you think, Well, how can this be legal? How can this be the way that the world works? And when you're not used to it being that way, it's really hard to process that every day ... I've seen people lose their homes. I've seen people have to move their homes and go into debt.

Valeria Steele, Elk View Estates, West Virginia

## When residents lack power to change their living conditions, their health suffers

It doesn't feel like an option [to leave]. We feel trapped, completely trapped.

#### Suzanne,

River Grove Mobile Home Park, Michigan

Homes of America has power to control residents' basic life-serving resources: housing, financial security, clean water access. This type of power is "power over" — a form of power whereby one group makes decisions impacting another group.<sup>41</sup> When residents at the whim of this type of power lack the resources to meet their needs, or change the situation, they experience stress.<sup>42-44</sup> Stress embeds in the body, causing "allostatic load" (a chronic overactivation of the body's stress response system), which leads to poor mental and physical health over time.<sup>44,45</sup>

Residents we talked to described various ways that stress materialized in their bodies or in their loved ones: vomiting, hives, migraines and headaches, trouble sleeping, lack of appetite, excessive weight gain or weight loss, skyrocketing blood pressure, depression, and anxiety.

Despite immense challenges, residents are organizing and building power to fight Homes of America's financial abuses and neglect. They're building leadership capacity with Manufactured Housing Action, contacting elected officials, and filing lawsuits to hold Homes of America accountable. They're coming together to build collective power, and advocating to support their health, their homes, their communities, and their lives.

Stress from rent hikes, eviction threats, and lack of maintenance take a toll on mental and physical health. Extensive public health research confirms the relationship between stressful housing experiences and different measures of poor health. Burdensome rent cost is associated with greater likelihood of poor self-rated health, hypertension, arthritis, cutting back on medication and healthcare, food insecurity, maternal stress, poor child behavioral health, mortality, and houselessness.<sup>46-51</sup>

One resident, Beatrice Smith, told us about having to choose between paying rent and taking care of her health:

I couldn't pay for it [rent] and eat and go to my doctor's appointments ... it was [either] pick living there and paying that [rent] and losing my health, or finding a new place to live.

#### Beatrice Smith,

Former resident of Six-O-Five Village Mobile Home Park, Virginia

Julio, another resident of Six-O-Five Village Mobile Home Park in Virginia, described the struggles he and his family endured when Homes of America increased rent to unaffordable levels.

He recounted experiences of food insecurity, difficulty paying for medications, and the emotional toll this placed on his family. Julio shared that his wife experienced health struggles during this period. Tragically, she died after suffering multiple strokes. Julio expressed his belief that the stress of the housing situation contributed to her declining health.

Nosotros ganamos el mínimo, no ganamos una gran cantidad de dinero. Algunas veces teníamos dificultad para comprar comida, porque solamente yo era el que trabajaba. Teníamos mucho estrés, y preocupados porque a veces no tenía ni para comprar la comida. A mi esposa le daba ansiedad porque no tenía mucho dinero para nosotros. Ella tenía problemas de diabetes y presión alta, y tenia que tomar medicamentos. En ocasiones no alcanzábamos a comprar todos sus medicamentos. Ella se preocupaba mucho.

I earn the minimum wage, and that is not a lot of money. There were times when I struggled to afford food for my family. I was under a lot of stress and worried that I couldn't afford to buy food. My wife got very anxious because there wasn't enough money for us. She had diabetes and high blood pressure and had to take medication. It was hard and at times we didn't have enough money to pay for her prescriptions. This worried her a lot.

#### Julio,

Six-O-Five Village Mobile Home Park, Virginia

## Stress from rent hikes, eviction threats, and lack of maintenance take a toll on mental and physical health.

Inability to pay rent is the leading cause of eviction in the US, and was the cause of eviction for all 30 eviction proceedings against Homes of America residents in North Dakota analyzed in a 2023 media investigation. <sup>52,53</sup> The threat of eviction or actual eviction is associated with a host of outcomes: houselessness, mortality, poor birth outcomes, and poor child and adolescent health. <sup>48,54–59</sup> Kym, a resident of Shadow Wood Mobile Home Park in West Virginia, described the stress her daughter experienced related to the possibility of an eviction:

My 22-year-old daughter was losing her mind. She was going to have an eviction on her record. You know, she's just starting now. She hasn't left home yet. She works full time. She goes to college full time. She's trying to prepare herself for a good life. And she was losing sleep.

#### Kym,

Shadow Wood Mobile Home Park, West Virginia

Dave, a resident of the Gardner Estates in West Virginia, recalled, "Every time rent went up, we lost more and more people." Several residents said communities that were once full and lively were now only vacant lots, resembling a "ghost town." In the next section, we describe the leading habitability issues documented in code violation reports and interviews with residents who remained in these communities, along with the health impacts they experienced.

## Findings: When housing fails, health suffers

I put a lot of time and effort into it [my home]... I feel like we always had one of the nicest looking places there... and I feel like I live in a war zone now.

#### Kym,

Shadow Wood Mobile Home Park, West Virginia

Homes of America purchased Kym's community in 2021. Like many other residents, Kym described that the transition in ownership brought negative changes to the community. Public records and resident accounts highlight habitability issues across the 10 communities for which we have data, ranging from water quality violations to infrastructure problems. After Homes of America took over, residents reported difficulties reaching staff to address maintenance concerns and frequent turnover in property managers.

[A] former property manager,
Amanda Wellbaum, who worked
at Lake Suzanne Mobile Home Park in
Illinois, told journalists, "In all my time in
property management, I've never seen a
company fail so hard for their residents."60

Some property managers have provided insight to the community conditions. Jan, a property manager we interviewed who lived at Baltimore Terrace Mobile Home Park in Michigan, believed that Homes of America delayed maintenance orders and didn't pay utility bills on time. Jan also told us that she experienced a lack of heating in the office. Another former property manager, Amanda Wellbaum, who worked at Lake Suzanne Mobile Home Park in Illinois, told journalists, "In all my time in property management, I've never seen a company fail so hard for their residents."

In this section, we explore these concerns in detail, focusing on how unsafe drinking water, inadequate maintenance, and infrastructure issues have impacted residents' health and well-being. We also examine reports from inspections and regulatory agencies, as well as the personal experiences of residents, to illustrate the pervasive challenges in these communities.

## I. Drinking water concerns in Homes of America communities present serious associated health risks

Residents and regulators have raised serious concerns about water quality issues in multiple Homes of America communities. Residents we interviewed described their belief that the drinking water is contaminated, citing unusual characteristics such as a rusty appearance, strange taste and odors resembling sulfur, rotten eggs, or sewage. Some residents reported discolored water that blocked drains and stained appliances and fixtures. Regulatory agencies have documented violations of water quality standards in several Homes of America communities:

- North Morris Estates, Michigan: The Drinking Water and Environmental Health Division of Michigan's Department of Environment, Great Lakes, and Energy wrote a letter to Bryon Fields, a Homes of America employee, and North Morris Estates Mobile Home Community citing the property for violating the Safe Drinking Water Act in January 2024. The violations included concerns about whether the water system could reliably provide enough water if one of its main wells failed ("firm well capacity"), as well as missing or outdated plans related to the water system's safety and emergency preparedness. 61,62 Between January and September 2024, the US Environmental Protection Agency noted a monitoring and reporting violation at North Morris Estates for the presence of radioactive elements, specifically combined uranium contaminants. 63
- Lake Runnymeade Mobile Home Park, Florida: The EPA designated Lake Runnymeade as an "enforcement priority" between October 2023 and June 2024. In 2023, the community was in violation of monitoring and reporting water standards related to nitrates, fecal contaminants and pollutants that are byproducts of chlorination.<sup>64</sup> The EPA also noted noncompliance with rules requiring notification to residents about water quality, which is a requirement of the Consumer Confidence Rule.<sup>65</sup>
- River Grove Mobile Home Park, Michigan: An October 2022 water sample tested positive for coliforms (bacteria) at River Grove Mobile Home Park by the Drinking Water and Environmental Health Division of Michigan's Department of Environment, Great Lakes, and Energy. 66,67
- **Six-O-Five Village, Virginia:** October 2023 water samples at Six-O-Five Village exceeded standard action levels for lead. Local regulatory agencies notified Six-O-Five Mobile Home Group LLC of an alleged violation in January 2024 for failing to notify residents about test results which is a violation of the Lead and Copper Rule. <sup>68,69</sup> EPA records documented violations related to monitoring, reporting and treatment of the Lead and Copper Rule between 2022 and 2024. EPA records also highlight violations related to monitoring and reporting of chlorination byproducts in 2022, and reporting and treatment of possible fecal contaminants in 2023 and 2024. <sup>70</sup>
- Baltimore Terrace, Michigan: In April 2022, Michigan's Department of Environment, Great Lakes, and Energy (EGLE) staff sent an email to Homes of America employees notifying them of a missed the deadline to submit plans to prevent cross contamination and back flow from non potable sources of water. In September 2024, EGLE staff notified Michigan's Licensing and Regulatory Affairs, "We would like to add Baltimore Terrace to our list of parks that we do not recommend for licensure." Staff referenced "new information about the condition and lack of compliance of their water system." During this timeframe, public records show potential elevated levels of iron in the drinking water supply. It is unclear from public records available at the time of writing whether Baltimore Terrace's license was subsequently withdrawn.



