

# MANUFACTURED HOMES COMMISSION

Minutes of Special Meeting Held on February 17, 2025  
Virtual Participation

## CALL TO ORDER: 10:04 am

**In Attendance:** Ethan Mascoop, Chair; Dan Less, Attorney General's Office ("AGO"), Secretary; Sandra Overlock, Paula Fay; and Tyler Newhall, Executive Office of Housing and Livable Communities ("EOHLC") / **Absent:** Jeffrey Hallahan, Vice-Chair / **Vacancy:** One

It was generally agreed there was a quorum present.

## EOHLC Proposed Regulation for MBTA Community Law:

- Mr. Mascoop called this special meeting pursuant Manufactured Homes Commission By-Law Article 9.
- He reminded members that at the January 14, 2024 meeting, the Commission was informed that EOHLC would be issuing emergency regulations regarding the MBTA Communities law and that there would be a public comment period about the regulations before the next meeting in April. At that time members discussed the possibility of holding a special meeting before April to consider making comments to the proposed regulations.
- Mr. Mascoop informed the members that EOHLC had issued proposed 760 CMR 72.00: Multi-Family Zoning Requirement for MBTA Communities and, therefore, the purpose of this special meeting was whether the Commission would submit written comments. The public comment period closed on February 21, 2025. A copy of the regulations is attached.
- Mr. Mascoop shared his proposed comments which related to manufactured housing communities ("MHC") located in municipalities designated as "MBTA Communities" pursuant to G.L. c 40A, §3A. The proposed comments addressed situations in which MHC owners seek to discontinue their MHCs located in MBTA Communities. The proposed comments requested EOHLC include the following provisions:
  - Owners of MHCs located in MBTA Communities provide notice to the AGO, EOHLC, and the Commission when they discontinue their MHCs;
  - Add MHCs to the definition of "Excluded Land" so that MHCs cannot be included in a proposed zoning district; and/or
  - An approved zoning district must require a buffer of at least 0.2 miles from an MHC.
- Mr. Mascoop explained the purpose for the proposed comment:
  - He reminded the members of the discontinuance of Lee's Trailer Park in Revere. The owner of that MHC notified residents that they were discontinuing the MHC in or about September 2021 which, under G.L. c. 140, §32L(7A) gave the owner two years to either purchase the residents' homes or pay the residents for their moving expenses. By the fall of 2022, nearly all of the residents had been removed and there were allegations that the owner was using aggressive tactics to have the residents accept their compensation offers.
  - The AGO did not become aware of the discontinuance or these complaints of aggressive tactics until the late fall of 2022. As most of the residents had already moved out, there was little for the AGO to do except monitor the situation to ensure the remaining residents were treated properly.

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- Under G.L. c. 140, §32L(7A)-(9), MHC owners are not required to notify the AGO that they intend to discontinue their MHCs. Consequently, in the case of Lee's, the AGO did not become aware of the discontinuance until too late in the process.
  - Lee's was likely discontinued because Revere is an MBTA Community. It appeared the owner discontinued it to take advantage of incentives under the MBTA law to build multi-unit housing that would be more profitable than the MHC.
  - Other MHCs in other MBTA communities could similarly be targeted for discontinuance. Given that owners do not need to notify the AGO that they are discontinuing their communities, another situation like Lee's could happen again and should be prevented.
  - If added to the EOHLC regulations, the proposed comments would prevent another situation like Lee's by requiring owners who have MHCs in MBTA Communities to notify the AGO and others when they are discontinuing their communities and/or simply prohibit discontinuances in the communities
- Mr. Newhall provided further explanation about the MBTA Community law and shared a map of the impacted communities. A copy of that map is attached.
  - Members discussed the proposed comment and there was concern about how the first proposed recommendation in the comment was worded. Consequently, Mr. Less made the following motion:

The Commission authorizes Mr. Mascoop to make any grammatical changes he sees fit and to change the first bulleted item on page 1 of the comment and item enumerated as "1." on page 3 to state "Add to the regulation 'An owner of any Manufactured Home Park, located within any of the 177 communities covered by the MBTA law, must provide simultaneous copies to the Attorney General's Office, Executive Office of Housing and Livable Communities, and the Manufactured Homes Commission of any notice the owner sends to the tenants of the park informing them that the owner intends sell, close, or discontinue the park. Such owner shall also give simultaneous notice to the board of health or rent board for the city or town in which their Manufactured Home Park is located.'"

Mr. Mascoop seconded the motion and it was approved unanimously.

Mr. Mascoop then moved to submit the comment to EOHLC. Ms. Overlook second the motion. Mr. Mascoop, Ms. Fay, and Ms. Overlook voted in favor of the motion. Mr. Less abstained. Mr. Tyler had left the meeting by the time the vote was taken.

A copy of the comment sent to EOHLC is attached.

**ADJOURNED - At 11:34, Mr. Mascoop made a motion to adjourn. Mr. Fay seconded the motion and it was approved unanimously**

**Meeting adjourned at 11:35 p.m.**

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Pursuant to the Massachusetts Open Meeting Law, G.L. c. 30A, §§ 18-25, notice is hereby given of a meeting of the MANUFACTURED HOMES COMMISSION. Massachusetts General Laws, Chapter 6, Section 108, establishes the Manufactured Homes Commission. It is the mission of the Manufactured Homes Commission to provide prompt, impartial service to all parties affected by or concerned with matters pertaining to manufactured housing communities, to the maximum extent permitted by law.

## **NOTICE OF MANUFACTURED HOMES COMMISSION SPECIAL MEETING**

10:00 AM – 11:30 AM Monday, February 17, 2025

To attend this virtual meeting via [Teams](#), please click on the following link:

**[JOIN THE MEETING](#)**

**Meeting ID:** 228 086 758 61

**Passcode:** ML6ZQ6Dz

OR dial in by phone:

857-327-9245

If outside of New England, click here to [find a local number](#)

When prompted, enter the following phone conference ID: 576 673 386#.

### **AGENDA**

#### **CALL TO ORDER**

- Attendance and Introductions

#### **ADMINISTRATIVE MATTERS**

#### **NEW BUSINESS**

- Discuss Executive Office of Housing and Livable Communities Proposed Regulation 760 CMR 72.00 – Multifamily Zoning Requirement for MBTA Communities

#### **PUBLIC FORUM**

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*This meeting is open to the public. All persons having business to be brought before the Commission are invited to participate.*

#### **Commission Members:**

**Ethan Mascoop, Chair**  
**Jeffrey Hallahan, Vice-Chair**  
**Paula Fay, Commissioner**

**Sandy Overlock, Commissioner**  
**Daniel Less, Ex Officio**  
**Tyler Newhall, Ex Officio**

**For further information contact:** Oliver L. Stark, Counsel  
Executive Office of Housing & Livable Communities  
[oliver.l.stark@mass.gov](mailto:oliver.l.stark@mass.gov)  
617-573-1521

For reasonable accommodations regarding this meeting, please contact 617-573-1102.

Please contact the Massachusetts Executive office of Housing and Livable Communities at (617) 573-1100 for free language assistance.

Favor de comunicarse con la Oficina Ejecutiva de Vivienda y Comunidades Habitables (Executive Office of Housing and Livable Communities (EOHLC)) de Massachusetts en (617) 573-1100 para ayuda gratis con el idioma.

Entre em contato com o Escritório Executivo de Habitação e Comunidades Habitáveis (Executive Office of Housing and Livable Communities (EOHLC)) de Massachusetts no número (617) 573-1100 para obter assistência gratuita com o idioma.

Tanpri kontakte Biwo Lojman ak Kominote alimantè (Executive Office of Housing and Livable Communities (EOHLC)) Masachousèt la nan (617) 573-1100 pou asistans gratis nan lang.

如果您需要免费的语言翻译帮助，请联络麻州住宅及社区发展部 马萨诸塞州住房和宜居社区执行办公室 (The Massachusetts Executive Office of Housing and Livable Communities (EOHLC)), 联络方式(617) 573-1100。

Свяжитесь с сотрудником Исполнительное управление жилищного строительства и пригодных для жизни сообществ (Executive Office of Housing and Livable Communities (EOHLC)) Массачусетс на предмет оказания бесплатной помощи по переводу на иностранный язык. ((617) 573-1100)

សូមទំនាក់ទំនងជាមួយអគ្គនាយកដ្ឋានសហគមន៍និងលំនៅឋានរដ្ឋម៉ាសាឈូសេត រង្វង់ប្រតិបត្តិការសហគមន៍និងលំនៅឋាន។ (Massachusetts Executive Office of Housing and Livable Communities (EOHLC)) មរយៈ (617) 573-1100 ដើម្បីទទួលបានជំនួយ ផកយតតតិកែថា។

Vui lòng liên Văn phòng điều hành về nhà ở và cộng đồng đáng sống (Executive Office of Housing and Livable Communities (EOHLC)) Massachusetts tại (617) 573-1100 để được hỗ trợ ngôn ngữ miễn phí.

On February 11, 2025, this notice was posted online to the EOHLC Open Meeting Notices and the Manufactured Homes Commission websites:

- <https://www.mass.gov/info-details/eohlc-open-meeting-notices>
- <https://www.mass.gov/info-details/manufactured-homes-commission>

## 760 CMR 72.00 MULTI-FAMILY ZONING REQUIREMENT FOR MBTA COMMUNITIES

- 72.01: Background and Purpose
- 72.02: Definitions
- 72.03: General Principles of Compliance
- 72.04: Allowing Multi-Family As of Right
- 72.05: Determining Reasonable Size
- 72.06: Minimum Gross Density
- 72.07: Determining Suitability for Families with Children
- 72.08: Location of Districts
- 72.09: Determinations of Compliance
- 72.10: Ongoing Obligations; Rescission of a Determination of Compliance
- 72.11: Changes to MBTA Service

### 72.01: Background and Purpose

G.L. c 40A, §3A provides: An MBTA community shall have a zoning ordinance or by-law that provides for at least 1 district of reasonable size in which multi-family housing is permitted as of right; provided, however, that such multi-family housing shall be without age restrictions and shall be suitable for families with children. For the purposes of this section, a district of reasonable size shall: (i) have a minimum gross density of 15 units per acre, subject to any further limitations imposed by section 40 of chapter 131 and title 5 of the state environmental code established pursuant to section 13 of chapter 21A; and (ii) be located not more than 0.5 miles from a commuter rail station, subway station, ferry terminal or bus station, if applicable.

