

# MANUFACTURED HOME COMMUNITIES IN NEW HAMPSHIRE

## STATE, LOCAL AND MUNICIPAL MANUFACTURED HOUSING POLICY

New Hampshire's manufactured housing policies are often heralded as models for other states—its titling policy (which automatically titles all manufactured homes as real property) and its purchase opportunity law provide sound policy foundations to help families build wealth through their homes and achieve security of tenure in communities.

There are a number of organizations in the state that have worked for years to shape policy environment that works well for both homeowners and industry. New Hampshire homeowners are actively engaged in a strong homeowners' association, the Manufactured Home Owners and Tenants Association of New Hampshire (MOTA-NH). Homeowners in the state also benefit from the leadership of the New Hampshire Community Loan Fund and ROC USA® (both based in Concord, NH) in the development of affordable loan products and financing for individual borrowers and residents seeking to purchase the land on which their homes sit. The New Hampshire Housing Finance Authority has been a strong ally for homeowners as well.

This snapshot surveys key statewide policies, and then looks at local policies in three counties: Rockingham, Merrimack, and Stafford.

## LAWS PROTECTING HOMEOWNERS IN MANUFACTURED HOME COMMUNITIES



**Affirmative protections for fundamental freedoms.** Some states provide protections for residents of manufactured housing communities, including the fundamental right of free movement, speech and assembly or association. In New Hampshire does not provide affirmative protections for these rights.

**Protection against retaliation.** Even states that do not provide affirmative protections for residents' fundamental freedoms often prohibit community owners from retaliating against residents for exercising their legal rights. New Hampshire broadly prohibits retaliation against community residents for asserting a right or engaging in an activity protected by law, including the right to meet or gather with other residents. Landlords cannot retaliate against the resident for taking legal action or reporting a violation of the law or regulation to an appropriate governmental agency. N.H. Rev. Stat. Ann. § 540 :13-a (incorporating N.H. Rev. Stat. Ann. § 205-a:9).

**Notice before community closure.** About half the states require a substantial notice period before a manufactured home community closes. New Hampshire law provides 18 months' notice to residents in the event of condemnation or use of the property for some other purpose.. N.H. Rev. Stat. Ann. § 205-A:3(III).



This policy snapshot reviews state and local policies that affect homeowners, home buyers, nonprofit dealers, developers and others with a stake in manufactured housing as a source of affordable housing. These policies include:

- Laws protecting homeowners living in manufactured home communities
- The right to treat manufactured homes as real property
- State programs & policies
- Local and municipal policy environment

**Purchase opportunity.** Homeowners in manufactured home communities are vulnerable because they do not own the land under their homes. New Hampshire is one of nineteen states with a policy on the books to require or encourage community owners to give residents the opportunity to purchase the land on which their home sits. Residents must receive notice sixty days before the owner accepts an offer to sell or transfer the community and they have a right to make a competing offer to purchase the community from the owner. The policy is one of the strongest nationwide, and requires the community owner to consider and negotiate in good faith with residents if they offer to purchase the community. N.H. Rev. Stat. Ann. § 205-A:21.

**Protection against arbitrary eviction.** Homeowners in manufactured home communities are protected from arbitrary eviction from the community. Residents cannot be evicted unless they failed to pay the lot rent, violated a community rule or a law, damaged the property, or repeatedly created a disturbance which impaired other residents' enjoyment of the community. Failure to follow an unreasonable community rule or regulation is not grounds for eviction. N.H. Rev. Stat. Ann. § 205-A:4.

**Right to sell home in place.** Community owners can effectively prevent homeowners from selling their homes by reserving the right to reject any potential buyer as a resident. New Hampshire limits the community owners' ability to reject an application for residency so long as the applicant meets the rules of the community. . N.H. Rev. Stat. Ann. § 205-A:2.

**Relocation expenses.** New Hampshire does not have a program to compensate homeowners for any part of the cost of moving homes if a manufactured home community closes.