A jar of yellow-brown tap water, Baltimore Terrace, Michigan. November 2024.

## Drinking water quality may be worse than tests reveal

According to Environmental Working Group scientists, the EPA's maximum contaminant levels (or the maximum allowable concentration of contaminants) are out of date. Some of the government agency's standards haven't been updated in over 50 years, and the agency has been slow to incorporate the latest science.<sup>74</sup> This means that these standards are not sufficient to ensure drinking water quality and water quality may be worse than tests reveal.

Poor water quality can harm health via multiple pathways. Public health research confirms that disease-causing bacteria in drinking water including fecal coliform such as E. coli can cause gastrointestinal symptoms like stomach aches and diarrhea.<sup>75</sup> Residents also reported issues with hair loss, dry skin, and rashes, which they believed were related to the water quality.

I had the worst stomach ache, and I went to my doctor with the water report, and I asked him...Could this be making me sick?' And he [the doctor] said, 'Looking at this, it could be.'

**Sandra Smith,** North Morris Estates, Michigan

The health implications of excess levels of metals like iron and lead in drinking water are well documented in the health literature: neurological damage, kidney and reproductive health impacts, gastrointestinal issues. <sup>76–78</sup> High levels of nitrates impede red blood cells' ability to carry oxygen in the blood, which is harmful for pregnant people and babies. <sup>79</sup> Nitrates in drinking water are also associated with some cancers, according to health literature. <sup>80,81</sup> Furthermore, the EPA states that an excess presence of chlorination byproducts, such as the excess levels of TTHM and HAA5 found at Lake Runnymeade Mobile Home Park and Six-O-Five Village, can produce health problems impacting the liver, kidneys, and central nervous system and can increase cancer risk over time. <sup>82,83</sup> Finally, the presence of radioactive material such as uranium can create long-term cancer risks and kidney issues. <sup>84</sup>

Many residents we spoke with voiced worries about the safety of the tap water and speculated about its possible connection to health issues in their community, including cancer.

## Residents need clean and reliable water supply for medical devices to function

Danielle from Lake Suzanne Mobile Home Park in Illinois uses a kidney dialysis machine at home to carry out hemodialysis, which is a treatment that clears waste and extra fluid from her blood. She runs her machine for up to 3.5 hours every day with the support of her husband, Darren. The couple emphasized to property managers the critical importance of safe and consistent water access for her treatment: "We need to know...when you're having some kind of water issues, because I've stressed to them not knowing that contaminated water when it fills with the dialysate, yeah, it can cause death. It can be fatal."

Darren expressed frustration with what he described as inadequate support from property management to communicate with residents about water quality and access: "I can't reach out to nobody to get any kind of help." Records from local inspections confirm that the community has had at least six different property managers in the past 25 months, which Darren said he believed has made communication and resolution of issues more difficult.

All 20 residents we interviewed across nine manufactured housing communities said that in order to protect their health, they resorted to buying water bottles for drinking water, brushing their teeth, and even cooking. Gordon, who lives in Baltimore Terrace Mobile Home Park in Michigan, reported, "I buy my water. I won't drink it from here. I don't figure that rust is any good inside of me, either." Residents described this as an added financial cost burden, with some estimating they spent as much as \$60 to \$200 on water bottles a month. Residents said they also had to repair or replace appliances or fixtures that they believed the water had damaged.

## II. Water shutoffs are unpredictable and compromise residents' most basic needs

Residents we interviewed from Michigan, Illinois, and Virginia described experiencing sporadic water shutoffs without notice, ranging from for several hours to extended periods lasting days or weeks. Residents in Florida Homes of America communities also reported similar experiences with water shut offs.<sup>86</sup>

During a resident-led class action lawsuit at Massie's Mobile Home Park in Virginia, county workers testified that Massie's received numerous notices of unpaid bills and pending termination, and a worker stated that the water was shut off in November 2022 due to an outstanding balance. Residents alleged in the lawsuit that the owner "willfully" caused their water to be turned off without warning, and therefore prevented them from performing housekeeping, hygiene and childcare duties. The trial and appeals courts dismissed the lawsuit, concluding that the owner didn't "willfully" shut off the water under Virginia law. The trial court found that Massie's had "acted negligently in its failure to timely pay the utility invoices related to its recently acquired mobile home property," but that this was not enough to impose liability under the Virginia law.<sup>87</sup>

Public records indicate that River Grove Mobile Home Park in Michigan experienced a water shut off in November 2022.<sup>88</sup> An environmental health manager with the local county wrote an email to a district engineer: "What is concerning to me is that the water will be shut off until 'whenever'! I am a little lost on this one." The same community had experienced a boil water advisory for nearly two weeks that fall.<sup>88</sup> In October 2023, the Florida Department of Environmental Protection reportedly cited Homes of America with a \$3,000 citation for failing to issue residents a boil water notice after a water shutoff — potentially exposing residents to contaminated water.<sup>86</sup>

Lack of access to water in their homes created serious disruptions, residents said, and they had to plan their day around addressing their most basic needs. Lainey described at length how vulnerable and agonizing the experience was:



Lainey

We would often have the water get shut off with no notice, not a 24 hour notice, not a one hour notice ... we would just get up in the morning and it would be off. So we would wind up going to the bathroom at the gas station up the street. We would have to go to Target to buy the gallons of water so we could flush the toilet and wash our face and brush our teeth and stuff. They did that all the time. At one point, I had a [mental health] breakdown. I was like, I cannot live in a house with no water. Like, I need to be able to flush the toilet and wash my hands. And I don't think people understand what a basic need that is. Water is a basic need. Not to have it and to have to find another way to relieve yourself because you can't use your own bathroom is disgusting.

**Lainey,**Lake Suzanne Mobile Home Park, Illinois

Water shutoffs are a public health issue. When households don't have access to water, they're unable to provide care for themselves and their families. Water is necessary for basic hygiene, meal preparation, and the functioning of medical devices, like Danielle's dialysis machine described above.<sup>89</sup> A research study based in Detroit, Michigan found water insecurity to play a significant effect on residents' psychological distress, even after taking into account their socioeconomic and demographic characteristics.<sup>90</sup>

In recognition of the centrality of water to health, 34 US state governments implemented a moratorium on water shutoffs to residences to ensure widespread access to water during the first year of the Covid-19 pandemic. Communities that were protected from shutoffs saw lower Covid-19 infection rates and death rates, revealing how instrumental water access can be for controlling infectious disease and protecting community health.<sup>91</sup>

## Information about water quality or water shutoffs inaccessible to Spanish-speaking residents

Manufactured home communities are home to a growing number of immigrants and immigrant families. These residents often find that vital information about their communities, such as water quality and water access, doesn't reach them. Specifically, some manufactured housing residents, as documented in research and reported in the media, have complained that their community received inadequate notice of a boil advisory issued at the Six-O-Five Village Mobile Home Park in Mineral, Virginia.<sup>92</sup>

Julio, a resident we interviewed from Six-O-Five, described the situation to us, in his native Spanish,



Julio

En ocasiones ellos no avisan cuando van a hacer algunos trabajos. No hacen ellos algún papel para nosotros. Esa es la mala comunicación y luego que no hay una persona directamente en la oficina que esté allí. Alguna gente toma esa agua. Nosotros, mi familia, no la tomamos, nosotros la compramos. Si el agua sería de buena calidad, se ahorraría un poquito de dinero. Pero desgraciadamente no arreglan ese problema. Nosotros tendríamos que tener agua de calidad, pero no la tenemos.