The purpose of G.L. c. 40A, § 3A is to encourage the production of Multi-family housing by requiring MBTA communities to adopt zoning districts where Multi-family housing is allowed As of right, and that meet other requirements set forth in the statute. 760 CMR 72.00 establishes rules, standards, and procedures to set forth how MBTA communities may achieve compliance with G.L. c. 40A, §3A. Pursuant to G.L. c. 40A, § 3A(c), the Executive Office of Housing and Livable Communities (EOHLC) is the regulatory agency for the program and is expressly authorized to issue guidelines, in consultation with the Executive Office of Economic Development, the Massachusetts Bay Transportation Authority and the Massachusetts Department of Transportation, to determine if an MBTA community is in compliance with G.L. c. 40A, § 3A. EOHLC is adopting these regulations pursuant to its authority under G.L. c. 6A, §16G ½ and pursuant to the Decision issued by the Supreme Judicial Court in Attorney General v. Town of Milton, et al. SJC-13580, slip op. (Jan. 8, 2025), holding that the guidelines issued by EOHLC on August 17, 2023 are unenforceable and must be promulgated in accordance with G.L. c. 30A, § 3.

### 72.02: Definitions

“Adjacent community” means an MBTA community that (i) has within its boundaries less than 100 acres of Developable station area, and (ii) is not an Adjacent small town.

“Adjacent small town” means an MBTA community that (i) has within its boundaries less than 100 acres of Developable station area, and (ii) either has a population density of less than 500 persons per square mile, or a population of not more than 7,000 year-round residents as determined in the most recently published United States Decennial Census of Population and Housing.

“Affordable unit” means a Multi-family housing unit that is subject to a restriction in its chain of title limiting the sale price or rent, or limiting occupancy to an individual or household of a specified income, or both. Affordable units may be, but are not required to be, eligible for inclusion on EOHLC’s Subsidized Housing Inventory. Nothing in 760 CMR 72.00 changes the Subsidized Housing Inventory eligibility criteria, and no affordable unit shall be counted on the Subsidized Housing Inventory unless it satisfies the requirements for inclusion under 760 CMR 56.03(2) or any other regulation or guidance issued by EOHLC.

“Age-restricted housing” means any housing unit encumbered by a title restriction requiring a minimum age for some or all occupants.

“As of right” means development that may proceed under a zoning ordinance or by-law without the need for a special permit, variance, zoning amendment, waiver, or other discretionary zoning approval.

“Bus station” means a location with a passenger platform and other fixed infrastructure serving as a point of embarkation for the Massachusetts Bay Transportation Authority Silver Line. Upon the request of an MBTA community, EOHLC, in consultation with the Massachusetts Bay Transportation Authority, may determine that other locations qualify as a bus station if (i) such location has a sheltered platform or other fixed infrastructure serving a point of embarkation for a high-capacity Massachusetts Bay Transportation Authority bus line, and (ii) the area around such fixed infrastructure is highly suitable for Multi-family housing.

“Commuter rail community” means an MBTA community that (i) does not meet the criteria for a Rapid transit community, and (ii) has within its borders at least 100 acres of Developable station area associated with one or more Commuter rail stations.

“Commuter rail station” means any Massachusetts Bay Transportation Authority Commuter rail station with year-round, rather than intermittent, seasonal, or event-based, service, including stations and any extensions to such lines under construction and scheduled to begin service before the end of 2025.

“Compliance model” means the model created by EOHLC to determine compliance with G.L. c. 40A, § 3A’s reasonable size, gross density, and location requirements. The compliance model is described in further detail in the Compliance Methodology Model, which is a model prescribed by EOHLC.

“Determination of compliance” means a determination made by EOHLC as to whether an MBTA community has a Multi-family zoning district that complies with the requirements of G.L. c. 40A, § 3A. A Determination of compliance may be a determination of interim compliance or a determination of district compliance, as described in 760 CMR 72.09.

“Developable land” means land on which Multi-family housing can be permitted and constructed. For purposes of 760 CMR 72.00, Developable land consists of: (i) all privately-owned land except Lots or portions of Lots that meet the definition of Excluded land, and (ii) Developable public land.

“Developable public land” means any Publicly-owned land that (i) is used by a local housing authority; (ii) has been identified as a site for housing development in a housing production plan approved by EOHLC; or (iii) has been designated by the public owner for disposition and redevelopment. Other Publicly-owned land may qualify as Developable public land if EOHLC determines, at the request of an MBTA community and after consultation with the public owner, that such land is the location of obsolete structures or uses, or otherwise is suitable for conversion to Multi-family housing, and will be converted to or made available for Multi-family housing within a reasonable period of time.

“Developable station area” means Developable land that is within 0.5 miles of a Transit station.

“EOED” means the Executive Office of Economic Development.

“EOHLC” means the Executive Office of Housing and Livable Communities.

“Excluded land” means land areas on which it is not possible or practical to construct Multi-family housing. For purposes of 760 CMR 72.00, Excluded land is defined by reference to the ownership, use codes, use restrictions, and hydrological characteristics in MassGIS and consists of the following:

- (1) All Publicly-owned land, except for Lots or portions of Lots determined to be Developable public land.
- (2) All rivers, streams, lakes, ponds and other surface waterbodies.
- (3) All wetland resource areas, together with a buffer zone around wetlands and waterbodies equivalent to the minimum setback required by title 5 of the state environmental code.
- (4) Protected open space and recreational land that is legally protected in perpetuity (for example, land owned by a local land trust or subject to a conservation restriction), or that is likely to remain undeveloped due to functional or traditional use (for example, cemeteries).
- (5) All Public rights-of-way and Private rights-of-way.
- (6) Privately-owned land on which development is prohibited to protect private or public water supplies, including, but not limited to, Zone I wellhead protection areas and Zone A surface water supply protection areas.
- (7) Privately-owned land used for educational or institutional uses such as a hospital, prison, electric, water, wastewater or other utility, museum, or private school, college or university.

“Ferry terminal” means the location where passengers embark and disembark from regular, year-round Massachusetts Bay Transportation Authority ferry service.

“Gross density” means a units-per-acre density measurement that includes land occupied by Public rights-of-way and any recreational, civic, commercial, and other nonresidential uses.

“Housing suitable for families” means housing comprised of residential dwelling units that are not age-restricted housing, and for which there are no zoning restriction on the number of bedrooms, the size of bedrooms, or the number of occupants.

“Listed funding sources” means (i) the Housing Choice Initiative as described by the governor in a message to the general court dated December 11, 2017; (ii) the Local Capital Projects Fund established in G.L. c. 29, § 2EEEE; and (iii) the MassWorks infrastructure program established in G.L. c. 23A, § 63.

“Lot” means an area of land with definite boundaries that is used or available for use as the site of a building or buildings.

“MassGIS data” means the comprehensive, statewide database of geospatial information and mapping functions maintained by the Commonwealth's Bureau of Geographic Information, within the Executive Office of Technology Services and Security, including the lot boundaries and use codes provided by municipalities.

“MBTA Community Categories and Requirements” means the table of MBTA communities adopted and updated by EOHLC, identifying the community category assignment, minimum land area, minimum Multi-family unit capacity, Developable station area, and percentage of the Multi-family zoning district to be located in the Developable station area, applicable to MBTA communities.

“MBTA community” means a city or town that is: (i) one of the 51 cities and towns as defined in G.L. c. 161A, § 1; (ii) one of the 14 cities and towns as defined in G.L. c. 161A, § 1; (iii) other served communities as defined in G.L. c. 161A, § 1; or (iv) a municipality that has been added to the Massachusetts Bay Transportation Authority under G.L. c. 161A, § 6 or in accordance with any special law relative to the area constituting the authority.

“Mixed-use development” means development containing a mix of residential uses and non-residential uses, including, without limitation, commercial, institutional, industrial or other uses.

“Mixed-use development zoning district” means a zoning district where multiple residential units are allowed as of right if, but only if, combined with non-residential uses, including, without limitation, commercial, institutional, industrial or other uses.

“Multi-family housing” means a building with three or more Residential dwelling units or two or more buildings on the same Lot with more than one Residential dwelling unit in each building.

“Multi-family unit capacity” means an estimate of the total number of Multi-family housing units that can be developed As of right within a Multi-family zoning district, made in accordance with the requirements of 760 CMR 72.05(1)(b).

“Multi-family zoning district” means a zoning district, including a base district or an overlay district, in which Multi-family housing is allowed As of right; provided that the district shall be in a fixed location or locations, and shown on a map that is part of the zoning ordinance or by-law.

“One Stop Application” means the single application portal for the Community One Stop for Growth through which (i) EOED considers requests for funding from the MassWorks infrastructure program; (ii) EOHLC considers requests for funding from the Housing Choice Initiative, (iii) EOED, EOHLC and other state agencies consider requests for funding from other discretionary grant programs.

“Private rights-of-way” means land area within which private streets, roads and other ways have been laid out and maintained, to the extent such land areas can be reasonably identified by examination of available tax parcel data.

“Publicly-owned land” means (i) any land owned by the United States or a federal agency or authority; (ii) any land owned by the Commonwealth of Massachusetts or a state agency or authority; and (iii) any land owned by a municipality or municipal board or authority.

“Public rights-of-way” means land area within which public streets, roads and other ways have been laid out and maintained, to the extent such land areas can be reasonably identified by examination of available tax parcel data.

“Rapid transit community” means an MBTA community that has within its borders at least 100 acres of Developable station area associated with one or more Subway stations, or Massachusetts Bay Transportation Authority Silver Line bus rapid transit stations.

“Residential dwelling unit” means a single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation.

“Sensitive land” means Developable land that, due to its soils, slope, hydrology, or other physical characteristics, has significant conservation values that could be impaired, or vulnerabilities that could be exacerbated, by the development of Multi-family housing. It also includes locations where Multi-family housing would be at increased risk of damage caused by flooding. Sensitive land includes, but is not limited to, wetland buffer zones extending beyond the title 5 setback area; land subject to flooding that is not a wetland resource area; priority habitat for rare or threatened species; Department of Environmental Protection-approved wellhead protection areas in which development may be restricted, but is not prohibited (Zone II and interim wellhead protection areas); and land areas with prime agricultural soils that are in active agricultural use.

“Site plan review” means a process established by local ordinance or by-law by which a local board reviews, and potentially imposes conditions on, the appearance and layout of a specific project prior to the issuance of a building permit.

“Subway station” means any of the stops along the Massachusetts Bay Transportation Authority Red Line, Green Line, Orange Line, or Blue Line, including but not limited to the Mattapan High Speed Line and any extensions to such lines.

“Transit station” means a Massachusetts Bay Transportation Authority Subway station, Commuter rail station, Ferry terminal or Bus station.

“Transit station area” means the land area within 0.5 miles of a Transit station.