**Administrative complaint procedure.** Some states offer a simple administrative procedure for resolving residents' complaints about their manufactured home community. New Hampshire created a Board of Manufactured Housing to allow homeowners a venue for challenging the unreasonable application of park rules to them. N.H. Rev. Stat. Ann. § 205-A:27.

**Requirement of lease of at least one year.** About twenty states require the owner of a manufactured home community to offer homeowners leases of at least a year. New Hampshire has no such requirement.

**Requirement that community owner maintain the community.** New Hampshire requires manufactured home community owners to maintain common areas, roads, utility and other services in a safe and good working order: N.H. Rev. Stat. Ann. § 205- A:13-c. State law also specifically gives residents the right to petition a court to issue an injunction, authorize rent withholding, or appoint a receiver if a community owner does not comply with these requirements. N.H. Rev. Stat. Ann. §§ 205- A:15 to 205-A:20.

**Resident ability to enforce the laws.** In New Hampshire, residents have the right to enforce the state's manufactured home community protections through the state's consumer protection law. N.H.Rev. Stat. Ann. § 205-A:13-a. The state's manufactured housing laws also provide for a \$500 civil penalty if a manufactured home community owner violates the law. N.H. Rev. Stat § 205-A:12-a.

36,077

# Homesites in  
Communities

Approximately

450

# of Communities

123

# of Resident Owned  
Communities

6,957

# of Homes in Resident  
Owned Communities

## TITLING: RIGHT TO TREAT HOME AS REAL PROPERTY



The way in which a state governs the titling of manufactured homes, especially when homes may be converted from personal property to real property, has major implications for owners and purchasers. Although a modern manufactured home may be indistinguishable from a site-built home to many observers, it is typically considered personal property, like a car or a television set, rather than real property, absent some sort of conversion to real property. This classification as personal property, along with other issues common to manufactured housing, often keeps homeowners from enjoying the same security and potential for wealth creation enjoyed by owners of site-built homes. In New

Hampshire, if a manufactured home is placed on land owned by the homeowner, it becomes part of the real property when it has been affixed and attached to the land and may be financed along with the land. When a home is placed upon land owned by someone else, it is classified as real property once it is connected to utilities. This means that transfer of ownership and recording and perfection of liens is conducted as with other real property and enables homeowners to obtain mortgage loans rather than chattel loans. Security interests in these homes may also be created and perfected pursuant to New Hampshire's version of the Uniform Commercial Code, but this is seldom used. N.H. Rev. Stat. Ann. § 477:44

## STATE POLICIES AND PROGRAMS THAT AFFECT **NONPROFIT MANUFACTURED HOUSING DEVELOPMENT AND PRESERVATION**

### LICENSING ISSUES FOR NONPROFIT MANUFACTURED HOUSING DEVELOPERS

Licensure and regulation of manufactured home dealers is almost exclusively a state function. However, in New Hampshire no special license is required to sell or deal in manufactured homes.

### STATE WEATHERIZATION PROGRAMS & OTHER MANUFACTURED HOUSING REPAIR OR REPLACEMENT PROGRAMS

In New Hampshire, the Office of Energy and Planning oversees the state's Weatherization Assistance Program (WAP). Low-income households in manufactured housing are eligible for WAP assistance in New Hampshire and participate in the program under the same rules and policies as residents of more traditional housing. Five Community Action Programs in administer the program in the state. From 2010 to 2013, a pilot project involving the New Hampshire Community Loan Fund installed efficiency upgrades to over 400 manufactured homes located in resident owned manufactured home communities (ROCs), primarily in the Belknap-Merrimack County Community Action Agency's service area.