They don't notify us when they do work on the water system. Communication is bad. They don't give us written notice. My family does not drink the water, we have to buy it. They don't fix the water issues, so we have bad water quality. We should have good water here.

#### Julio,

Six-O-Five Village Mobile Home Park, Virginia

Olga, who also lives at Six-O-Five Village, agreed that the communication from property management is poor and leaves them unprepared,



Olga

Si no nos avisan pues si nos agarran desprevenidos y hay veces que se tarda hasta tres días en limpiar el pozo y nos quedamos sin agua.

Because if they don't tell us [that they are shutting off the water], we are unprepared and can't get access to water, sometimes for three days or more.

Olga,
Six-O-Five Village Mobile Home Park, Virginia

Olga also said she had to rely on the local fire department to get potable water and had to use other people's homes to take showers for a week over the summer.

Julio, Olga, and many of their neighbors primarily speak Spanish, but they aren't receiving critical information about water access and quality in their language. Poor housing and health conditions can be aggravated for immigrant families because information isn't available in the language they feel most comfortable with or fluent in. Language justice means that residents have the information they need in their language of choice.

## III. Water and sewage infrastructure issues lead to home damage and health risks

Residents we spoke with in Michigan and West Virginia believed that Homes of America's lack of maintenance and investment in communities' water and sewage infrastructure resulted in breaks and leaks. These events led to standing water that compromised the integrity of the community, homes, and residents' health and safety.

Michigan's Department of Environment, Great Lakes & Energy (EGLE) visited River Grove Mobile Home Park and communicated with a Homes of America employee and River Grove MHP LLC to address water infrastructure problems at least twice in 2022. 93,94 The Department followed up on and validated residents' concerns regarding main and multiple service line leaks, broken water mains, flooding, and sewage discharge. 93,94 EGLE also notified Homes of America of a violation in which water from the community was directly spilling into the nearby St. Joseph River, creating potential environmental impacts, depending on the quality of the water discharged. 95 Standing water was a recurring and unaddressed issue between 2022 and 2024 at River Grove Mobile Home Park according to annual inspection records.

The Mercer County Health Department in West Virginia found uncapped water and sewage on empty lots and "excess standing water [under homes] in Shadow Wood Mobile Home Park due to insufficient drainage" in 2022.96 Public records of inspections at nearby Elk View Estates also revealed sewage leaks and wet ground conditions on some lots in 2022 and 2023.97 Additionally, the County identified excess standing water and poor drainage in Gardner Estates in between 2022 and 2023.98 The State's Department of Environmental Protection conducted a site visit and confirmed that there "was evidence of a sewage spill on the ground" and the park operated a disposal system without permit in September 2023 after receiving complaints from residents.98 A resident told us that just a few months prior, in July 2023, a temporary sewage system at Gardner Estates stopped working, caught fire, and exploded.



Flooded road at Baltimore Terrace, Michigan, July 2023.



Flooded lots and paths at Shadow Wood Mobile Home Park, West Virginia, January 2025.

## West Virginia communities file class action lawsuits against Homes of America

Mountain State Justice, a legal advocacy firm, represented residents in five West Virginia communities (including three that we examined for this report: Shadow Wood Mobile Home Park, Gardner Estates, and Elk View Estates) in a class action lawsuit, filed in February 2023. The lawsuit referenced habitability issues including standing water, sewage problems, and debris. Mass eviction of tenants and rental lease agreements were also described in the filing. 99-101 A filing for the lawsuit described the alleged habitability issues in this way:

The infrastructures in the communities at issue suffer from long term underinvestment and management indifference, resulting in significant health, maintenance, and safety issues adversely affecting the tenants' quality of life, such as faulty sewer systems and standing water.

These conditions have resulted in unsanitary living conditions, insect infestations, property damage to tenants' homes, and in some cases, the inability to relocate the homes because of the saturated land upon which the homes sit.<sup>102</sup>

The lawsuit states that Defendants (Homes of America, the five communities, and Smith Management LLC (the parent company of Homes of America) have "failed and continue to fail to satisfy the common law and/or statutory warranty of habitability" and "the conditions in the community fail to meet the requirements for health and safety as contained in the Bureau for Public Health's legislative rule." Legal experts and residents relied on personal accounts and inspection data from the Mercer County Health Department to describe the habitability issues they experienced. Homes of America and West Virginia residents came to a settlement for the lawsuit in 2024, with court approval expected in 2025. 103 As part of the settlement, Homes of America denied any wrongdoing, but agreed to comply with all applicable West Virginia laws and regulations, including habitability laws. Homes of America also agreed to:

- Provide lease agreements to those residents who remained in the lawsuit with a comparable lease as provided to others, including the opportunity for lower rent and credit for overcharges
- Improve processes for rent payment, including refunds for inadvertent late fees
- Allow (and not further hinder) residents' efforts to organize with one another or seek outside assistance

In a separate settlement, Homes of America agreed to withdraw a lawsuit against resident and community organizer Valeria Steele for organizing and educating residents about rental lease agreements.



Valeria Steele

My biggest takeaway is that it took a lot of interaction amongst the communities to be resilient to last through this. It proves that if you organize, it does make a difference. If we hadn't shared information about what was going on, if people hadn't gotten together, it [the lawsuit] wouldn't have gotten off... Don't be afraid to act. It's your right.

**Valeria Steele,** Elk View Estates, West Virginia

Fifteen residents of Six-O-Five Village Mobile Home Park in Virginia filed lawsuits against Six-O-Five Mobile Home Park and Homes of America, specifically for violating the Virginia Manufactured Home Lot Rental Act and Virginia Consumer Protections Act for: instituting a rent increase in the middle of the lease term, failing to provide adequate notice for rent increases, as well as illegal late fees and subsequent harm (such as stress, anxiety, and worries about payment and possible eviction).<sup>104</sup> According to a resident we interviewed, Homes of America eventually settled with them, paying them back for the excess fees they had imposed.

Residents in Michigan and West Virginia reported that starting in 2022, standing water would remain in their yard for days after heavy rainfall and snowfall, under their porch, and in the underpinnings of their homes where mosquitos, algae, mold and fungus thrive. These residents believed that the standing water caused their homes' floors and walls to weaken and deteriorate, and the framing to shift. Kym, a resident of Shadow Wood Mobile Home Park in West Virginia, described seeing "toilet paper and feces rolling under the house" during sewage line breaks.

Residents expressed to us that when sewage line breaks occurred, they could no longer spend time outside, sitting on their porch as they had once enjoyed, due to the smell of the sewage. Jenny described the health consequences her daughter experienced after playing in the yard, which was drenched with sewage water:

My child ended up with MRSA, [methicillin-resistant Staphylococcus aureus] impetigo and some other bacterial infections... Everybody [pediatricians] just kept feeding her antibiotics and creams, trying to get it to [go away] and it wasn't. And now she has a weak immune system because of it. Every time she gets sick, it's horrible. A cold is literally like a flu to her.

**Jenny,** *River Grove Mobile Home Park, Michigan* 

Diane, who used to live at Baltimore Terrace Mobile Home Park in Michigan, experienced a serious reaction that she believed was to the pesticide that the property manager sprayed to address the mosquito infestation from standing water:



Diane Hull

Lo and behold, I ended up at the hospital and the doctors and the cardiologist, because it caused an irregular heartbeat, they had to monitor [me] for a week, and then finally, had to put me on medication to the heart specialist because it messed up my heart, and the asthma attack caused breathing issues. So then I had to go see an asthma specialist, which then they gave me medication for that. Not counting my asthma medicine I already had.