#### 72.03: General Principles of Compliance

(1) 760 CMR 72.00 describes how an MBTA community can comply with the requirements of G.L. c. 40A, § 3A. 760 CMR 72.00 specifically addresses:

- (a) What it means to allow Multi-family housing “As of right.”
- (b) The metrics that determine if a Multi-family zoning district is “of reasonable size.”
- (c) How to determine if a Multi-family zoning district has a minimum gross density of 15 units per acre, subject to any further limitations imposed by G.L. c. 131, § 40 of and title 5 of the state environmental code.
- (d) The meaning of G.L. c. 40A, § 3A’s mandate that “such multi-family housing shall be without age restrictions and shall be suitable for families with children.”
- (e) The extent to which MBTA communities have flexibility to choose the location of a Multi-family zoning district.

(2) The following general principles have informed the more specific compliance criteria that follow:

- (a) MBTA communities with Subway stations, Commuter rail stations and other Transit stations benefit from having these assets located within their boundaries and should provide opportunity for Multi-family housing development around these assets. MBTA communities with no Transit stations within their boundaries benefit from proximity to Transit stations in nearby communities.
- (b) The Multi-family zoning districts required by G.L. c. 40A, § 3A should encourage the development of Multi-family housing projects of a scale, density and aesthetic that are compatible with existing surrounding uses, and minimize impacts to Sensitive land.
- (c) “Reasonable size” is a relative rather than an absolute determination. Because of the diversity of MBTA communities, a Multi-family zoning district that is “reasonable” in one city or town may not be reasonable in another city or town.
- (d) When possible, Multi-family zoning districts should be in areas that have safe, accessible, and convenient access to Transit stations for pedestrians and bicyclists.

#### 72.04: Allowing Multi-Family Housing “As of Right”

(1) To comply with G.L. c. 40A, § 3A, a Multi-family zoning district must allow Multi-family housing As of right, meaning that the construction and occupancy of multi-family housing is allowed in that district without the need for a special permit, variance, zoning amendment, waiver, or other discretionary approval. EOHLC will determine whether zoning provisions allow for Multi-family housing as of right consistent with the following requirements.

(a) Site plan review. G.L. c. 40A does not establish nor recognize site plan review as an independent method of regulating land use. However, the Massachusetts courts have recognized Site plan review as a permissible regulatory tool, including for uses that are permitted as of right. The court decisions establish that when Site plan review is required for a use permitted As of right, site plan review involves the regulation of a use and not its outright prohibition. The scope of review is therefore limited to imposing reasonable terms and conditions on the proposed use, consistent with applicable case law. 760 CMR 72.00 similarly recognizes that Site plan review may be required for Multi-family housing projects that are allowed As of right, within the parameters established by the applicable case law. Site plan approval may regulate matters such as vehicular access and circulation on a site, architectural design of a building, and screening of adjacent properties. Site plan review should not unreasonably delay a project nor impose conditions that make it infeasible or impractical to proceed with a project that is allowed As of right and complies with applicable dimensional regulations.

(b) Affordability requirements. G.L. c. 40A, § 3A does not include any express requirement or authorization for an MBTA community to require Affordable units in a Multi-family housing project that is allowed As of right. It is a common practice in many cities and towns to require Affordable units in a Multi-family project that requires a special permit, or as a condition for building at greater densities than the zoning otherwise would allow. These inclusionary zoning requirements serve the policy goal of increasing affordable housing production. If affordability requirements are excessive, however, they can make it economically infeasible to construct new Multi-family housing.

1. For purposes of making compliance determinations with G.L. c. 40A, § 3A, EOHLC will consider an affordability requirement to be consistent with As of right zoning as long as the zoning requires not more than ten percent of the units in a project to be Affordable units, and the cap on the income of families or individuals who are eligible to occupy the Affordable units is not less than eighty percent of area median income. Notwithstanding the foregoing, EOHLC may, in its discretion, approve a greater percentage of affordable units, or deeper affordability for some or all of the affordable units, in either of the following circumstances:

- a. The affordability requirements applicable in the Multi-family zoning district are reviewed and approved by EOHLC as part of a smart growth district under G.L. c. 40R, or under another zoning incentive program administered by EOHLC; or
- b. The affordability requirements applicable in the Multi-family zoning district are supported by an economic feasibility analysis, prepared for the municipality by a

qualified and independent third party acceptable to EOHLC, and using a methodology and format acceptable to EOHLC. The analysis must demonstrate that a reasonable variety of Multi-family housing types can be feasibly developed at the proposed affordability levels, taking into account the densities allowed As of right in the district, the dimensional requirements applicable within the district, and the minimum number of parking spaces required.

2. In no case will EOHLC approve alternative affordability requirements that require more than 20 percent of the units in a project to be Affordable units, except in a smart growth zoning district under G.L. c. 40R with a 25 percent affordability requirement approved and adopted prior to August 10, 2022 (the date of issuance by EOHLC of Compliance Guidelines for Multi-family Zoning Districts Under Section 3A of the Zoning Act which have been superseded by 760 CMR 72.00), including any such existing district that is expanded or amended to comply with G.L. c. 40A, § 3A and 760 CMR 72.00.

(c) Other requirements that do not apply uniformly in the Multi-family zoning district. Zoning will not be deemed compliant with G.L. c. 40A, § 3A's requirement that Multi-family housing be allowed As of right if the zoning imposes requirements on Multi-family housing that are not generally applicable to other uses. The following are examples of requirements that would be deemed to be inconsistent with As of right use: (i) a requirement that Multi-family housing meet higher energy efficiency standards than other uses; (ii) a requirement that a Multi-family use achieve a third party certification that is not required for other uses in the district; and (iii) a requirement that Multi-family use must be combined with commercial or other uses on the same Lot or as part of a single project. Mixed use projects may be allowed As of right in a Multi-family zoning district, as long as Multi-family housing is separately allowed As of right.

#### 72.05: Determining "Reasonable Size"

(1) In making determinations of "reasonable size," EOHLC will take into consideration both the land area of the Multi-family zoning district, and the Multi-family zoning district's Multi-family unit capacity.

(a) Minimum land area. A zoning district is a specifically delineated land area with uniform regulations and requirements governing the use of land and the placement, spacing, and size of buildings. For purposes of compliance with G.L. c. 40A, § 3A, a Multi-family zoning district should be a neighborhood-scale district, not a single development site on which the municipality is willing to permit a particular Multi-family project. EOHLC will certify compliance with G.L. c. 40A, § 3A only if an MBTA community's Multi-family zoning district meets the minimum land area applicable to that MBTA community, if any, as set forth in the MBTA Community Categories and Requirements. The minimum land area for each MBTA community has been determined as follows:

1. In Rapid transit communities, Commuter rail communities, and Adjacent communities, the minimum land area of the Multi-family zoning district is 50 acres, or 1.5% of the

Developable land in an MBTA community, whichever is less. In certain cases, as set forth in the MBTA Community Categories and Requirements a smaller minimum land area applies.

2. In Adjacent small towns, there is no minimum land area. In these communities, the Multi-family zoning district may comprise as many or as few acres as the community determines is appropriate, as long as the district meets the applicable minimum Multi-family unit capacity and the minimum Gross density requirements.

3. In all cases, at least half of the Multi-family zoning district land areas must comprise contiguous Lots of land. No portion of the district that is less than 5 contiguous acres land will count toward the minimum size requirement. If the Multi-family unit capacity and Gross density requirements can be achieved in a district of fewer than 5 acres, then the district must consist entirely of contiguous Lots.

(b) Minimum Multi-family unit capacity. A reasonably sized Multi-family zoning district must also be able to accommodate a reasonable number of Multi-family housing units As of right. For purposes of determinations of compliance with G.L. c. 40A, § 3A, EOHLC will consider a reasonable Multi-family unit capacity for each MBTA community to be a specified percentage of the total number of housing units within the community, with the applicable percentage based on the type of Transit service in the community, as shown on Table 1:

Table 1.

<u>Category</u>	<u>Percentage of total housing units</u>
Rapid transit community	25%
Commuter rail community	15%
Adjacent community	10%
Adjacent small town	5%

1. To be deemed in compliance with G.L. c. 40A, § 3A, each MBTA community must have a Multi-family zoning district with a Multi-family unit capacity equal to or greater than the minimum unit capacity as determined by EOHLC in accordance with the MBTA Community Categories and Requirements. The minimum Multi-family unit capacity for each MBTA community has been determined as follows:

a. First, by multiplying the number of housing units in that community by 0.25, 0.15, 0.10, or .05 depending on the MBTA community category. For example, a Rapid transit community with 7,500 housing units is required to have a Multi-family zoning district with a Multi-family unit capacity of  $7,500 \times 0.25 = 1,875$  Multi-family units. For purposes of 760 CMR 72.00, the number of total housing units in each MBTA community has been established by reference to the most recently published United States Decennial Census of Population and Housing.

b. Second, when there is a minimum land area applicable to an MBTA community, by multiplying that minimum land area (up to 50 acres) by G.L. c. 40A, § 3A's minimum gross density requirement of 15 units per acre. The product of that multiplication creates a floor on Multi-family unit capacity. For example, an MBTA community with a minimum land area of 40 acres must have a district with a Multi-family unit capacity of at least 600 (40 x 15) units.

c. The minimum unit capacity applicable to each MBTA community is the greater of the numbers resulting from steps (i) and (ii) above, but subject to the following limitation: In no case does the minimum Multi-family unit capacity exceed 25% of the total housing units in that MBTA community.

Example: The minimum multi-family unit capacity for an Adjacent community with 1,000 housing units and a minimum land area of 50 acres is determined as follows:(i) first, by multiplying  $1,000 \times .1 = 100$  units; (ii) second, by multiplying  $50 \times 15 = 750$  units;(iii) by taking the larger number, but adjusting that number down, if necessary, so that unit capacity is no more than 25% of  $1,000 = 250$  units. In this case, the adjustment in step (iii) results in a minimum unit capacity of 250 units.

(c) Unit Capacity in Mixed-Use Development Districts

1. In making determinations of whether an MBTA community has a Multi-family zoning district of "reasonable size" under this section, EOHLC shall also take into consideration the existence and impact of Mixed-use development zoning districts, subject to the requirements below.