### PUBLIC FINANCING

Consumers and nonprofit organizations have long benefitted from New Hampshire's leadership on manufactured housing financing. The New Hampshire Community Loan Fund pioneered many of the financing structures residents use to purchase communities from landowners. ROC USA®, a nonprofit organization which helps residents purchase their communities from private owners, is leveraging the financial innovations and expertise developed in New Hampshire to help homeowners nationwide convert their communities to resident-owned communities. Nonprofits and public agencies have also successfully accessed state and federal funds to help resident-owned communities upgrade infrastructure or make other needed improvements to the community. Individuals can also access affordable mortgages through the New Hampshire Housing Finance Agency or receive direct assistance to purchase homes.

## LOCAL AND MUNICIPAL **MANUFACTURED HOUSING POLICY**

### LOCAL ZONING

New Hampshire law prohibits municipalities from completely excluding manufactured homes from areas zoned for residential housing. It does not, however, require municipalities to allow manufactured home communities. N.H. Rev. Stat. Ann. § 674:32.

### MORATORIUMS ON REDEVELOPMENT OF MANUFACTURED HOUSING COMMUNITIES

New Hampshire allows municipalities to adopt interim zoning ordinances supporting a moratorium or limitation on the issuance of building permits or the grant of subdivision or site plan approval. The interim ordinance may last for up to one year. N.H. Rev. Stat. Ann. § 674:23. This authority can be used to place a temporary hold on redevelopment of manufactured housing communities.

### LOCAL TAX & OTHER FINANCIAL INCENTIVES

Local jurisdictions in New Hampshire that have not adopted tax or other financial incentives which would specifically encourage landowners to sell or transfer the community to residents.

## LOCAL RENT CONTROL

A decision by the state's highest court denies a local municipality the authority to adopt rent control ordinances. *Girard v. Town of Allentown*, 428 A.2d 488 (N.H. 1981).

## MANUFACTURED HOUSING INCLUSION IN CONSOLIDATED PLANNING, MUNICIPAL PLANNING AND COMPREHENSIVE PLANNING

The policies that guide the development and preservation of affordable housing in New Hampshire—including manufactured housing—are developed on the state and local level. These policies and goals are articulated in planning documents which outline use of the land and funding resources. The state's 2016 consolidated plan notes that funding for manufactured home communities' infrastructure, especially water and wastewater, is a priority, and that the state "often partners with the New Hampshire Community Loan Fund to help residents purchase and improve of formerly investor owned mobile home parks."<sup>1</sup> The state's 2017 action plan also lists infrastructure improvement in manufactured home cooperatives as one of its goals.<sup>2</sup>

## SURVEY OF SELECTED COUNTIES

This section of this survey reviews policies affecting manufactured homes in three New Hampshire Counties: Rockingham, Merrimack, and Strafford. Since much of the local manufactured home policy is formulated at the town level rather than the county level, this survey reviews not only county policies but also the policies in selected towns and cities—ones with relatively high concentrations of manufactured homes—within the three counties.

## ROCKINGHAM COUNTY

### COUNTY OVERVIEW

According to the Rockingham County Profile, published by the New Hampshire Employment Security agency, there are roughly over seven thousand manufactured housing units within the county, which constitutes over 5% of its total housing.<sup>3</sup> The Rockingham Planning Commission's Master Plan, updated in 2015,<sup>4</sup> mentions manufactured housing only briefly in the housing chapter, stating that "residents view safe and affordable housing as another important priority for investing public dollars. The development of single family housing and assisted living facilities were particularly favorable to residents while development of manufactured housing and apartments were the least favorable."<sup>5</sup>

### TOWN OF EXETER

Exeter is a town of about 14,000 in Rockingham County near the Massachusetts border. It was the county seat until 1997.

Exeter's Master Plan<sup>6</sup> documents Exeter's high proportion of the county's manufactured homes.<sup>7</sup> As of 2007, the town had 1061 manufactured homes, making up 16% of its housing units. This figure was slightly down from 1990, when there were 1100 manufactured homes, which made up 21% of the town's housing units. The plan notes that land area reserved for mobile homes and manufactured housing is extremely limited. Due to the high price of land in the area, the town does not anticipate further growth in the number of manufactured homes. One of the goals listed in the plan is to "support efforts by residents of manufactured housing parks to acquire and cooperatively own their parks if and when they are offered for sale."<sup>8</sup>

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1 State of New Hampshire, 2016-2020 Consolidated Plan, <http://www.nhhfa.org/assets/pdf/2016conplan.pdf>, p. 97.