### **Diane Hull,**Baltimore Terrace Mobile Home Park, Michigan

## IV. Vacant homes and debris threaten residents' sense of safety and community

The residents we interviewed described their communities' emptiness and disrepair as a top concern. At the time of the interviews, remaining residents described living alongside dozens of abandoned homes after the exodus of neighbors due to rent hikes and eviction orders. As of December 2024, residents across the nine communities reported that these units weren't being fixed or removed by Homes of America. At the time of the interviews, residents told us that piles of trash had been laying around for months, which they believed invited roaches, rodents, feral cats and dogs, and wildlife into the community. Residents also said they encountered strangers wandering into vacant units and even occupied units; they believe that their sense of safety was threatened.

Code inspectors have condemned vacant units and issued violations to Homes of America in five communities:

- Lake Suzanne Mobile Home Park, Illinois: According to September 2023 inspection records for Lake Suzanne Mobile Home Park in Illinois, code enforcement officers identified over 20 vacant structures "unfit for habitation," and to be condemned.<sup>105</sup>
- North Morris Estates, Michigan: In March 2023, code enforcement personnel inspecting North Morris Estates in Michigan identified 25 lots that required demolition and over 20 that had specific issues, including with the skirting, porches, roofs, and windows. 106 The legal counsel for Thetford Township, where the community is based, sent a letter to North Morris Estates in May 2024 requesting to meet in person to discuss and resolve outstanding issues, indicating "the issues and concerns are too many and too large for emails." 107
- Lake Runnymeade Mobile Home Park, Florida: In August 2024, a routine inspection of Lake Runnymeade Mobile Home Park in Florida documented a violation of "Garbage and Refuse Disposal," indicating that the property owner failed to dispose of garbage and solid waste. Reinspections on September 13 and October 11, 2024 revealed that the violation had not been addressed. The issue was finally resolved during a third reinspection on October 22, 2024.<sup>108</sup>
- Elk View Estates, West Virginia: In 2022 and 2023, Mercer County Health Department inspection records of Elk View Estates in West Virginia found vacant mobile homes, including "tires and concrete block strewed about the road," as well as "lots with litter, debris and clutter." 97
- **Gardner Estates, West Virginia:** In October 2022, the Mercer County Health Department also cited nearby Gardner Estates with a note that "several homes and vacant lots have trash strewn about." 98

Vacant and unkept units and lots create opportunities for hazards. Ruth described an injury that resulted from walking on what initially appeared to be grass on an empty lot:

I walked across an empty lot, [where it looked like] it was just grass. It was a board underneath the grass. The board broke, and my leg went right down into a pit... I had drain tile that was stuck in my leg that I picked out for three weeks... And it was all bruised up and everything.

#### Ruth,

North Morris Estates, Michigan

Residents believe that vacant units are housing stray animals and wildlife, and they worry about these animals attacking their young children and pets. Stray animals and their urine and feces can carry transmittable diseases. including rabies, toxoplasmosis, and leptospirosis. <sup>109</sup> Furthermore, residents from multiple communities described how they found drug paraphernalia in vacant manufactured home units and buildings, which may create health risks for anyone coming into contact with used or broken needles. <sup>110,111</sup>

Finally, the emptiness of the community is a constant reminder to residents of how dramatically their neighborhood has changed. Residents we interviewed described how the community is now "empty and dreadful" and doesn't feel like a community anymore. Residents have lost their friendships and some now keep to themselves. Valeria described the resulting social disconnection:

I'll be honest, the worst thing is, it's depressing... We used to have neighbors walking around, kids outside playing. Now, there's hardly anybody left ... we don't even associate very much anymore, because everybody's ... constantly worried. And you're always worried.

#### Valeria Steele,

Elk View Estates, West Virginia

In 2023, the US Surgeon General called attention to loneliness and isolation as a public health crisis negatively affecting mental and physical health, including increased risk of heart disease, stroke, dementia and premature death.<sup>112</sup> Elderly people and people with disabilities, who are disproportionately represented among manufactured home communities, are at greater risk of loneliness and isolation.<sup>113,114</sup>

## V. Broken and barricaded roads create safety hazards and injury risks

Residents described the roads in their communities as crumbling with potholes, in desperate need of repair. Photos from residents and code enforcement document roads obstructed with trailers and debris. Some residents believed that road conditions prevented them from getting around safely — especially for residents with disabilities who required a walker, cane, or wheelchair to be mobile. Neighbors worried for their safety and that of others:

It's very hard. I have to walk with a walker or a cane, and there's potholes all over the road. There's debris in the road. They just don't maintain nothing. They have taken trailers and blocked my road. I even had to call the fire marshal over it, because they blocked my road completely. Where, if something happened, where my house caught on fire, or something happened to me medically, or anything like that, nobody could have gotten through.

### **Ruth,**North Morris Estates, Michigan



New manufactured home units sitting in and blocking part of roadway at North Morris Estates, Michigan, January 2024.

In River Grove Mobile Home Park in Michigan, code enforcement identified pot holes in roadways in front of 14 lots around September 2023. 115 In nearby North Morris Estates, the local township supervisor expressed concern over hazards impeding the roads in February 2024: "The Chief of Fire contacted me last week and said that they do have mobile homes in the road and emergency services cannot get through." 116

Residents believed that road conditions created risk for falls. Falls are especially concerning for older adults who can suffer serious injuries like broken bones, long-term disability, and even death.<sup>117</sup> Falls are the leading cause of injury-related death for older adults in the US.<sup>118</sup> Driving on or over potholes and broken roads can damage cars, require costly repairs, and cause accidents with harm to drivers and others.<sup>119</sup>

Residents were especially worried about the well-being of children riding their bikes and skateboards. Diane, who lived at Baltimore Terrace Mobile Home Park in Michigan, explains, The kids ride their bikes and their skateboards and they have to dodge the holes. If they don't dodge them just right, they end up breaking an arm and a leg.

Residents were also concerned about lack of adequate lighting in their community at night, especially for their neighbors and loved ones who have vision disabilities and fear tripping and falling.

## The climate crisis will exacerbate community-level infrastructure hazards

With climate change, extreme weather events are increasing in intensity.<sup>120</sup> In Florida, tropical rain storms are getting stronger, creating flooding risks.<sup>121</sup> Michigan and Illinois are also expected to experience heavier rainstorms, as well as warming temperatures causing snowmelt and flooding.<sup>122,123</sup> Homes of America properties in these states are already experiencing water, sewage, and drainage issues, which may worsen over time without adequate infrastructure investments.

When we asked residents about how Homes of America is preparing the communities for climate disasters, they simply repeated that the company barely addresses the existing issues in the communities the company owns.

# VI. Overgrown brush, trees, and ponds increase allergies and mosquito infestation

Michigan and West Virginia residents reported that trees, grass, and brush have grown with little maintenance from Homes of America property management. One resident in West Virginia described how "weeds have become trees." Multiple residents in both states told us during interviews conducted in October and November 2024 that trees were blocking street corners, inhibiting visibility, and growing over homes. Some residents had taken initiative to address the tree growth by cutting tree branches as best as they could, despite physical disabilities or financial strain, citing a lack of action from property management.

Kym owns her home at Shadow Wood Mobile Home Park in West Virginia. She told us about an overgrown tree that punctured the roof after she replaced it. "The tree that is over top of our home has already punctured holes through the new roof, and our roof leaks when it rains," she said. "I have photos of black mold in my ceilings." Kym described her daughter's fear of the tree crashing through the home:

Every time it's raining, her roof in her bedroom leaks. She [Kym's daughter] worries that the trees are going to come through the roof. It is a horrible existence that every time you know there's high winds or hard rain, you worry what's going to happen.

### Kym,

Shadow Wood Mobile Home Park, West Virginia

Kym, her daughter, and her husband are on multiple anxiety medications, as well as allergy medications due to the mold. In 2025, months after Kym shared these issues with us, we learned that the tree had fallen through Kym's home, blocking her in and permanently destroying the home. Relatedly, a Florida resident at Lake Bradford Estates experienced a large tree branch falling through his roof, according to a July 2023 news report — neighbors referenced property management's unresponsiveness to maintenance requests. 125



Black substance on the ceiling, photo shared by Kym and taken inside her mobile home unit at Shadow Wood Mobile Home Park in West Virginia, November 2024.



Tree growing over manufactured home unit. Photo shared by Kym and taken outside her manufactured home at Shadow Wood Mobile Home Park in West Virginia, January 2025.