2. EOHLC shall take these Mixed-use development districts into consideration as reducing the unit capacity needed for a Multi-family zoning district to be "reasonable" (in accordance with the MBTA Community Categories and Requirements) where:

- a. the Mixed-use development zoning district is in an eligible location where existing village-style or downtown development is essential to preserve pedestrian access to amenities;
- b. there are no age restrictions or limits on unit size, number of bedrooms, bedroom size or number of occupants and the residential units permitted are suitable for families with children;
- c. Mixed-used development in the district is allowed As of right as that phrase has been interpreted by EOHLC (for example, in 760 CMR 72.04(1)(b) with respect to affordability requirements);
- d. the requirement for non-residential uses is limited to the ground floor of buildings, and in no case represents a requirement that more than thirty-three percent of the floor area of a building, Lot, or project must be for non-residential uses;
- e. the requirement for non-residential uses does not preclude a minimum of three residential dwelling units per Lot;
- f. the requirement for non-residential uses allows a broad mix of non-residential uses As-of-right in keeping with the nature of the area; and

g. there are no minimum parking requirements associated with the non-residential uses allowed As of right.

2. An MBTA community asking to reduce the unit capacity requirement for its Multi-family zoning district(s) based on the unit capacity for one or more Mixed-use development districts shall submit to EOHLC, on a form to be provided by EOHLC, a request for a determination that the Mixed-use development district is in an eligible location meeting the requirements of 760 CMR 72.05(1)(c)2.a. This request must be submitted at least 90 days prior to the vote of the MBTA community's legislative body. An MBTA community also may submit a broader inquiry as to G.L. c. 40A, § 3A compliance in accordance with 760 CMR 72.09(5). EOHLC shall respond prior to the vote of the MBTA community's legislative body if the request is timely submitted.

3. In any community with both a Multi-family zoning district and a Mixed-use development district that meets these considerations, the unit capacity requirement for the Multi-family zoning district, as stated in the MBTA Community Categories and Requirements, shall be reduced by the lesser of:

- a. the unit capacity of Residential dwelling units in the Mixed-use development district or subdistrict (as calculated by EOHLC using a methodology similar to that in 760 CMR 72.05(1)(d) which takes into account the impact of non-residential uses), or
- b. twenty five percent of the unit capacity requirement as stated in the MBTA Community Categories and Requirements. This consideration shall not affect the minimum land area acreage or contiguity requirements for a Multi-family zoning district otherwise required by 760 CMR 72.00.

(d) Methodology for determining a Multi-family zoning district's multi-family unit capacity.

1. MBTA communities seeking a determination of compliance must use the EOHLC Compliance model to provide an estimate of the number of Multi-family housing units that can be developed As of right within the Multi-family zoning district. The Multi-family unit capacity of an existing or proposed district shall be calculated using the unit capacity worksheet described in the Compliance Methodology Model. This worksheet produces an estimate of a district's Multi-family unit capacity using inputs such as the amount of Developable land in the district, the dimensional requirements applicable to Lots and buildings (including, for example, height limitations, lot coverage limitations, and maximum floor area ratio), and the parking space requirements applicable to Multi-family uses.

2. Minimum unit capacity is a measure of whether a Multi-family zoning district is of a reasonable size, not a requirement to produce housing units. Nothing in G.L. c. 40A, § 3A or 760 CMR 72.00 should be interpreted as a mandate to construct a specified number of housing units, nor as a housing production target. Demonstrating compliance with the minimum multi-family unit capacity requires only that an MBTA community show that the zoning allows multi-family housing as of right and that a sufficient number of multi-

family housing units could be added to or replace existing uses and structures over time—even though such additions or replacements may be unlikely to occur soon.

3. If an MBTA community has two or more zoning districts in which Multi-family housing is allowed As of right, then two or more districts may be considered cumulatively to meet the minimum land area and minimum Multi-family unit capacity requirements, as long as each district independently complies with G.L. c. 40A, § 3A's other requirements and 760 CMR 72.00.

(e) Water and wastewater infrastructure within the multi-family zoning district

1. MBTA communities are encouraged to consider the availability of water and wastewater infrastructure when selecting the location of a new Multi-family zoning district. Compliance with G.L. c. 40A, § 3A does not require a municipality to install new water or wastewater infrastructure, or add to the capacity of existing infrastructure, to accommodate future Multi-family housing production within the Multi-family zoning district. In most cases, Multi-family housing can be created using private septic and wastewater treatment systems that meet state environmental standards. Where public systems currently exist, but capacity is limited, private developers may be able to support the cost of necessary water and sewer extensions. While the zoning must allow for gross average density of at least 15 units per acre, there may be other legal or practical limitations, including lack of infrastructure or infrastructure capacity, that result in actual housing production at lower density than the zoning allows.

2. The Multi-family unit capacity analysis does not need to take into consideration limitations on development resulting from existing water or wastewater infrastructure within the Multi-family zoning district, or, in areas not served by public sewer, any applicable limitations under title 5 of the state environmental code. For purposes of the unit capacity analysis, it is assumed that housing developers will design projects that work within existing water and wastewater constraints, and that developers, the municipality, or the Commonwealth will provide funding for infrastructure upgrades as needed for individual projects.

72.06: Minimum Gross Density

(1) G.L. c. 40A, § 3A expressly requires that a Multi-family zoning district—not just the individual lots of land within the district—must have a minimum Gross density of 15 units per acre, subject to any further limitations imposed by G.L. c. 131 and title 5 of the state environmental code established pursuant to G.L. c. 21A. G.L. c. 40A, § 1A defines “Gross density” as “a units-per-acre density measurement that includes land occupied by public rights-of-way and any recreational, civic, commercial and other nonresidential uses.”

(2) District-wide Gross density.

(a) To meet the district-wide Gross density requirement, the dimensional restrictions and parking requirements for the Multi-family zoning district must allow for a Gross density of

15 units per acre of land within the district. By way of example, to meet that requirement for a 40-acre Multi-family zoning district, the zoning must allow for at least 15 multi-family units per acre, or a total of at least 600 Multi-family housing units.

(b) For purposes of determining compliance with G.L. c. 40A, § 3A's Gross density requirement, the EOHLC Compliance model will not count in the denominator any excluded land located within the Multi-family zoning district, except public rights-of-way, private rights-of-way, and publicly-owned land used for recreational, civic, commercial, and other nonresidential uses. This method of calculating minimum Gross density respects G.L. c. 40A, § 1A's definition of Gross density—"a units-per-acre density measurement that includes land occupied by public rights-of-way and any recreational, civic, commercial and other nonresidential uses"—while making it unnecessary to draw patchwork Multi-family zoning districts that carve out wetlands and other types of excluded land that are not developed or developable.

(3) Achieving district-wide gross density by sub-districts. Zoning ordinances and by-laws typically limit the unit density on individual lots. To comply with G.L. c. 40A, § 3A's Gross density requirement, an MBTA community may establish reasonable sub-districts within a Multi-family zoning district, with different density limits for each sub-district, provided that the Gross density for the district as a whole meets the statutory requirement of not less than 15 Multi-family units per acre. EOHLC will review sub-districts to ensure that the density allowed As of right in each sub-district is reasonable and not intended to frustrate the purpose of G.L. c. 40A, § 3A by allowing projects of a such high density that they are not likely to be constructed.

(4) Wetland and septic considerations relating to density. G.L. c. 40A, § 3A provides that a district of reasonable size shall have a minimum Gross density of 15 units per acre, "subject to any further limitations imposed by section 40 of chapter 131 and title 5 of the state environmental code established pursuant to G.L. c. 21A, § 13." This directive means that even though the zoning district must permit 15 units per acre As of right, Multi-family housing produced within the district is subject to, and must comply with, the state wetlands protection act and title 5 of the state environmental code—even if such compliance means a proposed project will be less dense than 15 units per acre.

#### 72.07: Determining Suitability for Families with Children

G.L. c. 40A, § 3A states that a compliant Multi-family zoning district must allow Multi-family housing As of right, and that such multi-family housing shall be without age restrictions and shall be suitable for families with children. EOHLC will deem a Multi-family zoning district to comply with these requirements as long as the zoning does not require Multi-family uses to include units with age restrictions, and does not limit or restrict the size of the units, cap the number of bedrooms, the size of bedrooms, or the number of occupants, or impose a minimum age of occupants. Limits, if any, on the size of units or number of bedrooms established by state law or regulation are not relevant to G.L. c. 40A, §3A or to determinations of compliance made pursuant to 760 CMR 72.00.

#### 72.08: Location of Districts

(1) General rule for determining the applicability of G.L. c. 40A, § 3A's location requirement.

(a) A Multi-family zoning district shall "be located not more than 0.5 miles from a commuter rail station, subway station, ferry terminal or bus station, if applicable." When an MBTA community has only a small amount of Transit station area within its boundaries, it may not be possible or practical to locate all of the Multi-family zoning district within 0.5 miles of a Transit station. Transit station area may not be a practical location for a Multi-family zoning district if it does not include Developable land where Multi-family housing can actually be constructed. Therefore, for purposes of determining compliance with G.L. c. 40A, § 3A and 760 CMR 72.00, EOHLC will consider the statute's location requirement to be "applicable" to a particular MBTA community only if that community has within its borders at least 100 acres of Developable station area. A Multi-family zoning district shall be located within transit station areas depending on how much total developable station area is in that community, in accordance with Table 2:

Table 2.

<u>Total Developable station area within the MBTA community (acres)</u>	<u>Portion of the Multi-family zoning district that must be within a transit station area</u>
0-100	0%
101-250	20%
251-400	40%
401-600	50%
601-800	75%
801+	90%

(b) The percentages specified in this table apply to both the minimum land area and the minimum Multi-family unit capacity. For example, in an MBTA community that has a total of 500 acres of Transit station area within its boundaries, a Multi-family zoning district will comply with G.L. c. 40A, § 3A's location requirement if at least 50 percent of the district's minimum land area is located within the Transit station area, and at least 50 percent of the district's minimum Multi-family unit capacity is located within the Transit station area.

(c) A community with Transit station areas associated with more than one Transit station may locate the Multi-family zoning district in any of the Transit station areas. For example, a Rapid transit community with Transit station area around a Subway station in one part of town, and Transit station area around a Commuter rail station in another part of town, may locate its Multi-family zoning district in either or both Transit station areas.

(d) MBTA communities with limited or no Transit station area. When an MBTA community has less than 100 acres of Developable station area within its boundaries, the MBTA community may locate the Multi-family zoning district anywhere within its boundaries. To encourage transit-oriented Multi-family housing consistent with the general intent of G.L. c. 40A, § 3A, MBTA communities are encouraged to consider locating the Multi-family zoning

district in an area with reasonable access to a Transit station based on existing street patterns, pedestrian connections, and bicycle lanes, or in an area that qualifies as an “eligible location” as defined in G.L. c. 40A—for example, near an existing downtown or village center, near a regional transit authority bus stop or line, or in a location with existing under-utilized facilities that can be redeveloped into new Multi-family housing.

