

# ZONING PRACTICE

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**Equitable Zoning for Manufactured Housing** 



In this Issue: The Importance of Manufactured Housing | Negative Perceptions and Restrictive Zoning | Assessing Local Zoning | Considerations for Code Updates | Conclusion

# **Equitable Zoning for Manufactured Housing**

By George Frantz, AICP

In the 50 years that have passed since the National Manufactured Housing Construction and Safety Standards Act of 1974 was signed into law, manufactured housing has remained an underexploited opportunity for providing millions of Americans with decent affordable housing. Only 18 states have laws that ensure local zoning codes do not discriminate against manufactured housing (Table 1), and historic stereotypes and prejudices still inform many communities' zoning regulations.

There is, however, increasing attention being given to manufactured housing as communities around the country confront the housing affordability crisis. The American Planning Association's Equity in Zoning Policy Guide specifically calls for reforms that establish manufacturing housing as a permissible use in many residential zoning districts, allow for the

creation of new manufactured housing communities, and protect existing manufactured housing parks and their residents from displacement. Additionally, President Biden's Housing Supply Action Plan includes multiple actions to broaden manufactured housing opportunities.

This issue of Zoning Practice examines the persistent inequitable treatment of manufactured housing in many local zoning codes and offers considerations for code updates. It begins with brief summaries of the important role manufactured housing plays in supporting housing choice and affordability and the common stigmas and forms of regulatory discrimination that this type of housing faces in many communities, and it includes findings from a five-state analysis of zoning regulations for manufactured housing.



A manufactured home in a retirement community in Boynton Beach, Florida (Credit: felixmizioznikov, iStock Editorial / Getty Images Plus)

# The Importance of Manufactured Housing

Manufactured housing is a specific type of factory-built housing constructed after June of 1976 that has at least 320 square feet (30.2 m<sup>2</sup>) and is constructed on a permanent chassis in accordance with the U.S. Manufactured Home Construction and Safety Standards (42 U.S.C. §5402). The typical manufactured home comes in one of two forms: single-section (single-wide) homes transported from factory to site in one piece or two-section (double-wide) homes that are transported in two or more sections and assembled onsite. Under federal law, manufactured homes are required to be professionally installed in accordance with U.S. Department of Housing and Urban Development (HUD) installation standards.

Nearly 16.7 million people live in manufactured homes (USCB 2023a); that's approximately five percent the total U.S. population. While manufactured housing as a percentage of the country's housing stock has declined from 6.7 percent in the 2006–2010 American Community Survey five-year estimates to 5.8 percent in the 2018–2022 five-year estimates, it remains a key resource, particularly in rural areas

(USCB 2023b). In the 1,958 nonmetropolitan counties (or county equivalents) it accounted for 12.6 percent of occupied housing units (USCB 2023c; USDA ERS 2024).

In 2022, some 112,882 manufactured housing units were shipped across the U.S., with the overwhelming proportion of the top 10 recipient states being in the South and Southeast, where eight states absorbed just under 60,000 manufactured housing units, or 53 percent of total production that year (USCB 2023f). Texas alone absorbed some 19,865 new units in 2022, or almost 18 percent of the nation's production.

Contrary to the common perception of manufactured housing being sited predominantly on rented lots, in 2022, 64 percent of purchasers sited new manufactured homes on land they owned, either through a condominium arrangement in a manufactured home community or on an independent lot (USCB 2023g). Furthermore, these homes typically sell for far less, on average, than new site-built homes. In 2022, the average cost per square foot for a manufactured home was \$90.27, compared to \$168.35 for site-built homes (USCB 2023g).

One-half of a double-wide manufactured home on its way to a homesite (Credit: constantgardener, iStock / Getty Images Plus)



Most households who live in manufactured homes earn less than \$40.000 per year, and the percentage of that are cost-burdened is less (27.8 percent) than for households residing in duplexes (43.9) percent) and apartment buildings (46.3 percent) (USCB 2023d&e). This makes manufactured housing the largest unsubsidized source of affordable housing in the nation (Gorey 2023: USCFPB 2021).

Manufactured-home owners may finance the purchase of their homes through a real estate mortgage loan, as real property, or finance it as personal property through chattel financing. Around 42 percent of manufactured homes are financed through chattel loans. Even in cases where the homeowner also owns the underlying land, some 17 percent of homes are financed using chattel loans (USCFPB 2021).