2 Draft New Hampshire 2017 Action Plan, [http://www.nhhfa.org/assets/pdf/Action\\_Plan\\_2017\\_draft.pdf](http://www.nhhfa.org/assets/pdf/Action_Plan_2017_draft.pdf), p. 42.

3 <http://www.nhes.nh.gov/elmi/products/cp/documents/rockingham-cp.pdf>

4 <http://www.rpc-nh.org/application/files/5414/6168/4994/Complete2015RegionalMasterPlan.pdf>

5 [http://www.rpc-nh.org/application/files/6014/6100/8417/6\\_RMPHousing.pdf](http://www.rpc-nh.org/application/files/6014/6100/8417/6_RMPHousing.pdf)

6 <http://exeternh.gov/planning/master-plan>

7 [http://exeternh.gov/sites/default/files/fileattachments/planning/page/10161/master\\_plan\\_chapter\\_2\\_-\\_new\\_-\\_1-26-11.pdf](http://exeternh.gov/sites/default/files/fileattachments/planning/page/10161/master_plan_chapter_2_-_new_-_1-26-11.pdf)

8 [http://exeternh.gov/sites/default/files/fileattachments/planning/page/10161/master\\_plan\\_chapter\\_2\\_-\\_new\\_-\\_1-26-11.pdf](http://exeternh.gov/sites/default/files/fileattachments/planning/page/10161/master_plan_chapter_2_-_new_-_1-26-11.pdf), p. H-8.

## Zoning

Under Exeter's zoning ordinances, last amended in March 2016,<sup>9</sup> "one family detached dwellings" are permitted uses in zones R1, R2, R3, and R4. This term appears to include manufactured homes, since they are described as "dwellings" in the definitions section.<sup>10</sup> Manufactured home subdivisions are also specifically allowed in the R-1 district. However, the zoning ordinances specifically exclude manufactured homes from the RU (Rural) zone.

An interesting feature of the town's zoning ordinances is that they establish a "manufactured home park" district and a "manufactured home subdivision" district in which manufactured homes are the only permitted use without a special exception. This zoning structure is a way to preserve manufactured home communities, because it means that the property cannot be converted to another use without a zoning change.

The town's ordinances also specify requirements for manufactured home communities, including minimum lot size, setbacks, drainage, utilities, paved streets, open space, and lighting.<sup>11</sup> They also include special requirements for elevating and anchoring manufactured homes in flood hazard areas.<sup>12</sup>

## TOWN OF SEABROOK

Seabrook is a town of about 8500 in Rockingham County. It is located on the New Hampshire coast, on the border with Massachusetts.

The town's 2011-20 Master Plan<sup>13</sup> makes note of its balanced housing stock, estimating that 41% of its housing stock in 2007 was single family, 35% was multi-family, and 24% was manufactured housing. However, the document notes, "as a percentage, single family housing has increased slightly and manufactured homes have decreased slightly compared to 2007." In its Summary and Observations section, the plan states, "although most of Seabrook's housing stock is single family (40%) there is a significant amount of multi-family and manufactured homes. Numerous mobile home parks and apartment complexes were built in the 1970's." Objective H-1 in its Action Plan calls for the continuation of allowing "manufactured housing on single lots throughout town." The plan's Land Use-Future Land Use section (chapter 3)<sup>14</sup> mentions manufactured housing only briefly, noting that mobile homes are not permitted in the Rural (I) or Beach Residential (B1) Districts.