(2) General guidance on district location applicable to all MBTA communities. When choosing the location of a new Multi-family zoning district, every MBTA community should consider how much of a proposed district is Sensitive land on which permitting requirements and other considerations could make it challenging or inadvisable to construct Multi-family housing. For example, an MBTA community should avoid including in a Multi-family zoning district areas that are subject to flooding, or are known habitat for rare or threatened species, or have prime agricultural soils in active agricultural use.

#### 72.09: Determinations of Compliance

(1) G.L. c. 40A, §3A provides that any MBTA community that fails to comply with G.L. c. 40A, § 3A’s requirements will be ineligible for funding from any of the Listed funding sources. EOHLC will make determinations of compliance with G.L. c. 40A, § 3A in accordance with 760 CMR 72.00 to inform state agency decisions on which MBTA communities are eligible to receive funding from the Listed funding sources. The following discretionary grant programs will take compliance with G.L. c. 40A, § 3A into consideration when making grant award recommendations:

- (a) Community Planning Grants, EOHLC,
- (b) Massachusetts Downtown Initiative, EOED,
- (c) Urban Agenda, EOED,
- (d) Rural and Small Town Development Fund, EOED,
- (e) Brownfields Redevelopment Fund, MassDevelopment,
- (f) Site Readiness Program, MassDevelopment,
- (g) Underutilized Properties Program, MassDevelopment,
- (h) Collaborative Workspace Program, MassDevelopment,
- (i) Real Estate Services Technical Assistance, MassDevelopment,
- (j) Commonwealth Places Programs, MassDevelopment,
- (k) Land Use Planning Grants, EOEEA,
- (l) Local Acquisitions for Natural Diversity (LAND) Grants, EOEEA, and
- (m) Municipal Vulnerability Preparedness (MVP) Planning and Project Grants, EOEEA

(2) Determinations of compliance also may inform other funding decisions by EOED, EOHLC, the MBTA and other state agencies which consider local housing policies when evaluating applications for discretionary grant programs or making other discretionary funding decisions.

(3) EOHLC will recognize both interim compliance, which means an MBTA community is taking active steps to enact a Multi-family zoning district that complies with G.L. c. 40A, § 3A, and District compliance is achieved when EOHLC determines that an MBTA community has a Multi-family zoning district that complies with G.L. c. 40A, § 3A and the requirements set forth

below. Table 3 includes deadlines, shown with an asterisk, established under prior guidelines that many municipalities have met, and prospective deadlines for certain categories of municipalities as shown without an asterisk.

Table 3.

Transit Category	Deadline to Submit Action Plan	Deadline to Submit District Compliance Application
Rapid transit community	January 31, 2023*	December 31, 2023*
Commuter rail community	January 31, 2023*	December 31, 2024*
Adjacent community	January 31, 2023*	December 31, 2024*
Adjacent small town	January 31, 2023*	December 31, 2025
Rapid transit community that has not submitted a district compliance application to EOHLC as of December 31, 2023	February 13, 2025	July 14, 2025
Commuter rail community that has not submitted a district compliance application to EOHLC as of December 31, 2024	February 13, 2025	July 14, 2025
Adjacent community that has not submitted a district compliance application to EOHLC as of December 31, 2024	February 13, 2025	July 14, 2025

(4) Process to achieve interim compliance. Prior to achieving district compliance (but no later than the deadlines set forth in Table 3), these MBTA communities can achieve interim compliance by taking the following affirmative steps towards the creation of a compliant Multi-family zoning district.

(a) Creation and submission of an action plan. An MBTA community seeking to achieve interim compliance must first submit an action plan on a form to be provided by EOHLC. An MBTA community action plan must provide information about current zoning, past planning for Multi-family housing, if any, and potential locations for a Multi-family zoning district. The action plan also will require the MBTA community to establish a timeline for various actions needed to create a compliant Multi-family zoning district.

(b) EOHLC approval of an action plan. EOHLC will review each submitted action plan for consistency with 760 CMR 72.00, including but not limited to the timelines in Table 3. If EOHLC determines that the MBTA community's action plan is reasonable and will lead to district compliance in a timely manner, EOHLC will issue a determination of interim

compliance. EOHLC may require modifications to a proposed action plan prior to approval.

(c) Implementation of the action plan. After EOHLC approves an action plan and issues a determination of interim compliance, an MBTA community must diligently implement the action plan. EOHLC may revoke a determination of interim compliance if an MBTA community has not made sufficient progress in implementing an approved action plan. EOHLC and EOED will review an MBTA community's progress in implementing its action plan prior to making an award of funds under the Housing Choice Initiative and Massworks infrastructure program.

(d) Deadlines for submitting action plans. An MBTA community that does not submit an action plan by the applicable deadline set forth in Table 3 may not receive a EOHLC determination of interim compliance in time to receive an award of funds from the listed funding sources. An MBTA community that does not achieve interim compliance in time for the Community One Stop for Growth Application deadline may submit an action plan to become eligible for a subsequent round of the One Stop Application, provided that an action plan must be submitted by no later than the applicable deadline of the year in which the MBTA community seeks to establish grant eligibility; and provided further that no action plan may be submitted or approved after the applicable district compliance application deadline set forth in Table 3.

(5) Assistance for communities implementing an action plan. MBTA communities are encouraged to communicate as needed with EOHLC staff throughout the process of implementing an action plan, and may inquire about whether a proposed Multi-family zoning district complies with G.L. c. 40A, § 3A prior to a vote by the municipal legislative body to create or modify such a district. Such requests shall be made on a form to be provided by EOHLC. If a request is submitted at least 90 days prior to the vote of the legislative body, EOHLC shall respond prior to the vote.

(6) Requests for determination of district compliance. An MBTA community must request a determination of district compliance from EOHLC by submitting an application form required by EOHLC and shall include, at a minimum, the following information:

- (a) A certified copy of the municipal zoning ordinance or by-law and zoning map, including all provisions that relate to uses and structures in the multi-family zoning district.
- (b) An estimate of multi-family unit capacity using the compliance model.
- (c) GIS shapefile for the multi-family zoning district.
- (d) In the case of a by-law enacted by a town, evidence that the clerk has submitted a copy of the adopted multi-family zoning district to the office of the Attorney General for approval as required by state law, or evidence of the Attorney General's approval.

(7) After receipt of a request for determination of district compliance, EOHLC will notify the requesting MBTA community within 30 days if additional information is required to process the request. Upon reviewing a complete application, EOHLC will provide the MBTA community a written determination stating one of the following:

- (a) that the existing Multi-family zoning district complies with G.L. c. 40A, § 3A and 760 CMR 72.00;
- (b) that the Multi-family zoning district has been determined to be conditionally compliant with G.L. c. 40A, § 3A and 760 CMR 72.00, provided that the MBTA community meets the conditions expressed by EOHLC in its determination; or
- (c) that the Multi-family zoning district fails to comply with G.L. c. 40A, § 3A and 760 CMR 72.00 and the steps that must be taken to achieve compliance.

(8) An MBTA community that has achieved interim compliance prior to requesting a determination of district compliance shall remain in interim compliance for the period during which a request for determination of district compliance, with all required information, is pending at EOHLC.

#### 72.10: Ongoing Obligations; Rescission of a Determination of Compliance

(1) After receiving a determination of compliance, an MBTA community must notify EOHLC in writing of any zoning amendment or proposed zoning amendment that affects the compliant Multi-family zoning district, or any other by-law, ordinance, rule or regulation that limits the development of Multi-family housing in the Multi-family zoning district.

(2) EOHLC may rescind a determination of district compliance, or require changes to a Multi-family zoning district to remain in compliance, if EOHLC determines that:

- (a) The MBTA community submitted inaccurate information in its application for a determination of compliance;
- (b) The MBTA community failed to notify EOHLC of a zoning amendment that affects the Multi-family zoning district;
- (c) The MBTA community enacts or amends any by-law or ordinance, or other rule or regulation, that materially alters the minimum land area and/or the Multi-family unit capacity in the Multi-family zoning district;
- (d) A board, authority or official in the MBTA community does not issue permits, or otherwise acts or fails to act, to allow construction of a Multi-family housing project that is allowed As of right in the Multi-family zoning district (or any Mixed-use zoning development district taken into account in determining the required Multi-family unit capacity in the Multi-family zoning district);
- (e) The MBTA community takes other action that causes the Multi-family zoning district to no longer comply with G.L. c. 40A, § 3A; or
- (f) An MBTA community with an approved Multi-family zoning district has changed transit category as a result of a newly opened or decommissioned Transit station, or the establishment of permanent, regular service at a Transit station where there was formerly intermittent or event-based service.

#### 72.11: Changes to MBTA Service

(1) G.L. c. 40A, § 3A applies to the MBTA communities identified in G.L. c. 40A, § 1A and G.L. c. 161A, § 1. When MBTA service changes, the list of MBTA communities and/or the

transit category assignments of those MBTA communities in the MBTA Community Categories and Requirements may change as well.

(2) The community category assignments identified in the MBTA Community Categories and Requirements reflect certain MBTA service changes that are expected to result from the South Coast Rail and Green Line Extension projects. Affected MBTA communities are noted in the MBTA Community Categories and Requirements.