# **Negative Perceptions and Restrictive Zoning**

In May of 2022 the White House announced a set of policy actions to address high housing costs. Included in the package of proposals were new financing mechanisms through Freddie Mac for manufactured housing to reduce the cost of personal property financing that many manufactured housing purchasers must rely on. Another policy proposal was for the federal government to develop incentives for local governments to enact zoning reforms to reduce regulatory barriers to manufactured housing and increase the amount of land zoned to permit both individual homes as well as for developing new manufactured home communities.

The reality is that the potential for manufactured housing to take a larger role in resolving the affordable housing crisis is hobbled by prejudicial zoning regulations and legal case law. As Daniel R. Mandelker has noted, "The courts have largely upheld unequal treatment in a variety of zoning regulations. Zoning is economic regulation and the rational basis standard of judicial review that applies to economic regulations supports these decisions. In applying this judicial review standard, however, the cases make assumptions about manufactured housing that are no longer true" (2016).

Despite the dramatic improvement in quality of construction after National Manufactured Housing Construction and Safety Standards Act of 1974 and the Manufactured Housing Improvement Act of 2000, and the more recent implementation of state energy codes mandating increase energy efficiency, the "mobile" home continues to be treated as inferior housing at best, and too often undesirable housing, to be heavily restricted if not completely zoned out of communities.

Even though the manufacture of mobile homes effectively ceased with the advent of the Manufactured Home Construction and Safety Standards, the perceptions associated with it continue to influence landuse and housing policies.

Even though the manufacture of mobile homes effectively ceased with the advent of the Manufactured Home Construction and Safety Standards, the perceptions associated with it continue to influence land-use and housing policies. The old prejudices—perceptions that manufactured housing is aesthetically inferior and incompatible with the American ideal of what constitutes "good" neighborhood character; that not restricting the location of manufactured housing would depreciate the market value of traditional stick-built housing and threaten the community's tax base; that manufactured housing is of low-quality construction that can attract "low quality" residents—persist.

Lack of knowledge by the public is a significant obstacle to manufactured housing being accepted as a legitimate residential architecture. In a recent survey conducted for Freddie Mac, 53 percent of respondents had either never heard of manufactured housing or were not very familiar with it (2022). Another misperception identified in the survey is that "manufactured homes are only available in rural communities and are not a good option if you want to live in the city or suburbs." Some 47 percent of respondents



Mobile homes at a work camp in New York State in 1964 (Credit: atlantickid, iStock / Getty Images Plus)

strongly or somewhat agreed with this statement, and 15 percent responded that they did not know. Some 50 percent of respondents either believed that manufactured homes are only for temporary housing and not for long-term living or did not know.

In light of persistent prejudices and a basic lack of understanding, it is, perhaps, unsurprising that many residential zoning districts are designed primarily to segregate manufactured housing and its occupants. Manufactured housing may be carefully defined in a variety of ways but is still referred to in many jurisdictions as a *mobile home*. Manufactured homes are also rarely provided protections against incompatible uses and indeed are often confined to zoning districts where other less desirable land uses, such as commercial and industrial uses, are permitted or are relegated to special-purpose districts adjacent to those uses.

The design and mobility of pre-1974 mobile homes, which facilitated their use by itinerant workers in the construction and energy industries, was quickly imprinted in the American public's perception. Mobile homes became synonymous with poorly designed and constructed camps. Aesthetic issues with these early communities were seized upon as a rationale for regulating and segregating first mobile homes and today, despite the

huge improvements in quality and energy efficiency, regulating and segregating manufactured housing. As Mandelker notes, aesthetic concerns have been upheld by the courts, in almost half of U.S. states, aesthetics can be the only justification advanced to support restricting manufactured housing.

In some case zoning can mandate that manufactured homes must comply with what Mandelker refers to as "look alike" code requirements to pass as being compatible with the character of the surrounding neighborhood architecture. An extreme example is a community that not only restricts the 59 manufactured homes that exist in the city of almost 11,000 to three tiny manufactured home parks, but mandates that they "...shall be of a color and placed or landscaped in such a way as to be visually unobtrusive..."