The town's zoning ordinance,<sup>15</sup> which was last updated in March 2017, appears to treat manufactured homes as single-family dwellings, so they are allowed in any zoning district where single-family dwellings are allowed.<sup>16</sup> It does not allow manufactured home communities in any part of the town, however.<sup>17</sup> The ordinance also includes special requirements for elevating and anchoring manufactured homes in flood hazard areas.<sup>18</sup>

## MERRIMACK COUNTY

### COUNTY OVERVIEW

There are 3930 mobile housing units in Merrimack County.<sup>19</sup> The 2015 Master Plan prepared by the Central New Hampshire Planning Commission, which serves Merrimack and Hillsborough Counties, notes that "isolation can be a problem for some living in mobile home parks, especially seniors due to: 1) fixed incomes; 2) transportation issues (driving). Obtaining services and groceries are often a challenge."<sup>20</sup> The plan also notes that the number of building permits in the region for single family, multifamily, and manufactured housing has decreased significantly since 2000. It particularly points out the towns of Bow, Henniker, and Pittsfield, which are all located in Merrimack

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<sup>9</sup> [http://exeternh.gov/sites/default/files/fileattachments/building/page/13081/2016\\_final.pdf](http://exeternh.gov/sites/default/files/fileattachments/building/page/13081/2016_final.pdf). See also Zoning Map of the Town of Exeter (2013), [http://exeternh.gov/sites/default/files/fileattachments/building/page/9191/2013\\_zoning\\_map\\_7.pdf](http://exeternh.gov/sites/default/files/fileattachments/building/page/9191/2013_zoning_map_7.pdf)

<sup>10</sup> § 2.2.50 ("designed to be used as a dwelling...").

<sup>11</sup> § 6.9.

<sup>12</sup> § 9.4.8.

<sup>13</sup> <http://seabrooknh.info/boards-and-committees/planning-board/seabrook-master-plan/>

<sup>14</sup> <http://www.seabrooknh.info/wp-content/uploads/1-FINAL-Population-Housing-12-6-11.pdf>

<sup>15</sup> <http://seabrooknh.info/wp-content/uploads/2015/03/Zoning-Ordinance-dated-14-March-2017.pdf>

<sup>16</sup> Seabrook zoning ordinance, pp. Z-6 (defining "dwelling building," Z-7 (defining "dwelling unit"), and Z-13 (defining "mobile home" as a type of dwelling unit).

<sup>17</sup> Seabrook zoning ordinance, p. Z-32, § 11.100 ("no mobile home park or house trailer park shall be established, or be allowed to expand if already established, within the confines of the town").

<sup>18</sup> Seabrook zoning ordinance, p. Z-67, § 24.220.

<sup>19</sup> <http://www.nhes.nh.gov/elmi/products/cp/documents/merrimack-cp.pdf>

<sup>20</sup> <http://cnhrpc.org/wp-content/uploads/2016/04/CNHRPC-Chapter-4-Housing-FINAL-4-11-16.pdf>

County.<sup>21</sup> The plan also states “there is an aging housing stock that poses challenges to municipalities and residents looking for affordable places to live, including large old mansions no longer used as single family housing, aging manufactured housing units, and aging subsidized housing buildings.”<sup>22</sup>

## TOWN OF ALLENTOWN

The Town of Allentown has a population of a little over 4000 and is located in the southern part of Merrimack County. Half of the town’s land is in Bear Brook State Park. Allentown suffered a severe flood in 2006.

Allentown’s 2016 Master Plan<sup>23</sup> notes that there are several manufactured home communities within the town.<sup>24</sup> 396 of the town’s 1881 dwelling units (21%) are manufactured units,<sup>25</sup> a higher percentage than in neighboring towns. However, manufactured housing in the town decreased by nearly 50% between 2000 and 2010, due to “post-flood buyout that took place approximately in 2009.”<sup>26</sup> The town experienced an 11% decline in overall population over the same ten year period, and the total number of housing units decreased by over ten percent.<sup>27</sup>