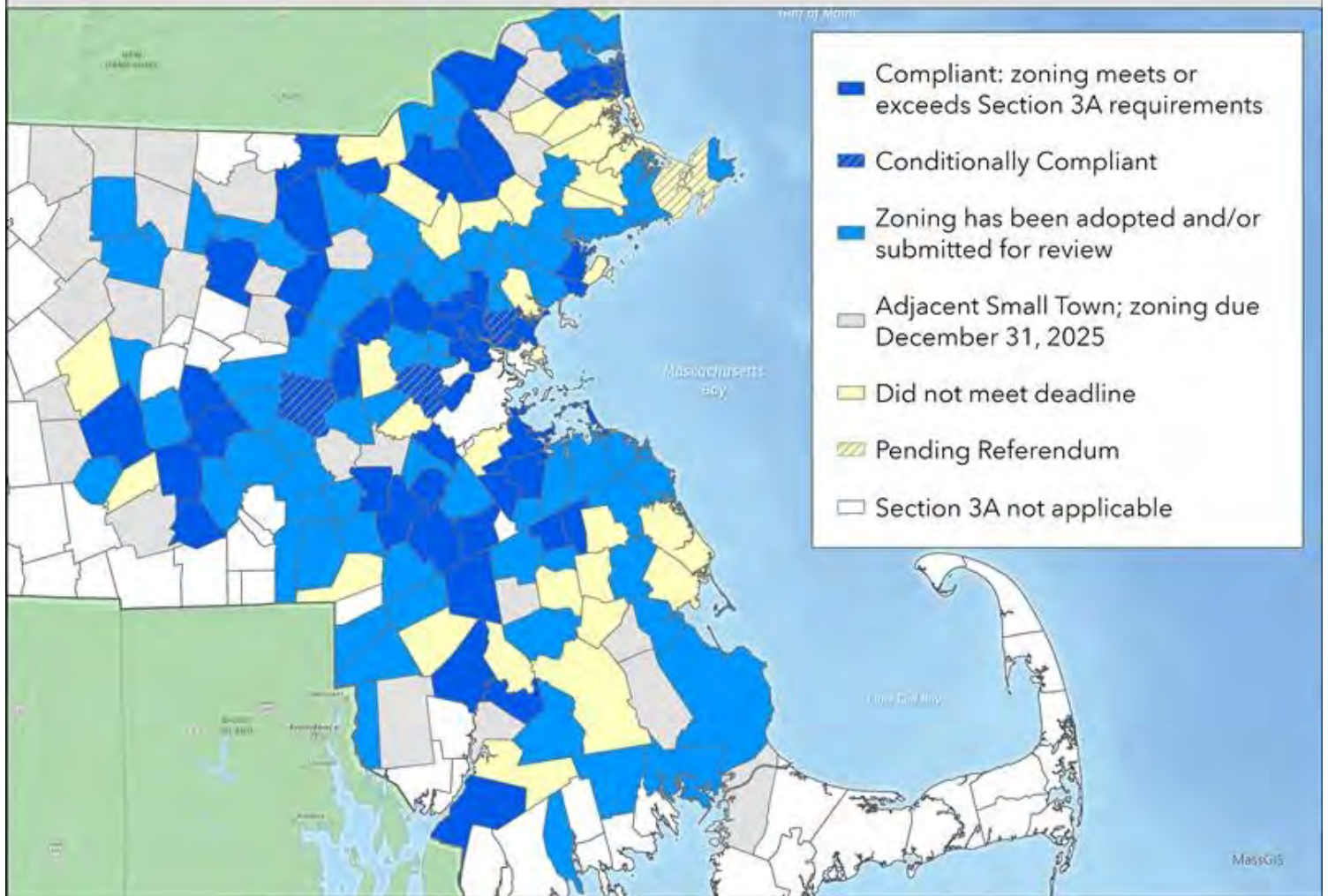
(3) Municipalities that are not now identified as MBTA communities and may be identified as such in the future are not addressed in 760 CMR 72.00 or included in the MBTA Community Categories and Requirements. New MBTA communities will be addressed with revisions to the MBTA Community Categories and Requirements, and separate compliance timelines.

(4) Future changes to Silver Line routes or stations may change district location requirements when expanded high-capacity service combined with new facilities creates a bus station where there was not one before. Changes to other bus routes, including the addition or elimination of bus stops or reductions or expansions of bus service levels, do not affect the transit categories assigned to MBTA communities and will not affect location requirements for Multi-family zoning districts. Any future changes to MBTA transit service, transit routes and transit service levels are determined by the MBTA Board of Directors consistent with the MBTA's Service Delivery Policy.

## REGULATORY AUTHORITY

760 CMR 72.00: M.G.L. c. 23B, M.G.L. c. 40A, § 3A

119 MBTA Communities submitted and/or adopted zoning to comply with the law  
44 have been determined fully compliant by EOHLC





# The Commonwealth of Massachusetts

## Manufactured Homes Commission

100 Cambridge Street, Suite 300  
Boston, MA 02114  
(617) 573-1100

February 20, 2025

Ed Augustus, Secretary  
Executive Office of Housing and Livable Communities  
100 Cambridge Street  
Boston, MA 02114

**RE: Comments on 760 CMR 72.00: Multi-Family Zoning Requirement for MBTA Communities**

Dear Secretary Augustus,

### **SUMMARY**

The members of the Massachusetts Manufactured Homes Commission strongly recommend the following changes to be included in 760 CMR 72.00: Multi-Family Zoning Requirement for MBTA Communities:

- Add to the regulation “An owner of any Manufactured Home Park, located within any of the 177 communities covered by the MBTA law, must provide simultaneous copies to the Attorney General’s Office, Executive Office of Housing and Livable Communities, and the Manufactured Homes Commission of any notice the owner sends to the tenants of the park informing them that the owner intends sell, close, or discontinue the park. Such owner shall also give simultaneous notice to the board of health or rent board for the city or town in which their Manufactured Home Park is located.”
- Add Manufactured Homes Parks to the definition of “Excluded Land” so that Manufactured Home Parks cannot be included in a proposed zoning district.
- An approved zoning district must require a buffer of at least 0.2 miles from a Manufactured Homes Park.

These recommended changes will help establish vital and urgent protections for residents of Manufactured Homes Communities from the unintended consequences of a good law that has already resulted in the complete destruction of an entire community of 120 affordable manufactured homes in Lee’s Trailer Park, Revere located ½ mile from an MBTA Blue Line Station.

### **DISCUSSION**

The members of the Massachusetts Manufactured Homes Commission submit the following recommendations regarding 760 CMR 72.00: Multi-Family Zoning Requirements for MBTA Communities. In accordance with G.L c. 6, § 108, the Commission is required to “*identify issues pertaining to manufactured housing communities, the owners of such communities, and the owners of manufactured homes and shall develop recommendations for means of dealing with these issues*”

and report such recommendations to the secretary of the Executive Office of Housing and Livable Communities and the Attorney General.

The Manufactured Homes Commission conditionally supports the goals of the MBTA Communities Law regulation, with the following recommended revisions, which seeks to create at least one zoning district in which multi-family housing is permitted by right in each of the 177 communities covered by the law. Massachusetts has approximately 250 Manufactured Homes Parks. Within the MBTA communities there are:

- Approximately 143 Manufactured Homes Parks
- 30 Manufactured Homes Parks within 1 mile of an MBTA station
- 12 Manufactured Homes Parks within ½ mile of an MBTA station

This proximity increases the risk of displacement of residents and increases the financial gains for redevelopment with the very high likelihood of a net loss of affordable housing due to the increased value of the park land. By re-zoning these communities and allowing “as of right” development, minimal protections and oversight are afforded to the park communities and residents. The Attorney General’s Office and the Executive Office of Housing and Affordable Housing need additional regulatory tools to ensure that the parks residents’ rights are protected.

Manufactured homes are a primary source of affordable unsubsidized housing, yet many residents live with high levels of housing insecurity. Manufactured homes are typically installed in land-lease communities which grant individuals to be “halfway homeowners” meaning they own their homes but have no rights to the land underneath them. Furthermore, manufactured homes (formerly known as mobile homes) are not mobile once they are installed in a park. These land-lease communities or Manufactured Home Parks are mainly developed and owned by private investors. With the relative ease of demolition, parks that have been spatially separated and “visually screened” from outside view, homes that cannot be relocated and lack of residents’ ownership of land make Manufactured Home Parks a prime target by investors and developers for mass evictions, demolition, and development often with a significant loss of affordable homes.

### **LEE’S TRAILER PARK, REVERE – LOSS OF A COMMUNITY**

A recent and tragic example of the unintended pressure created by the impending implementation of the MBTA Communities Law is the former Lee’s Trailer Park, Revere, MA. The park was sold on July 17, 2021 by Greater Parkway Owners, LLC to Helge Capital, LLC. Helge Capital, LLC is registered to Oleg Uritsky, a real estate investor and entrepreneur. His past investments have been focused on land acquisition and new development projects which indicated his plans for this park. By December 2022, residents were being aggressively pushed out with representatives of the property owner knocking on doors daily demanding residents to sign agreements to leave, homes being crushed when residents did not fully move out, vital services not being maintained and homes being demolished without asbestos abatement. What was once a manufactured home park with approximately 120 homes, it was virtually abandoned by April, 2023 with one family remaining though the landowner illegally turning their water off on April 17, 2023. The park was fully vacated by August, 2023. Many former residents struggled to find new housing, some sleeping in cars in a nearby complex parking lot. Due to the immobility of manufactured homes, residents were forced to leave possessions which were destroyed in the demolition process. In response to a request by WBUR, Mr. Uritsky stated that the reason for this purchase and demolition was related to the expected new transit oriented development near the MBTA Blue Line

Beachmont Station (1/2 mile from the station). The current development proposal for the former park is for a 250 unit building with 25 affordable units. **This is a net loss of approximately 100 affordable homes previously located in the park.**

The Attorney General Office and EOHLC were powerless to intervene or provide the statutory/regulatory protections for residents living in Lee's Trailer Park because there is no requirement to notify the AGO or EOHLC of a closure or discontinuance of a park. The state offices became aware only after the new owner was in the process of forcing the last residents out and in the midst of active demolition. A fundamental gap in the statutory and regulatory structure is that there was no requirement for the Attorney General's Office or the Executive Office of Housing and Livable Communities to be notified of a closure or discontinuance of a Manufactured Homes Park. We believe that if that if notification prior to the closure was required to the AGO and EOHLC, the residents of Lee's Trailer Park, at a minimum, would have had the benefits of the various protections as residents of Manufactured Homes Parks. Instead, they suffered from loss of their homes, belongings, health, stability and community and the Commonwealth lost 125 affordable homes.

Please see the attached report researched and written by Naomi Gross and Erika Teetsel, Boston University School of Public Health, April 27, 2023 for additional information including a technical analysis, list of parks in MBTA communities and recommendations.

In conclusion, we respectfully request the three revisions be included in 760 CMR 72.00: Multi-Family Zoning Requirement for MBTA Communities:

1. Add to the regulation "An owner of any Manufactured Home Park, located within any of the 177 communities covered by the MBTA law, must provide simultaneous copies to the Attorney General's Office, Executive Office of Housing and Livable Communities, and the Manufactured Homes Commission of any notice the owner sends to the tenants of the park informing them that the owner intends sell, close, or discontinue the park. Such owner shall also give simultaneous notice to the board of health or rent board for the city or town in which their Manufactured Home Park is located."
2. Add Manufactured Homes Parks to the definition of "Excluded Land" so that Manufactured Home Parks cannot be included in a proposed zoning district.
3. An approved zoning district must require a buffer of at least 0.2 miles from a Manufactured Homes Park.

Thank you for your consideration of these recommendations to preserve an important existing source of unsubsidized affordable housing for vulnerable residents in Massachusetts. These proposed revisions to the regulation can ensure that all residents of Manufactured Homes Parks within MBTA communities are protected by law. These recommendations will help prevent another tragedy like Lee's Trailer Park, Revere that destroyed the homes of residents who were disabled, elderly, veterans, new citizens, school children and young families.