The question of visual compatibility often zeroes in on architectural characteristics, such as flat roofs and metal or vinyl siding, the gap between the bottom of a manufactured home and ground level, and the visibility of axles and other chassis components. Ironically, the flat roofs of manufactured housing evolved as an issue for planners at the same time flat roofs on architect designed homes were seen (briefly) as the future of residential design. Fortunately for those who can afford the traditional looking "double-wide" manufactured housing that is typically constructed in the classic American ranch home style, these "look alike" restrictions are not as large an obstacle.

# **Assessing Local Zoning**

For this issue, I analyzed a sample of 136 local zoning ordinances across five states: Florida, Michigan, New York, Texas, and Wyoming. Florida, Michigan, and Texas are three of the top five states in manufactured home deliveries in 2022. together accounting for 30 percent of manufactured housing units produced that year. Texas and Florida also continue to have substantial population growth. I selected New York because it is a state with a strong home rule tradition that has devolved planning and zoning powers to cities, towns, and villages. Moreover, many local governments, especially suburban

governments in New York, have historically been hostile to manufactured housing. Wyoming was selected because it ranks relatively high (in per-capita terms) in the placement of manufactured homes (15th in the nation in 2022) and it has a predominantly rural population.

In all five states, zoning is implemented at the county level or lower, and of the 136 zoning codes sampled, 127 were subcounty municipalities. Eight of the nine sampled counties are in Wyoming, and in several of these counties, the zoning does not cover all unincorporated areas. My analysis involved reviewing areas of the zoning codes related to manufactured housing: definitions for dwellings, mobile homes, manufactured homes, and manufactured home parks; lists or tables of permissible uses by district; and specific design parameters applied to this type of residential architecture.

■ Table 1. States That Preempt Aspects of Local Zoning for Manufactured Housing

State	Limit on Local Zoning Authority
Arkansas	Municipalities must permit manufactured homes on individually owned lots in at least one residential district and cannot subject them to standards that don't also apply to other single-family dwellings (§14-54-1604).
California	Cities and counties must permit manufactured homes sited on foundations on all lots zoned for conventional single-family residential dwellings and cannot subject them to standards that don't also apply to other homes (Government Code §65852.3(a)).
Colorado	Municipalities may not enact zoning, subdivision, or other regulations that affectively exclude manufactured housing or subject them to standards that don't also apply to other homes (§31-23-301(5)(b); §31-23-303(3)).
Connecticut	Municipalities may not impose conditions and requirements on manufactured homes built under federal standards over 22 feet wide that are substantially different from those imposed on other single-family dwellings (§8-2(d)(3)).
Florida	Municipal and county regulations regarding housing must be reasonable and uniformly applied and enforced without any distinction as to whether a building is a conventionally constructed or manufactured building (§553.38).
Idaho	Municipalities and counties must permit manufactured homes on all lands zoned for single-family residential uses, except for lands falling within an area defined as a historic district, subject to maximally restrictive placement standards (§67-6509A).
lowa	Cities and counties cannot apply more restrictive standards to a manufactured home than those which apply to a site-built, single-family dwelling on the same lot and must comply with maximally restrictive construction and design standards (§414.28; §335.30).
Maine	Municipalities must permit manufactured homes on any lot where single-family dwellings are allowed, subject to the same standards as single-family dwellings and must comply with maximally restrictive standards for manufactured housing communities (§30-A-4358(2)).

■ Table 1 (continued). States That Preempt Aspects of Local Zoning for Manufactured Housing

State	Limit on Local Zoning Authority
Nebraska	Municipalities and counties must permit manufactured homes on any lot where single-family dwellings are allowed, subject to maximally restrictive standards (§14-402(2); §15-902(2); §23-114(3)).
New Hampshire	Municipalities must permit manufactured homes on individual lots in most, but not necessarily all, areas zoned to permit residential uses (§674:32.1).
New Jersey	Municipalities may not exclude or restrict the use, location, or placement of manufactured homes on individual lots that are at least 22 feet wide and sited on a foundation, unless such regulations are equally applicable to all buildings and structures of similar use (§40:55D-104).
New York	Municipalities must permit manufactured homes affixed to a permanent foundation that conform with identical standards applicable to site-built single-family dwellings, as a conforming single-family dwelling (Executive Code §615 et seq.).
Oregon	Within urban growth boundaries, municipalities and counties must permit manufactured homes in all zoning districts that allow single-family dwellings and cannot subject them to standards that would not apply to a site-built detached dwelling and must accommodate manufactured housing communities, subject to a needs assessment (§197.478; §197.480).
Pennsylvania	Municipalities must provide for the use of land within the municipality for residential housing of various dwelling types, including "mobile homes" and "mobile home parks" (Municipalities Planning Code §604(4)).
Texas	Municipalities shall permit manufactured housing "in any area determined appropriate by the municipality, including a subdivision, planned unit development, single lot, and rental community or park" (Occupations Code §1201.008).
Vermont	Municipalities may not exclude "mobile homes," except upon the same terms and conditions as conventional housing may be excluded (§24-4412(1)(B)).
Virginia	Municipalities and counties must permit manufactured homes on permanent foundations in agricultural districts, subject to development standards that are equivalent to those applicable to site-built single-family dwellings (§15.2-2290(A)).
Washington	Municipalities and counties must permit manufactured homes in the same manner as site-built homes, factory-built homes, or homes built to any other state construction or local design standard, subject to maximally restrictive standards (§35.21.684; §36.01.225).