Some residents reported that grass had grown uncontrollably despite community landscaping being a responsibility of property management. These residents believed that tall grasses are attracting mosquitos, fleas, roaches, and wildlife, as are unmaintained ponds and creek beds. Some residents blamed the mosquito problem for preventing them from gathering or sitting outdoors in the evening. Sandra, a Michigan resident, told us that she believed her allergies have worsened over time due to the tall grass:

They [property management] took our maintenance away. They have not mowed in months. I have bad allergies. Our grass is up to our knees. They got dirt piles all over...I'm on two inhalers all year long now, and an allergy pill... I was only on one [pill] when the grass was down.

**Sandra Smith,** North Morris Estates, Michigan In Elk View Estates, West Virginia code enforcement recorded a violation for "high grass on vacant lots" in July 2023. 97 Longtime resident Valeria described the the conditions in her community:

The creek doesn't drain effectively. And [we have] huge problems with bugs, because the high grass holds the water ... you get an increased amount of bugs. And mosquitoes in particular.

**Valeria Steele,** Elk View Estates, West Virginia

Mosquitos require standing water to complete their life cycle.<sup>126</sup> The Office of Epidemiology & Prevention Services in West Virginia reports that the most commonly reported mosquito-borne illness in the state is La Crosse encephalitis, which typically affects children.<sup>127,128</sup> West Nile virus is also a serious concern, with the elderly being more susceptible to infection and long-term health effects.<sup>129,130</sup>

# VII. Neglected community amenities prevent residents from exercising and socializing

Residents told us that community amenities at Homes of America parks that once facilitated community connection are now unavailable. Residents at Lake Runnymeade Mobile Home Park in Florida and North Morris Estates in Michigan described in October 2024 that the community swimming pool hasn't been maintained in years. Additional community amenities, like clubhouses or playgrounds, also are no longer available. An April 2023 media investigation of residents' experiences at Lake Bradford Estates in Florida included an interview with a resident who said the community's gym, sauna, pool, playground, and basketball court were no longer available for use.<sup>20</sup>

At Lake Runnymeade Mobile Home Park, county code enforcement emailed Homes of America staff about the conditions of community amenities in January 2022: "There is a blue building in the back that appears to be a maintenance building for the park and it is severely unmaintained. ... [t]he bathrooms near the pool are also severely unmaintained. "131 An interview with a resident of Lake Runnymeade Mobile Home Park, as well as media investigations, report that community amenities are still unavailable years after Homes of America took over. 13,132







Google Earth aerial images of the community swimming pool at Lake Runnymeade Mobile Home Park in Florida, dated January 2021, March 2022, and May 2023. The color of the water in the pool is seen to be blue in the first image, and then murky green in the two later images. Homes of America purchased Lake Runnymeade Mobile Home Park in 2021.

# Charlene needs to relieve her back pain, but the community swimming pool has been unmaintained and closed for years

Charlene has lived at Lake Runnymeade Mobile Home Park in Florida for over 10 years. She explained to us that she experiences disabling chronic health conditions, including arthritis, high blood pressure, and back pain. She told us she believes that Home of America hasn't adequately tended to the pool since the company took over. Charlene used the pool under prior ownership regularly to alleviate her health symptoms:

I would get in the pool and exercise my legs and my back, because I messed up my back. I'm a high risk, so they can't do surgery on me, and I get sharp pains running through my leg and my back, and they tell me to exercise in the pool. I can't do it because the pool is not fixed yet.

### Charlene,

Lake Runnymeade Mobile Home Park, Florida

A media investigation reports that dozens of Lake Runnymeade Mobile Home Park residents have contacted their local representatives to complain about their experiences with deteriorating community conditions and rising rent. Republican State Representative Paula Stark expressed her concern for the residents to reporters: "These big companies are buying mobile home parks across the country and all they see is a return on the dollar but they're not taking care of the residents." 13,86

Martie, a resident who lives at North Morris Estates in Michigan, described how important community amenities were for not only health, but also relationship-building:

When we lost our clubhouse, we lost the pool, I think it took away us being able to get out and exercise. ... We haven't been connecting, really, since we quit gathering at the clubhouse, because we were getting out there and getting to know each other... I met my two friends out there.

### Martie,

North Morris Estates, Michigan

Research shows that a negative sense of community is associated with stress, depression and anxiety. A loss in amenities designed for socializing and gathering can aggravate the loss of community connection. According to research, amenity-rich neighborhoods improve health outcomes, regardless of economic standing. Research from the American Enterprise Institute Survey on Community and Society found that community amenities create opportunities for neighbors to socialize, build trust, and combat loneliness. Neighbors are also more likely to offer support to one another, which could be especially important for elderly residents who live alone, face unmet care needs, and/or experience challenges with daily tasks — including dealing with potential habitability issues.

# VIII. Renters experience additional housing and health harms

Manufactured home communities are often home to both homeowners, who own their manufactured home and pay a lot rent, and renters, who rent manufactured homes that the landowner owns and maintains. We interviewed five current or former tenants of Homes of America-owned homes. All renters we interviewed reported the community-level habitability issues described above and shared accounts of additional habitability issues within their homes. Residents believed that property management made false promises about the rental units' amenities and rented out units that were in disrepair. All of these residents reported that their maintenance requests were ignored, denied, or delayed.

Code inspection records pertaining to Homes of America's Lake Bradford Estates in Florida in 2022 and 2023 recorded violations for electrical wiring, sewage backup, leaks, and infrastructure issues in at least three units.<sup>139-141</sup> At least one renter initially complained of these issues in December 2022. According to email exchanges between Homes of America staff dated April and May 2023, most of the issues (i.e. missing socket covers, weather stripping, ceiling leak, damaged doors) relating to one unit weren't resolved until May 2023.<sup>141</sup> A Homes of America employee summarized in an April 2023 email: "A tenant called his office claiming the deficiencies (from the checklist) need to be fixed. So, I guess they sent out an inspector back in December [2022] and nothing has been fixed since."<sup>141</sup>

At Lake Suzanne Mobile Home Park in Illinois, nearly 40 out of about 100 homes reportedly failed inspection in May 2023, according to public records data. These homes included both vacant (unoccupied) and owner-occupied units accompanied by a long list of recorded violations. About a year later, inspectors marked 17 lots for failed inspection. According to a media investigation, some Illinois residents, including at least one from Lake Suzanne Mobile Home Park, have filed a total of five lawsuits against Homes of America for habitability issues for reasons such as water leaks, nonfunctioning air conditioning, wheelchair inaccessibility, and failure to respond to repairs in a reasonable amount of time. In one case, a tenant took Homes of America to small claims court to seek reimbursement for the cost of fixing his flooring, which he alleged had been rotting and growing mold due to a roof leak. The tenant described the room where the mold was growing as a "health hazard" and "uninhabitable." The tenant shared that Homes of America eventually subtracted the cost of the repair from the rent. 60,146,147

### Jenny's housing struggles at River Grove Mobile Home Park

Jenny and her four young children have lived in a rented manufactured home in River Grove Mobile Home Park, Michigan, for over five years. She said that since Homes of America took over management, her family has faced ongoing housing instability and unsafe living conditions.

So they [property management] just literally just threw some paint over mold... they put in a nasty orange bathtub and spray painted it white ... my babies, I tried to give them a bath, and it was literally white water, like, from the paint. They literally couldn't even still take a bath.

### Jenny,

River Grove Mobile Home Park, Michigan

Jenny said her family has been forced to move repeatedly within the park due to unaddressed maintenance issues: "We have to keep moving from trailer to trailer to trailer because they [Homes of America] don't want to fix nothing."

Jenny described an incident where her daughter tripped and fell through the hole in the living room floor. During winter, the family shares a bedroom because the heating system has not worked for a year and a half. She also said she believes her family is experiencing prolonged illnesses due to mold exposure.

Housing habitability issues are associated with negative health outcomes according to public health literature. 148,149 Because children are still developing, they can bear the highest burden of poor housing and subsequent health impacts — for example, through lead exposure and respiratory illnesses. 150,151

All Homes of America renters we interviewed described experiencing structural issues with their homes, which included: broken decks, loose windows where rainwater enters, insufficient insulation, loose cabinets, crumbling walls, and walls separating from floors. Some residents reported holes in their flooring and roofs, and some were fearful of the roof collapsing on them while they showered or slept. Leaks beginning in bedrooms and bathrooms spread across other rooms in their homes and weakened infrastructure to the point that the floors rotted.