This letter was approved by the Massachusetts Manufactured Homes Commission at a special meeting held on February 17, 2025 with three in favor, none against and one abstention:

MA Manufactured Homes Commission Comments

760 CMR 72.00: Multi-Family Zoning Requirements for MBTA Communities

Page 4 of 4

Ethan Mascoop, Chair – Aye

Sandy Overlock, Member – Aye

Paula Fay, Member – Aye

Jeff Hallahan, Member – Absent

Dan Less, Ex Officio, AGO – Abstain

Tyler Newhall, Ex Officio, EOHLC – Absent during vote

Respectfully submitted,

Ethan Mascoop, MPH, RS

Chairman, Massachusetts Manufactured Homes Commission

Encl: Presentation to the Manufactured Homes Commission by Naomi Gross and Erika Teetsel,  
4/27/2023

**To:** Ethan Mascoop, Chair of the Manufactured Homes Commission

**From:** Naomi Gross & Erika Teetsel, MPH Candidates in Environmental Health at Boston University & Manufactured Housing Advocates

**Date:** 27 April, 2023

**Re:** Multi-family Zoning Districts Under Section 3A of the Zoning Act - Protecting Existing Residents of Manufactured Home Parks

Manufactured housing parks (MHPs) provide affordable housing options for thousands of Massachusetts residents. However, these communities are facing an increasing threat of displacement from the new Section of the Zoning Act, focusing on Transit Oriented Development (TOD). TOD seeks to create high-density, mixed-use developments around transit hubs. As a result, the Commission must take action to ensure that MHPs are not displaced or destroyed by this new development focused statute. We recommend that census data be collected for park details and resident demographics as well as increasing your communication with DHCD.

Forced relocation associated with eviction or mass displacement resulting from development and gentrification has been a long-term problem for low-income communities. Rates of eviction have been increasing in the United States due to rising rents, rising utility costs, decreasing incomes, and decreasing investment in federal and state housing assistance. Massachusetts has the fastest growing rental rates in the nation, with rising costs heavily impacting low-income families. To address this housing crisis, in 2022, Massachusetts state passed Section 3A of the Zoning Act. This focuses on Transit Oriented Development (TOD) with the goal of increasing high-density multi-family housing near transit stops. Cities and towns qualify by having either a MBTA stop, a Commuter Rail stop, a Ferry stop, or being an adjacent city/town to one of those transit stops. There are 175 cities and towns that fall under this definition. To achieve compliance Cities and Towns have to create multi-family zoning districts within approximately one-half mile from MBTA stations. While this law is an important step forward in addressing the state's housing crisis, we are concerned about the unintended consequences to MHPs that were not considered during the drafting of this law.

Massachusetts has approximately 250 manufactured home parks (MHP), and 143 of these MHPs fall within a MBTA community. Thirty MHPs fall within 1 mile of MBTA stations, and 12 MHPs within a ½ mile radius of MBTA stations. This close proximity increases their risk of displacement and redevelopment due to their potential to be rezoned as multi-family housing. By re-zoning these MHPs, and allowing "as of right" development minimal protections and oversight are afforded to MHPs and residents. To address the increased vulnerability, we respectfully recommend the following actions:

1. Conduct a physical census of all Massachusetts Manufactured Home Parks and Resident demographics.
  - a. The current data have gaps, and inaccuracies limiting its use and effectiveness in assessing location, risk, and demographics of MHPs.
  - b. Survey all MHPs to identify those using septic systems, public and private well use, with a focus on identifying possible PFAS contamination.
  - c. This will not only improve future research, but it will also provide a deeper understanding of who exactly is being impacted by this and future issues.

- d. Finally, the commission can use this as a tool for relationship development with the communities.
2. Advocate to update “Massachusetts General Laws Chapter 6, Section 108: Manufactured homes commission; members; duties; compensation” to include new language for zoning proposals with DHCD.
  - a. The current enabling statute states that the Commission “may develop, with the Department of Housing and Community Development (DHCD), proposals for specific zoning standards to be applicable to new manufactured housing communities in order to ensure that all such new communities are well designed, attractive, and suited to the needs of manufactured homeowners;”.
  - b. We recommend that language be updated to include existing communities as well, so if/when zoning issues emerge, there is guidance.
  - c. (eg) *In conjunction with the department of housing and community development, the commission may develop proposals for specific zoning standards to be applicable for the protection of existing and new manufactured housing communities in order to ensure that all such ~~new~~ communities are well designed, attractive, and suited to meeting the needs of manufactured home ~~owners~~ residents including any time zoning policies are under discussion by municipalities.*
3. Request certified zoning maps and action plans for every town in Massachusetts from the Attorney General office DHCD respectively.
  - a. Certified zoning maps are the only effective way of assessing zoning at the parcel level which is needed to further assess risk of MHPs.
  - b. If the MHP Commission has the opportunity to assess the submitted action plans, the commission could proactively support MHP residents and their homes.
  - c. Advocate for MassGIS to include municipal zoning maps as additional layer available to the public.
4. Partner with DHCD as they develop guidelines related to Section 3a of the Zoning Act, to ensure that existing manufactured home parks are prioritized in their development.
  - a. This will be imperative for ongoing communication and advocacy of these parks.

If these recommendations are followed, we believe significant improvements will be seen in monitoring each park. Investing time in this today will allow for deeper analysis in research, increased protection, and oversight of MHPs, and connections with residents in the future.

For further discussion on the matter please contact us at:

Naomi Gross at [ngross@bu.edu](mailto:ngross@bu.edu) &

Erika Teetsel at [eteetse@bu.edu](mailto:eteetse@bu.edu)

## Technical Analysis

### Background

Massachusetts has approximately 250 manufactured home parks in the state. Despite having the strongest legal protections for residents of manufactured homes in the country, many residents still live in a tenuous relationship as both renter and homeowner.<sup>1</sup>

Nationally, manufactured homes make up that vast majority of unsubsidized housing, with approximately 18 million people living in manufactured homes across the US.<sup>2,3</sup> Manufactured homes effectively have become a large portion of the low-income housing supply. Nationally, the rise of manufactured housing occurred in parallel to the rollback of federal and state funds for affordable and low-income housing.<sup>2</sup> Massachusetts has the third highest rental prices in the nation, making much of the housing and rental stock cost prohibitive to low-income residents.<sup>4</sup> Manufactured home parks can be an affordable alternative to traditional housing.<sup>5</sup>

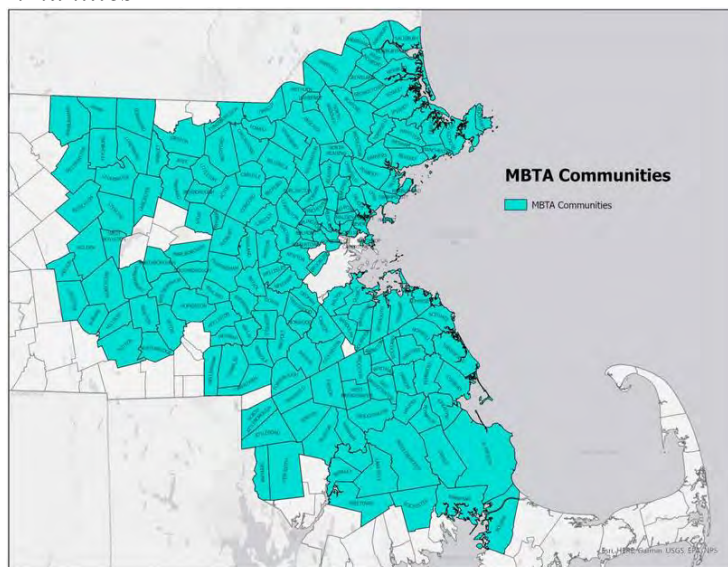
While manufactured homes become a primary option for many low-income residents, many residents live with high levels of housing insecurity. Manufactured homes are typically stationed in land-lease communities which grant individuals to be “halfway homeowners” meaning they own their homes but have no rights to the land underneath them.<sup>2</sup> These land-lease communities or Manufactured Home Parks are mainly developed and owned by private investors. Existing manufactured home parks are seen as a prime location for investment and development.<sup>6</sup> With relative ease of demolition, parks that have been spatially separated and “visually screened” from outside view, and low-income residents that have less access to outside resources, allow for manufactured home parks to be mass-evicted, demolished, and developed.<sup>3</sup> While national rates are unknown for manufactured home park closures, one study in Harris County Texas assessed the geospatial relationship of MHP closures.<sup>7</sup> They found that closures clustered along near urban growth occurred and corresponded to new development. This study shows the intersection of urban redevelopment and low-income housing pressures that occur in primary metropolitan areas.<sup>7</sup>

Lee’s Trailer Park, located in Revere MA, just north of Boston, has been experiencing dissolution and displacement since November 6th, 2022.<sup>1</sup> In the minutes of an April 2021 meeting of the Massachusetts’s Manufactured Homes Commission, residents raised a number of concerns including land rental increases and concerns about the redevelopment of the land.<sup>8</sup> Resident concerns quickly became reality when the park’s land was purchased by Greater Parkway Owners, LLC on July 17th, 2021.<sup>9</sup> This LLC is registered to Oleg Uritsky, a real estate investor and entrepreneur. His past investments have been focused on land acquisition and new development projects which indicated his plans for this park.<sup>10</sup> By December 2022, residents were pushed out and what was once a 100+ home park, was virtually abandoned and by April 2023 one family remained with the landowner illegally turning their water off on April 17th, 2023.<sup>8</sup> Many residents struggled to find new housing, some relocated to a near-by complex parking lot. Due to the immobility of manufactured homes, residents were forced to leave possessions which were destroyed in the demolition process. It has been insinuated by the new owner that the reason for this purchase/demolition is related to the new transit oriented development (TOD) for MA.<sup>11</sup> Photos of demolition can be found in *Appendix 2*.