Although manufactured housing is permitted as of right in many single-family neighborhoods throughout the country, exclusionary zoning practices are still commonplace. In the five states sampled, the percentage of local zoning ordinances that permit single-wide manufactured housing in all residential zoning districts (including agricultural districts) was only 49 percent in Wyoming and 38 percent in Michigan, the two most accommodating states, and just registering on the scale at seven-, eight-, and nine percent in Florida, New York, and Texas, respectively. Surprisingly, 50 years after its supposed demise, some 59 percent of zoning codes still use

mobile home, compared to just 49 percent that use *manufactured home*, while many codes retain both definitions.

#### Florida

Florida law broadly preempts local zoning regulations that single out manufactured housing; however, many local jurisdictions in the state still have exclusionary provisions in their codes. In the codes sampled in Florida, zoning regulations for manufactured housing lean more toward segregation than all states except New York.

Single-wide, standalone manufactured homes on individual lots were permitted in all residential districts in only seven

percent of the 31 jurisdictions sampled, and only 10 percent permitted them in some, but not all, residential zoning districts. The zoning codes in 59 percent of the Florida communities also restrict manufactured housing to mobile home/ manufactured home park districts. These developments can be in the form of leasehold enterprises, where the park owner leases out sites to homeowners, or they can be organized as condominium or cooperative housing, but, nonetheless, segregated from stick-built neighborhoods.

# Michigan

In Michigan, 38 percent of the 22 municipalities sampled permit manufactured housing in all conventional residential zoning districts, while only seven restrict them solely to manufactured or mobile home parks. Ten municipalities treat manufactured housing the same as stick-built homes, provided units are at least 22 or 24 feet wide (i.e., "double-wide" homes). Common additional thresholds in the Michigan zoning codes include the following:

- Minimum floor area requirements (generally 1,080 square feet) for the district in which it is located
- Design requirements stipulating the manufactured home "shall be aesthetically compatible in design and appearance with other dwellings in the general vicinity with either a roof overhang of at least six inches on all sides, or alternatively with window sills or roof drainage systems that concentrate roof drainage at collection points along the sides of the dwelling"
- Design requirements stipulating that manufactured homes "have a sloped roof of a pitch of not less than 3:12 for and on the principal or main portion of the mobile (sic) home."

As Mandelker notes these "look alike" code requirements can increase the cost and erode the affordability of manufactured housing.

# **New York**

In 2015, New York became the latest state to adopt a law preempting aspects of local zoning for manufactured housing. This law clearly states that any manufactured home

"affixed to a permanent foundation," which "conforms with the identical development specification and standards, including general aesthetic and architectural standards, applicable to conventional, site-built single-family dwellings in the residential district in which the manufactured home is to be sited, shall be deemed to be a conforming single-family dwelling for purposes of the applicable local zoning law or ordinance" (Executive Law §616). Unfortunately, it appears to have had little or no impact on local zoning regulations in the state.

In 2015, New York became the latest state to adopt a law preempting aspects of local zoning for manufactured housing.

A survey of zoning regulations in 24 municipalities in two Upstate New York metro areas revealed that 57 percent of local governments restrict manufactured housing to leasehold manufactured housing communities; 30 percent prohibit them outright; and only 20 percent of local governments permit them in conventional residential zoning districts. Two of the more rural municipalities in the New York sample permit double-wide manufactured housing in all residential zoning districts.