Under Allentown’s zoning ordinance,<sup>28</sup> single manufactured homes are allowed everywhere that site-built single family homes are allowed.<sup>29</sup> However, manufactured home communities are allowed only in the town’s Manufactured Housing Park Overlay District, created in March 2015, and must be approved as a conditional use.<sup>30</sup> The overlay district was intended to “provide standards and incentives for manufactured home parks while at the same time ensuring a balance of housing types throughout town.”<sup>31</sup> The overlay district is located entirely within the Open Space Farming Zone (OSF), and is made up of 726 acres accounting for 5.8% of the town’s land area. The zoning ordinance requires approval of a manufactured home community’s site plan, and sets standards regarding such matters as lot size, density, open space, setbacks, drainage, parking areas, and internal roadways.<sup>32</sup> The ordinance also includes special rules regarding elevation and anchoring of manufactured homes in floodplains.<sup>33</sup>

## STRAFFORD COUNTY

### COUNTY OVERVIEW

According to a 2015 county profile published by a state agency, there are 5015 mobile home units in Strafford County.<sup>34</sup> While the county’s master plan, adopted by the Strafford Regional Planning Commission in 2015, does not include information about mobile or manufactured housing,<sup>35</sup> its Regional Housing Needs Appendix<sup>36</sup> notes that there are about 900 units in the region located within cooperative manufactured housing communities. Of these, two-thirds are located in urban communities and one-third in suburban and rural towns. The appendix also notes that in the 1990s, mobile homes and manufactured housing units constituted nearly 22% of authorized building permits.

### CITY OF ROCHESTER

The City of Rochester is has a population of almost 30,000. Its 2015 Consolidated Action Plan<sup>37</sup> states that manufactured housing/ mobile homes make up nearly 20% of the city’s housing units (~2,339) and eight manufactured home communities.<sup>38</sup> A large number of those

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23 Allentown Master Plan, [http://www.allentownnh.gov/sites/allentownnh/files/uploads/2016\\_master\\_plan\\_combined.pdf](http://www.allentownnh.gov/sites/allentownnh/files/uploads/2016_master_plan_combined.pdf).

24 Allentown master plan p. 26.

25 Allentown master plan p. 22.

26 Allentown master plan p. 22.

27 Allentown master plan pp. 21-22.

28 Allentown zoning ordinance, [http://www.allentownnh.gov/sites/allentownnh/files/uploads/allentown\\_zoning\\_ordinance\\_2017\\_final\\_draft.pdf](http://www.allentownnh.gov/sites/allentownnh/files/uploads/allentown_zoning_ordinance_2017_final_draft.pdf).

29 Allentown zoning ordinance §§ 602, 1702, [http://www.allentownnh.gov/sites/allentownnh/files/uploads/allentown\\_zoning\\_ordinance\\_2017\\_final\\_draft.pdf](http://www.allentownnh.gov/sites/allentownnh/files/uploads/allentown_zoning_ordinance_2017_final_draft.pdf); Allentown master plan p. 14. 30

Allentown zoning ordinance § 1702.

31 Allentown master plan p. 11.

32 Allentown zoning ordinance § 1703.

33 Allentown zoning ordinance Art. XII.

34 <http://www.nhes.nh.gov/elmi/products/cp/documents/strafford-cp.pdf>

35 [http://strafford.org/cmsAdmin/uploads/localsolutionsforthestraffordregion\\_1-30-15\\_final.pdf](http://strafford.org/cmsAdmin/uploads/localsolutionsforthestraffordregion_1-30-15_final.pdf)

36 [http://strafford.org/cmsAdmin/uploads/hna-full-draft-bcmedit13jan2015\\_finalforupload.pdf](http://strafford.org/cmsAdmin/uploads/hna-full-draft-bcmedit13jan2015_finalforupload.pdf)

37 [http://www.rochesternh.net/sites/rochesternh/files/file/file/final\\_-\\_fy\\_2015-2020\\_consolidated\\_plan\\_-\\_website\\_version\\_0.pdf](http://www.rochesternh.net/sites/rochesternh/files/file/file/final_-_fy_2015-2020_consolidated_plan_-_website_version_0.pdf)