Residents who experienced leaks believed that the mold growing in their homes was attributable to the water leaks. One resident described that mold had spread through books and clothes, which they then had to discard. Mold had also spread across ceilings and around the ventilation, which blew mold into the air. Researchers have found that exposure to mold is associated with respiratory conditions and symptoms like asthma, cough, wheezing, and sinus congestion. Danielle described how, after receiving quality care while hospitalized, she felt her health declined after returning home. She questioned whether potential presence of mold in her home was contributing to her symptoms:

When I came back home, I started feeling bad again, almost like, there is something in this house making my allergies rack up and I know it's because of the roof ... both my daughter and I have really bad sinuses... I'm sneezing a lot more, and I could just tell my sinuses are bad. Is there water leaking in? Is there mold?

### Danielle,

Lake Suzanne Mobile Home Park, Illinois

Some residents reported issues with their heating and air conditioning systems. Researchers have documented the health effects of low and high indoor temperatures, which can increase the risk for respiratory conditions, high blood pressure, cognitive difficulty, and infections.<sup>153,154</sup>

A literature review of 22 research studies found that "symptoms of mental health disorders are exacerbated by high indoor temperatures," which aligns with what Lainey described experiencing<sup>154</sup>:



Indoor temperature recording 90 degrees Fahrenheit in a tenant-occupied manufactured home, Lake Suzanne Mobile Home Park, Illinois, June 2023.

I at one point had several breakdowns, because heat is very bad for your mental health, and I suffer from anxiety and depression, and so it was just exacerbating it. So imagine living in a metal box, and during a summer where it's 104, 105 [degrees] outside, you have no relief.

### Lainey, Lake Suzanne Mobile Home Park, Illinois

Some renters reported not having access to basic appliances in their rental units, which prevented them from cooking meals. For residents with chronic health conditions requiring special diets, not having functioning appliances limited their ability to consume food that was essential and healthy for them. For example, residents described eating microwavable meals because they didn't have a functioning oven or stove top. Research studies indicate that a lack of available food preparation equipment limits one's ability to prepare healthy meals and can exacerbate food insecurity.<sup>155,156</sup>

# Conclusion and policy recommendations

# Residents want their homes and communities to be safe, affordable, and stable

The Homes of America residents we spoke with want what we all want: safe, affordable, stable homes. They want places to build their futures, put down roots for their children, enjoy their hobbies through their retirement, and spend time with their loved ones and neighbors. Most of all, residents want dignity, respect, and a sense of control over their living spaces. Their experience living in Homes of America properties has been the opposite of this. Residents told us they believe that Homes of America has treated them as beneath concern because they are working class or live in manufactured homes.

Homes of America can begin to treat residents with dignity and respect by ensuring that communities and homes are habitable: water is safe to drink, sewage systems work, roads are maintained, vegetation and vacant homes are cleared, community amenities are available, and renters have safe, functional, clean homes. Residents also demand fair rents and lease terms, transparent and honest property management staff, and the right to raise their complaints without the threat of harassment and retaliation. PESP and MHAction describe a comprehensive list of residents' demands in their report, <u>VULTURE WARS: Alden Global Capital's Assault on Manufactured Housing Residents</u>. <sup>5(pp18-19)</sup>

Most of all, residents want dignity, respect, and a sense of control over their living spaces. Their experience living in Homes of America properties has been the opposite of this.

# Local, state, and federal governments have an obligation to stand with residents

Local, state, and federal governments have an obligation to ensure that all residents — no matter who they are, or where they live — have access to homes that are habitable.

The sheer power held by corporate landlords like Homes of America makes it extremely difficult for government agencies to hold them accountable.<sup>3</sup> Mitigating the power of Homes of America and other corporate landlords will require significant intervention from all levels of government, which must pass policies and ensure their implementation and enforcement. Many of the harmful practices residents and code enforcement data describe violate existing standards. Government agencies need a variety of tools, including housing codes, resident protection policies, tax codes, and budgets, as well as political will from decision-makers, to enforce housing standards.

Ultimately, keeping residents safe in their homes requires shifting the vast power imbalances in wealth and influence that exist between landlords and residents, so that manufactured housing residents and others impacted by housing instability have the power needed to improve living conditions and lead toward a future of housing and health for all.<sup>3,27,28</sup>

Ultimately, keeping residents safe in their homes requires shifting the vast power imbalances in wealth and influence that exist between landlords and residents, so that manufactured housing residents and others impacted by housing instability have the power needed to improve living conditions and lead toward a future of housing and health for all.<sup>3,27,28</sup> All of these recommendations are most successful when they happen in coordination with mass grassroots organizing that grows residents' power and dedicated funding, resources, and staffing to sustain it.

# Recommendations to improve health in Homes of America-owned parks

Local, state, and federal governments should take four critical actions to protect residents. We based these recommendations on interviews with resident leaders, organizers, and advocates; PESP, MHAction, and HIP's previous research reports; and best practices in the field. While the main focus of the recommendations is improving habitability, we also include tools to protect residents from rent and fee-gouging, eviction, and other forms of exploitation, all of which have negative health impacts. And we suggest policies to change conditions at their root by preventing speculation (investments based on an expectation of rapid increases in value) and charting a path to community-friendly ownership models that are safe and permanently affordable.

We indicate whether federal, state, or local governments, or non-governmental actors should prioritize and pursue each recommendation with  $\hat{\underline{m}}$   $\hat{\underline{m}}$   $\hat{\underline{v}}$  symbols. Local governments' authority over housing and land use makes them the first line of defense for residents. Therefore local elected officials, as well as agency executives like public health and code enforcement administrators, need to bring strong leadership to this issue. **State governments** can pass protections and secure resources for community control of parks, and their attorneys general and environmental, public health, and licensing agencies can set and enforce standards. And ultimately, **the federal government** has the power and resources to rein in corporate owners and provide community-controlled housing at scale. Many policies can be pursued by several or all of these actors.



### Four critical areas of action

Federal, state, local, and non-governmental actions at a glance

With recommended scale of action











scale of action	Needed	State Action Needed	Local Action Needed	Non-Governmental Action Needed					
1) Strengthen housing stadards to keep residents safe in their homes									
Enable strong enforcement of existing standards	<b>/</b>	<b>√</b>	<b>/</b>						
Pursue effective inspection and enforcement		<b>/</b>	<b></b>						
Enforce standards through licensing		<u> </u>	<b>√</b>						
Ensure a strong warranty of habitability		<u> </u>							
2) Protect residents from exploitation									
Regulate rent increases	<b>/</b>	<b>√</b>	<b>/</b>						
Pass "good cause" for eviction and lease non-renewals		<u> </u>	<b>✓</b>						
Protect residents from retaliation, harassment, and discrimination		<b></b>	<b></b>						
Require fair leases and community rules		<b></b>	<b>/</b>						
3) Promote and resource community-friendly ownership									
Resource community-friendly ownership	<b>/</b>	<b></b>	<b>/</b>						
Enable community purchases		<b>√</b>	<b>/</b>						
4) Address the root cause by limiting co	orporate speculation	on							
<u>Limit portfolio size</u>	<b>/</b>	<b></b>	<b>/</b>						
Withdraw taxpayer support for bad actors	<b></b>								
Use zoning to allow and preserve manufactured home parks			<b>/</b>						
Divest pensions from bad actors									

### 1) Strengthen housing standards to keep residents safe in their homes

Pass and enforce strong housing standards like licensing requirements, regular inspections, and accountability mechanisms to ensure homes are safe and habitable.