The approval process for leasehold manufactured housing parks in New York is also often a discretionary action on the part of local government, often through required special use permit/conditional use reviews. Under New York's Town Law, a special use permit is defined as "...an authorization of a particular land use which is permitted in a zoning ordinance or local law, subject to requirements imposed by such zoning ordinance or local law to assure that the proposed use is in harmony with such zoning ordinance or local law and will not adversely affect the neighborhood if such requirements are met" (§274-B). This process can quickly become an expensive gamble by a prospective developer.

Even though the New York courts ruled in the 1950s that a special use permit cannot be denied without substantive

evidence, the common perception on the part of municipal officials is that a special use permit is akin to a use variance. Proposed projects are exposed to often vague and arbitrary standards and the vagaries of New York's environmental impact review process especially in the face of public opposition.

As commonly noted in the literature on zoning restrictions and manufactured housing, the nine municipalities in the sample that outright prohibit manufactured housing are the more affluent ones: Their median household incomes, averaged together, were just under \$90,000, or 120 percent of the statewide median household income in New York.

#### Texas

Texas is home to a high percentage of manufactured housing units and, since 1994, has accounted for the largest number of new manufacturing homes placed in the U.S., some 545,535 or 12 percent of total shipments nationwide. Texas also has a law in place that requires accommodation for manufactured housing in local land-use regulations, but only "in any area determined appropriate by the municipality." It is the weakest of the 18 laws that preempt aspects of local zoning for manufactured housing.

In Texas the power to adopt zoning and regulate the location of manufactured housing is (almost exclusively) vested in incorporated cities. Much of the land in the state, however, is located outside incorporated municipalities, in unincorporated areas of counties. Counties in Texas have very little authority to regulate land-use, with their jurisdiction limited to adoption and application of design standards for streets and other infrastructure within manufactured housing parks.

A study of manufactured housing and zoning in 33 local governments in the Houston metropolitan area revealed that 42 percent of local governments sampled only permit manufactured housing in manufactured housing communities; 51 percent prohibit them outright; and only 18 percent of local governments permit them in at least one, but not all, conventional residential zoning districts. Six municipalities restrict where manufactured housing is permitted simply by excluding it from the definition of "dwelling" or "single family dwelling" within the zoning. While the remaining municipalities may not explicitly ban manufactured homes or manufactured home parks, de facto bans may exist in some municipalities because they do not provide for any process for approving such development, or the zoning

An older manufactured housing community south of Houston. near the Gulf Coast of Texas (Credit: Art Wager, iStock / Getty Images Plus)



regulations do not specifically reference manufactured housing or manufactured housing parks as an allowable use within their jurisdictions, or do not have definitions of such uses (Rumbach et al. 2022).

For manufactured housing parks, the obstacles in the Houston area echo those in New York: discretionary approval by a local board of council with associated costs and potential for a politized review environment, such that, even if the developer wins approval, the burdensome costs incurred by the review process drive up the cost of the development and erode the affordability of manufactured housing.

#### Wyoming

Wyoming has not adopted legislation that bars local governments from discriminating against manufactured housing. It is largely un-zoned due to its very low population density and the prevalence of small cities with low governmental capacity for implementing land-use controls. The average population of the 10 counties in the sample, which are also home to the largest cities in the state, is just 32,680 persons, and two of the 10 counties have no zoning at the county level. The average population of the 22 incorporated cities and town in the sample counties is 10,144 persons, and six out of the 22 have no zoning in place. Of the 27 county and municipal zoning regulations in Wyoming that were surveyed, only four, or 15 percent, restrict manufactured housing to manufactured housing communities (including leasehold communities and subdivided lots); only one municipality prohibits them outright, while one other county and its largest municipality have de facto prohibitions, since their zoning districts that permit manufactured housing parks are fully developed. Overall, Wyoming's counties and cities are much more welcoming than New York, with 58 percent permitting manufactured housing as of right in one or more residential zoning districts (though 19 percent require these to be double-wide units) and 33 percent permitting them in all residential zoning districts.

While local government in Wyoming is in general more welcoming of manufactured housing, several cities and towns in Wyoming also have placed aesthetic-related restrictions aimed at

protecting community character. Five have in place definitions that define manufactured homes for zoning purposes, as being more than 20 feet or 24 feet wide, in effect a double-wide manufactured home. Several have design standards for manufactured housing, such as requiring a pitched roof with a minimum slope; non-reflective roof materials similar to those used on stick-built homes: a roof overhang of not less than eight inches: and siding composed of wood or wood products, stucco, brick, horizontal lap metal, or vinyl siding.