38 Rochester Action Plan pp. 38, 43.

who live in manufactured housing tend to be elderly residents.<sup>39</sup> The plan states that most of these homes lack appropriate weatherization, resulting in high utility bills for homeowners. Weatherization and heating needs for manufactured housing are described as “a large area of concern.”<sup>40</sup> The Barriers to Affordable Housing section of the plan states: “Manufactured homes are often less energy-efficient than other housing, and there is a higher concentration of low-income residents in manufactured home parks. High heating costs during the region’s bitterly cold winter months often make these homes unaffordable for their low-income owners.”<sup>41</sup>

The plan notes, “funding will be provided for accessibility-related upgrades and weatherization work that will benefit low to moderate income homeowners, many of whom own manufactured homes, who would otherwise be unable to make such necessary improvements to their homes.”<sup>42</sup> It notes that a large number of the homes weatherized by the local community action agency are manufactured homes, “as manufactured homes are disproportionately owned by low-income residents and can be weatherized in a very cost-efficient way.”<sup>43</sup>

The city’s Master Plan, last updated in 2003, notes that between 1970 and 1980, “over 600 mobile homes were added to the housing stock,” most of which were added to mobile home parks located on the outskirts of more developed areas of the city.<sup>44</sup>

The plan also states that based on a community survey, “citizens support developing single family over other residential forms. Mobile home parks, boarding houses, and mobile homes on individual lots are relatively unpopular among the citizens.”<sup>45</sup>

The city’s zoning ordinances allow manufactured homes only i) on individual lots in the Agricultural zoning district (AG); ii) within manufactured housing subdivisions, located in the AG zoning district; and iii) within established mobile home parks on approved pads/lots.<sup>46</sup> Homes be at least 23 feet in overall width and have at least 700 square feet of habitable living space.<sup>47</sup> The city has special rules for elevation and anchoring of manufactured homes in flood hazard districts, and prohibits manufactured housing in floodways except in existing mobile homes parks.<sup>48</sup> The city also has an ordinance regulating manufactured home communities that sets standards for such matters as density, setbacks, screening, landscaping, skirting, fuel storage, fire protection, garbage disposal, control of pets, minimum lot size, parking, common areas, water supply, sewage disposal, utilities, and licensing.<sup>49</sup>

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39 [http://www.rochesternh.net/sites/rochesternh/files/file/file/cdbg\\_aap\\_fy\\_2016-2017\\_final\\_web\\_version.pdf](http://www.rochesternh.net/sites/rochesternh/files/file/file/cdbg_aap_fy_2016-2017_final_web_version.pdf)

40 Rochester action plan p. 43.

41 Rochester action plan p. 38.

42 Rochester action plan p. 111.

43 Rochester action plan p. 69.

44 Master Plan for Rochester, [http://www.rochesternh.net/sites/rochesternh/files/file/file/land\\_use.pdf](http://www.rochesternh.net/sites/rochesternh/files/file/file/land_use.pdf), p. 6.

45 Rochester master plan, p. 29.

46 Rochester Zoning Ordinance, <http://www.ecode360.com/attachment/RO2619/RO2619-042.pdf>, § 42.20(b)(10).

47 *Id.*

48 Rochester Zoning Ordinance, § 42.13(d)(3), (e)(2)(C).

49 City of Rochester, Mobile Home Park Ordinance, [http://www.rochesternh.net/sites/rochesternh/files/file/file/chapter\\_43\\_3.pdf](http://www.rochesternh.net/sites/rochesternh/files/file/file/chapter_43_3.pdf).



Innovations in Manufactured Homes (I'M HOME) is a national initiative managed by Prosperity Now which seeks to ensure that owners of manufactured homes have the opportunity to build wealth through homeownership by improving the quality of new and replacement development, enhancing homeowners' ability to enjoy long-term land security, expanding access to safe home financing and encouraging a supportive policy environment.