### 



Decisionmakers should ensure that policies have the teeth they need to be effective with large corporations. Agencies need strong policies, resources, enough staff, and political will to successfully enforce standards, and both park owners and residents need to be educated about their rights and responsibilities. Fees and fines need to be high enough to compel action, jurisdictions should condition licenses on meeting standards, and residents should be empowered to enforce their own rights. 158,159

- Enforcement depends on accurate ownership data, which can be difficult with corporations who often hide behind multiple shell LLC companies. Governments should pass transparency policies like a proposed national residential rental registry, California's proposed LLC transparency standards, and Colorado's Mobile Home Park Act, which creates a registry of parks in the state. 160-162
- Colorado's Mobile Homes Park Act charges the state public health department with testing water quality in all parks, establishes an enforcement program to track and resolve violations, and is coupled with resident education led by community organizations. 162
- Both Colorado's law and Virginia's Manufactured Home Lot Rental Act authorize local jurisdictions to pass their own enforcement policies, and Virginia also allows local jurisdictions to sue park owners on behalf of residents. 163 Cities like Brooklyn Center, MN and Austin, TX have created programs that impose additional licensing requirements or penalties for landlords that fail to maintain units. 158,164
- Decision-makers should also ensure that residents can enforce their own rights, by establishing a right to legal counsel for those facing displacement or uninhabitable conditions; by enabling them to withhold rent as proposed under Illinois' People Lift the Ban Act or Los Angeles' REAP program; and like Colorado, by providing a private right of legal action with damages and attorney's fees so that residents can sue and find attorneys to take their case when their rights are violated. 165-168

### 



Health and housing code enforcement needs to be designed to be effective with large corporations like Homes of America while ensuring that both renters and homeowners have the support they need to make homes healthy without being displaced. To be effective and fair, enforcement programs must be:

- Resourced and staffed to get the job done, including the frequent reinspections needed with non-compliant park owners
- Conducted proactively (not just based on complaints) so that homes and communities are regularly inspected and residents don't face retaliation for reporting concerns
- Designed to ensure stability so that residents are not displaced or that they receive relocation assistance when rental homes need substantial repairs or are declared unfit for human habitability
- Community-based, meaning that organizers accompany inspectors to
- support residents and make them aware of their rights, and residents have anonymous and/or culturally appropriate ways of making complaints
- Comprehensive, to protect people from health hazards like lead and mold that are not always included in housing codes
- Enforceable, so that inspectors can hold negligent park owners accountable while pursuing "cooperative compliance" with low-income homeowners to educate them about possible solutions and connect them with resources like grants or low-interest loans<sup>169</sup>

For more on inspection and enforcement, see HIP's <u>Action Agenda for</u> Healthy and Dignified Housing. 170(p19)

### ullet Enforce standards through licensing $\bullet$ $\bullet$



Local or state governments can require park owners to meet standards before receiving or renewing a license to operate and can revoke licenses or impose more rigorous licensing requirements on owners that don't meet standards. Licensing can help enforce standards like habitability and resident protection laws or payment of unpaid fines. 158,171

- In Michigan, some Homes of America parks have been cited, and one faces criminal charges, for operating without licenses, and bills proposed in 2024 would have made it illegal for unlicensed parks to collect rents or evict, and would have blocked licenses for owners with histories of unfair practices and rent increases.<sup>61,72,172</sup>
- Floyd County, Virginia requires new parks to demonstrate they are following detailed design and habitability standards before beginning or expanding operations. 173

### Ensure a strong warranty of habitability



A warranty of habitability cre-ates an implied agreement that landlords must provide safe and livable homes. This allows residents to push park owners to make repairs and can also be used to defend against eviction if landlords have not fulfilled their responsibility to provide a habitable home. It's important to note that judges often need to be educated to understand this right before residents can successfully use it as a defense.

 New York's RPP § 235-B establishes this right for rented, leased, and rent-to-own homes as well as common areas in a community. 174

### 2) Protect residents from exploitation

Pass rent regulations, "good cause" eviction policies, and prohibit retaliation and unfair or discriminatory practices so that residents have a safe, affordable, stable place to call home and can advocate for improved conditions.

### Regulate rent increases 🚊 🚾 🧕



Rent caps, rent control, or rent stabilization policies limit how much a park owner can increase rents/lot rents a year, often tying increases to a set percentage, local cost of living increases, or justifiable capital improvements.

- Humboldt County, a rural county in California, matches rent increases to the cost of living and requires a vote from residents for capital improvement costs.<sup>175</sup> Laws may also prohibit charging a markup on utilities or limit fees or penalties to only those associated with the cost of occupancy or necessary to ensure health and safety.
- Some jurisdictions, like Berkeley CA, New York City, Seattle WA, and the District of Columbia have included provisions in their rental regulations that prohibit rental increases for units with active habitability violations, which can provide a substantial incentive to comply with habitability standards. 176-179
- Where rent stabilization is not politically viable, jurisdictions have passed more limited rent justification policies, which prohibit rent increases beyond cost of living adjustments unless they are justified by park improvements or other increases in owner costs. Delaware has this kind of policy, which also prohibits rent increases in parks with health and safety violations. 180
- Corporate landlords and other industry lobbyists have been highly successful in passing state bans of local rent regulations, making efforts like Illinois' Lift the Ban and similar campaigns across the country to end these bans especially important. 165

### Pass "good cause" for eviction and lease non-renewals



Good cause policies prohibit manufactured home park owners from evicting or refusing to renew leases for arbitrary, retaliatory, or discriminatory reasons, defining instead a list of allowable "good" or "just causes."

- Good cause is most effective when paired with rent regulations to prevent park owners from dramatically raising rents to force someone out.
- Michigan's just cause law protects mobile home residents from arbitrary eviction.<sup>181</sup>
- Delaware provides for automatic renewal of leases unless landlords demonstrate a good cause for non-renewal. Policies may also require relocation assistance and terms when residents are evicted or parks are closed. 180

• Protect residents from retaliation, harassment, and discrimination



Manufactured home residents — especially those who advocate for healthier conditions — can face retaliation from park owners, including eviction, harassment, and involvement of the police or Immigrations and Customs Enforcement (ICE). Local and state governments should pass policies to protect residents, including:

- Anti-retaliation policies that protect residents who demand better housing conditions, like <u>Colorado</u> and <u>Illinois</u><sup>182,183</sup>
- Anti-harassment ordinances that ban all landlord harassment as <u>Oakland</u>, <u>CA</u> has done in all rental housing<sup>184</sup>
- Policies that prohibit discrimination against tenants using Section 8, like Virginia<sup>185</sup>
- Policies that prohibit discrimination against undocumented or mixed-status families, and prohibitions against calling, or threatening to call, ICE or police in retaliation (<u>California</u> for example, prohibits landlords from asking about immigration status)<sup>186</sup>

### Immigrant residents face significant discrimination, push for change

Immigrant families often face housing discrimination and high cost burdens, leaving many housing options out of reach. Manufactured housing provides a relatively affordable place to live for these families — almost a million households living in manufactured housing nationally are headed by non-citizens or naturalized citizens (not born in the US).<sup>187</sup>

While federal law prohibits housing discrimination against immigrants, many continue to be denied housing or face worse conditions. For instance, a prominent federal appeals court case from Virginia recently ruled against a park owner who had required tenants to provide proof of their immigrant status, denying leases and raising rents for those who did not.<sup>188</sup> Reports of similar discrimination and poor conditions have emerged across the country and in our conversations with an expert from the Legal Aid Justice Center.<sup>189</sup> However, immigrant communities have also fought for and won statewide protections like California's law prohibiting landlords from asking about immigration status.<sup>190</sup> There are significant opportunities to advance similar protections in the years ahead.

Require fair leases and community rules



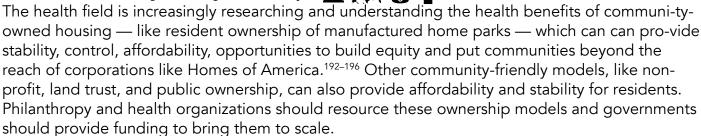
Local and state governments should pass laws that prohibit leases, lease-to-own contracts, and park rules that are arbitrary, discriminatory, or predatory. They should prohibit park owners from forcing residents to sign waivers of their basic rights as Homes of America has in West Virginia. Leases and other documents should also be available in multiple languages, and/or available with translation and interpretation services.

 Colorado's <u>Protections for Mobile Home Park Residents</u> law limits the ability of park owners to change rules that apply to homeowners' homes and sets out other protections against unfair practices.<sup>191</sup>

### 3) Promote and resource community-friendly ownership

Provide funding and pass policies that enable residents to transition from corporate to community-friendly ownership of manufactured housing communities like nonprofit, land trust, public, and resident ownership.