# **Considerations for Code Updates**

There are three key questions for planners, local officials, and other community stakeholders to answer when reviewing local zoning regulations for manufactured

- 1. Do they comply with state zoning enabling laws, with regard to manufactured housing?
- 2. Do they regulate manufactured homes as a form of residential architecture differently from stick-built homes and, if so, is there a legitimate, rational planning basis for why they are regulated differently?
- 3. Are outdated restrictions on and design standards for manufactured homes impeding efforts to address the critical housing affordability crisis in your community?

Planners need to take a critical look at all options in addressing housing affordability in their communities and the potential for manufactured housing to provide decent affordable housing.

#### **Compliance With State Laws**

With one in three states now having laws curbing local government powers to restrict manufactured housing, planners need to be alert to this trend and ready to respond should their states consider



A contemporary manufactured home sited on an individually owned lot (Credit: ucpage, iStock / Getty Images Plus)

enacting similar regulations. In our pursuit of equity in zoning, we planners have an obligation to support such legislation, as well as provide cities, towns, and counties with the tools to ensure their zoning is in conformance with such legislation if it is adopted. Planners in states that have enacted such curbs have a critical role in ensuring that local governments are in conformance with state law. In local governments that may not be compliant, planners have a responsibility to advocate for amending local zoning codes, provide needed technical support to local officials, and educate local officials and the public about the potential for manufactured housing to provide high-quality affordable options that can help address our housing crisis.

# **Equal Treatment With Site-Built Homes**

Historically, design controls on homes were through deed covenants and restrictions placed on lots by developers, with the acquiescence of the original and subsequent homeowners. Zoning regulations were traditionally limited to control of land use, density, and scale.

For site-built homes, compliance with construction codes, not style, continues

to be the primary focus of permit reviews. However, with manufactured housing. the character of the architecture itself, is often the regulatory focus. There are rational public policy reasons for some. For example, the requirement for a shingled roof with 3:12 pitch may be based on aesthetic compatibility, however such roofs can also promote energy efficiency, shed rain better, and are more suited to snowy climates. But minimum width standards for manufactured housing units and siding materials appearance standards, while upheld by the courts as legitimate, need to also be considered in the light of housing affordability and equity.

# Overall Effect on **Housing Affordability**

Planners need to take a critical look at all options in addressing housing affordability in their communities and the potential for manufactured housing to provide decent affordable housing. Especially in older cities where residential parcels often do not meet minimum lot dimensional requirements, single- and double-wide manufactured homes could provide affordable infill housing without triggering variance reviews, or the expense of homes individually designed to fit local zoning.

Of the five larger cities (pop. 100,000+) in this study, however, one bans manufactured housing outright, and three limit it to manufactured home parks, while only two permit it in some single-family zoning districts. By looking beyond manufactured housing as low-density suburban and rural housing, planners can institute zoning reforms in cities that can also stimulate the development of new forms of manufactured housing adapted specifically to urban markets.

#### Conclusion

While the analysis above is not comprehensive, it does indicate that planners in the U.S. need to review and reassess zoning regulations and land-use policies that have been applied to, not a particular land use, but to one particular type of residential architecture. Manufactured housing has evolved over the past 50 years, from the low-quality, energy-inefficient mobile home of the 1960s to the well-built, energy-efficient, and durable manufactured home of today. It can be an alternative and affordable home for low- and middle-income residents in communities across the country.

Despite this, it seems many planners and local officials have not shaken off old prejudices: Just one-third of the zoning codes reviewed in this sampling permit single-wide manufactured homes in all single-family residential zoning districts, while 61 percent restrict them to mobile/ manufactured housing zoning districts. It is for good reason that APA's Equity in Zoning Policy Guide calls on planners across the country to work with municipal officials and local residents to eliminate prohibitions and other restrictions on manufacturing housing that are grounded in old misperceptions and biases.

The answers to the three key guestions above can be the starting point for reforming local land-use regulations pertaining to manufactured homes. They can also provide a framework that planners can utilize in educating elected officials and their constituencies on a key issue affecting housing affordability and in promoting a community dialogue on zoning and its purposes, and its unintended impacts on housing affordability.

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