### Resource community-friendly ownership 🏦 🗬 父 🞎



- Speculation and vacancy taxes, public banks, and unions' pension investments can all help fund community ownership models, and Fannie Mae and Freddie Mac should increase financing for community-friendly ownership models.9
- Boulder, Colorado helped the La Luna Cooperative buy their manufactured home park. 197
- The nonprofit Family Promise has purchased communities in Michigan.

### Enable community purchases



Large corporations are often able to quickly purchase properties in cash, making it hard for residents and communities to buy their own parks even when they have the resources to do so. State and local governments should pass policies that guarantee residents receive notice when an owner puts a park on sale, receives an offer, or intends to change its use. Policies should also offer residents, nonprofits, and public agencies the right to make the first offer on a park and to match other offers. 170,171

- The National Consumer Law Center has created <u>model resident</u> purchase legislation and a Policy Guide which lay out the elements of effective policies — like applying to all sales, notifying all residents, reasonable timeframes, etc. 199,200
- Bills proposed in Michigan would have ensured residents receive notice and can make an offer. 172
- The state of New York recently passed a right of first refusal, although the bill could have contained stronger enforcement provisions.<sup>201</sup>

### Montevista Comunidad residents win control of their own park

After two parks in their neighborhood closed, the residents of Capital City Mobile Home Park were worried that they would also lose their homes or become tenants of corporate speculators. Fortunately, Colorado is one of the states where residents have won the first opportunity to buy their homes when they are put up for sale. With support from 9-5 Colorado and Justice for the People Legal Center, the residents of Capital City set out to try to purchase their park. They successfully raised \$11.5 million, including \$ 2.6 million from the City of Denver, and worked with the nonprofit Sharing Connection to buy the park, which is now known as Montevista Communidad. After an interim period, Sharing Connection will transfer the park to full resident ownership and the residents of Montevista Communidad will be in control of their own community.<sup>202</sup>

### 4) Address the root cause by limiting corporate speculation

Enact protective zoning regulations, impose portfolio caps, divest resources, and increase taxes on speculative investments to deter corporate profiteering.

- Limit portfolio size 🟦 💓 🧕
  - Federal, state, and local governments can all limit the growth of speculators like Homes of America by capping the number of properties they can buy in a jurisdiction, for instance as part of licensing programs, or by creating taxes that escalate based on portfolio size, taxes on vacant property or lots, or taxes for flipping properties.<sup>170,171</sup>
- Withdraw taxpayer support for bad actors
  While Homes of America does not heavily utilize federally-backed mortgage financing through Frannie Mae and Freddie Mac, many similar investors depend on it, even as their residents face displacement and unhealthy conditions. While these entities have taken some steps to protect residents, they are inadequate. The federal government should create standards for federally-backed borrowers including limits on rent increases, fair lease terms, and habitability standards. 11
- Use zoning to allow and preserve manufactured home communities

  Many local jurisdictions have used zoning to exclude manufactured home parks, and these codes need to be updated to allow new park development. Existing parks often face pressure from speculators looking to close them and convert them to other uses. Cities and counties can proactively zone these communities exclusively as manufactured home parks to prevent speculation and closure, as Boulder, CO has done. 203,205,206
- **Divest pensions from bad actors**Unions can pressure bad actors by using their power as shareholders to divest their pension systems from these corporations or demand less harmful business practices. They can also pressure their employer to divest its resources, as <u>labor organizations have done</u> regarding the University of California's investments in Blackstone.<sup>207</sup>

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### **Appendix**

## **Table 1:** Communities of residents interviewed for research project

These communities are under the ownership of Homes of America within the timeframe of the research study according to property searches conducted by Private Equity Stakeholder Project.

State	Name of HoA Community	Number of Residents Interviewed			
Florida	Lake Runnymeade Mobile Home Park	1			
Illinois	Lake Suzanne Mobile Home Park / Lake Suzanne Mobile Acres	2			
Michigan	River Grove Mobile Home Park / River Grove Estates / River Springs Estates	3			
	North Morris Estates	3			
	Baltimore Terrace Mobile Home Park	3*			
Virginia	Six-O-Five Village Mobile Home Park	3			
West Virginia	Elk View Estates / Elkview Mobile Home Park	1			
	Gardner Estates / Gardner Mobile Home Park	2			
	Shadow Wood Mobile Home Park / Shadow Wood Valley Mobile Home Park	2			
Total	9 Communities**	20 Residents			

<sup>\*</sup>Includes one resident who was employed as a property manager

### Sampling Method

We utilized a convenience sampling method to recruit residents for interviews, which is typical of qualitative research. This method allows researchers to select research participants who are accessible, available, and interested in participating in research activities. Residents were primarily recruited and recommended by resident leaders and organizing staff from Manufactured Housing Action. The study sample of participants may not represent all residents residing in Homes of America properties.

<sup>\*\*</sup>We requested public records for 10 communities total which include the 9 listed above as well as Lake Bradford Estates Mobile Home Community in Florida

**Table 2:** Sociodemographic, housing, and health characteristics of residents living in census tracts with Homes of America properties

average

States with census tract level data where Homes of America commu- nities are located	% Disabil- ity^	% Poverty^	Households with annual income less than \$75,000 that spend 30% or more of their household income on housing^	Fair or poor self-rated health status among adults aged ≥18 years (Report general health status as "fair" or "poor")†	Mental health not good for ≥14 days among adults aged ≥18 years (Mental health (including stress, depression, and problems with emotions) was not good for 14 or more days during the past 30 days)†	Physical health not good for ≥14 days among adults aged ≥18 years (Physical health (including physical illness and injury) was not good 14 or more days during the past 30 days)†	Depression among adults aged ≥18 years (Ever told by an health professional that they have a depressive disorder)†	High blood pressure among adults aged ≥18 years (Been told by a health professional in the last 12 months they have high blood pressure)†	Chronic obstructive pulmonary disease among adults aged ≥18 years (Ever been told by a health professional that they had chronic obstructive pulmonary disease (COPD), emphysema, or chronic bronchitis)†	Current asthma prevalence among adults aged ≥18 years (Ever been told by a health professional they have asthma AND answer yes to "Do you still have asth- ma?")†
Alabama	15.1%	10.2%	23%	23%	19%	15%	25%	41%	9%	11%
Florida	16.8%	18.6%	31%	20%	17%	14%	20%	N/A	8%	10%
Georgia	18.1%	12.7%	22%	20%	17%	13%	21%	37%	7%	11%
Illinois	13.9%	10.6%	23%	19%	16%	13%	19%	32%	6%	10%
Indiana	15.3%	14.2%	21%	20%	18%	14%	24%	35%	9%	11%
Louisiana	15.4%	13.6%	20%	23%	20%	15%	27%	40%	9%	11%
Maine	21.0%	7.7%	20%	16%	16%	13%	26%	34%	9%	12%
Michigan	13.2%	11.1%	22%	18%	17%	13%	24%	35%	8%	12%
Mississippi	17.2%	28.6%	36%	24%	17%	15%	21%	44%	9%	11%
Missouri	12.8%	7.3%	25%	20%	18%	15%	24%	36%	9%	11%
North Carolina	11.4%	3.3%	39%	19%	16%	13%	23%	35%	8%	10%
North Dakota	12.9%	6.8%	18%	16%	15%	11%	22%	31%	6%	11%
Oklahoma	13.5%	29.6%	39%	22%	19%	15%	28%	38%	9%	12%
Pennsylvania	9.0%	6.0%	18%	19%	17%	13%	23%	33%	8%	11%
Tennessee	21.7%	14.0%	19%	22%	20%	15%	30%	38%	10%	12%
Virginia	18.2%	12.2%	20%	17%	17%	13%	23%	34%	7%	10%
West Virginia	22.4%	21.3%	20%	26%	21%	18%	28%	43%	12%	12%
Wisconsin	16.3%	18.2%	36%	17%	16%	12%	24%	32%	7%	11%
National	13.40%	12.50%	14%	17.90%	15.80%	12.70%	21%	32.70%	6.80%	9.90%