## Transit Oriented Development and Section 3a of the Zoning Act

*An MBTA community shall have a zoning ordinance or by-law that provides for at least 1 district of reasonable size in which multi-family housing is permitted as of right; provided, however, that such multi-family housing shall be without age restrictions and shall be suitable for families with children. For the purposes of this section, a district of reasonable size shall: (i) have a minimum gross density of 15 units per acre, subject to any further limitations imposed by section 40 of chapter 131 and title 5 of the state environmental code established pursuant to section 13 of chapter 21A; and (ii) be located not more than 0.5 miles from a commuter rail station, subway station, ferry terminal or bus station, if applicable.<sup>12</sup>*

*Visual 1: MBTA Communities<sup>13</sup>*



Massachusetts is facing its own urban redevelopment plan. In 2022, the state passed Section 3A of the Zoning Act: which focuses on Transit Oriented Development, or TOD, with the goal of increasing high-density multi-family housing near transit hubs. This statute requires that all MBTA communities have at least one zoning district for multi-family housing with a minimum gross density of 15 units per acre, located a half-mile from transit stations. 175 cities and towns across the eastern portion of the state qualify by having either a MBTA stop, a Commuter Rail stop, a Ferry stop, or being an adjacent city/town to one of those transit stops. MBTA communities that do not comply with this zoning development will not be eligible for funds from the Housing Choice Initiative or MassWorks.<sup>14</sup>

The state empowered DHCD with the power to create guidelines and evaluate compliance, implementation, and assessment. Cities and Towns had to submit their initial Action Plans to DHCD by January 31, 2023, with different town categories having different submission deadlines for the district compliance application between December 31, 2023, and December 31, 2025. By the district compliance deadlines Cities and Towns need to have implemented the approved zoning districts meaning that they have passed through zoning board approvals and possibly town meetings.<sup>14</sup>

To achieve compliance Cities and Towns have to create multi-family zoning districts within approximately one-half mile from MBTA stations. These districts create a multi-family

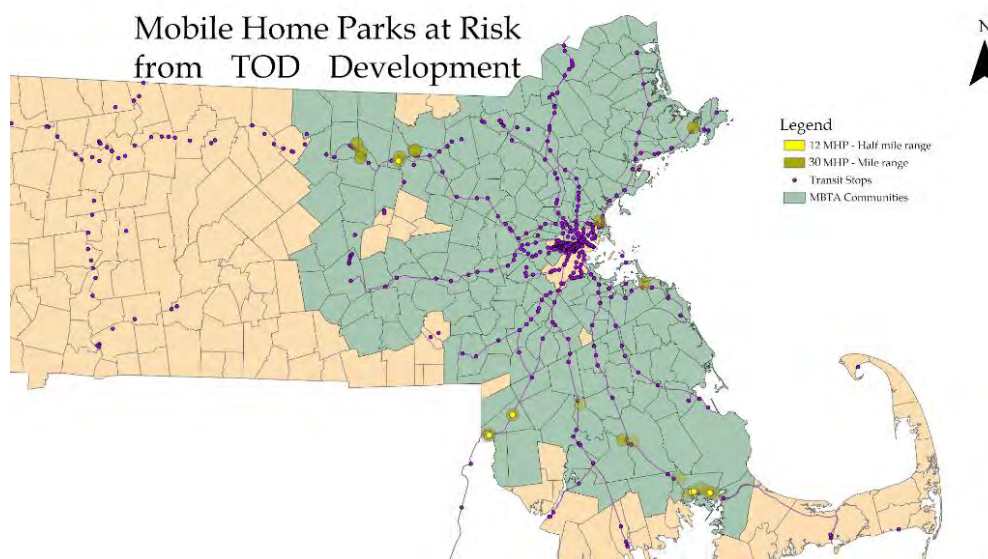
zoning district that allows development “as of right” meaning that developers do not need to seek additional approval from zoning boards to develop.<sup>14,15</sup> In addition to this requirement cities and towns are also not allowed to implement standards such as environmental building standards, higher energy efficiency standards, and affordable housing quotas above 10%. These requirements are included to ensure the easiest path forward for development of multi-family housing, however, they will potentially lead to a maintenance or decrease in affordable housing, since existing housing stock will be demolished prior to new multi-family housing development occurring.

As with Revere, cities and towns may choose to rezone land current housing MHPs into their new multi-family zoning districts.<sup>16</sup> As MHPs generally exist as unsubsidized affordable housing with rent below median rental prices, the displacement and development of MFHs under 3a’s requirements could lead to an overall decrease of affordable housing rather than an increase.<sup>2,15</sup> This is in direct opposition to the state’s overall objective of responding to the cost of living crisis.

The creation of a multi-family zone district does not automatically condemn all existing housing stock within a zoning district into new development, rather it creates the possibility and ease for developers to develop. On the other hand, due to the developmental possibility and housing insecurity experienced by many MHPs, the risk displacement is increased for MHPs within a ½ mile or mile radius of MBTA stations.<sup>15</sup>

Of the 175 cities and towns only four towns (Berkley, Holden, Marshfield, and Middleboro) have not submitted action plans putting them at risk of losing the funds listed above.<sup>17</sup> These action plans are not yet in the public record, therefore assessing development and displacement risk to MHPs within these 175 cities and towns is based on proximity and other factors. From initial GIS assessment 30 MHPs fall within 1 mile of MBTA stations, and 12 MHPs within a ½ mile radius of MBTA stations. These 30 MHPs are clustered in two main areas across the state with a cluster in north, central Massachusetts near Fitchburg, and another near Wareham. A list of these MHPs can be found in *Table 3a of Appendix 1*.

*Visual 2: MHPs at Risk from TOD Development due to Geographic Proximity*



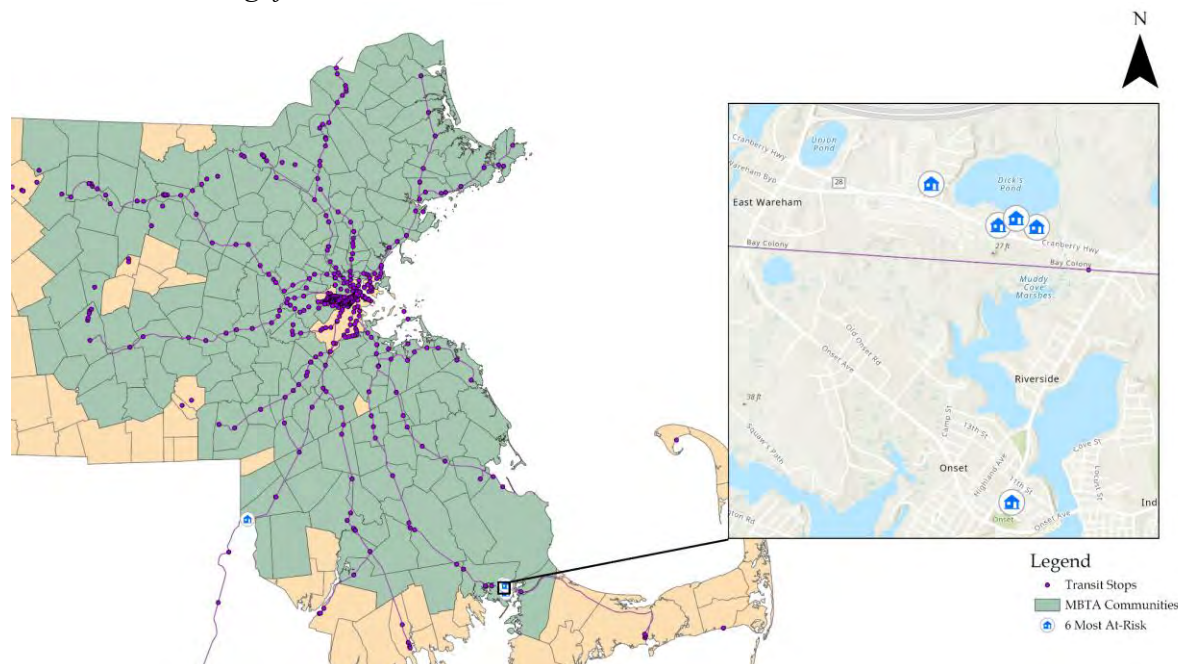
When assessing the risk of displacement to these parks current Massachusetts statute heavily influences risk. Massachusetts has one of the most protective sets of laws associated with MHP closure of any state.<sup>18</sup> Currently, if park owners wish to sell or close the park they must give residents 2 years notice. If at least half the tenants form an association, said association has “right of first refusal” meaning that the park owners must first offer to sell the park to the tenant prior to placing it on the open market. These standards, along with park rules, are overseen by the Office of the Attorney General, and the DHCD.<sup>18</sup> However in practice, as seen in Revere, these oversight systems have not been effective at stopping MHP closure and displacement.<sup>19,20</sup>

In addition to the protective standards listed above, some Cities and Towns have also implemented rent control (also known as rent stabilization) specifically for MHPs.<sup>18</sup> These rent control boards provide additional oversight at the town level on the relationship between landowner and MHP resident. This oversight and additional standards can substantially decrease risk to MHPs development. Currently only 2 of the 13 cities and towns with MHPs designated at risk have rent control boards. These are Middleborough, with two MHP’s within half mile distance of transit station, and Raynham, with one MHP’s within a half mile distance of transit station. Attleboro, with six MHP’s within half mile distance of transit station, recently attempted to pass a rent control board, however progress was halted in the state house.<sup>21</sup>

Cities and Towns can zone for multi-family housing in four general ways: “a) existing residential neighborhoods; b) the commercial areas of historic downtowns and village centers, near residences; c) modern strip mall corridors, also near neighborhoods but slightly more buffered, with fewer cross streets; and d) isolated places on municipal and metropolitan peripheries, like parcels tucked between highways, tracks, water, and nature reserves.”<sup>15</sup> These first two ways generally face the most push back with these zoning changes seen as towns and residents being concerned over “changing the character of their town” and seen as a threat to existing homeowners.<sup>15</sup> To increase the political will of zoning projects cities and towns create Multi-Family Housing zones in the final two ways; by rezoning commercial and isolated areas into multi-family zoning.<sup>15</sup> Unfortunately these two zoning possibilities are often where MHPs are often located.<sup>2</sup> Additionally, a number of the MHPs are not currently zoned residential, but rather fall within commercial zoning districts. This means that MHPs that are already zoned commercial are potentially at increased risk of rezoning and therefore of displacement and development.

Of the 12 MHPs currently within a half mile radius of MBTA stations, 6 MHPs are currently zoned commercial, increasing their risk of displacement and re-development. Effectively these MHPs have been “zoned out” of future existence. Additionally, many towns including Wareham have no zoning district where MHPs can exist or be developed in current zoning by-laws.<sup>22</sup> The current MHPs that reside are grandfathered in, however if ownership changes the likelihood of discontinuance is heightened. If municipalities choose the more politically viable option combining with municipal stigmatization for MHPs, these MHPs are at the greatest risk of displacement.

*Visual 3: Manufactured Home Parks at Increased Risk from TOD Development due to existing Commercial zoning, focus on Wareham, MA*



### Demographics At Risk

These 30 MHPs are clustered in two main areas across the state with a cluster in north, central Massachusetts near Fitchburg and another near Wareham. These clusters are on the outer bounds of the MBTA communities which mirror the geospatial trends found in Harris County. While specific demographic data are not available for these park residents, looking at the demographic information from the Census block groups containing these MHPs shows that the majority of residents are White and non-Hispanic.<sup>23</sup> They have a median household income of \$77,624, which compares to Massachusetts median household income of \$89,026. *View Table 1.*<sup>24</sup>

Census tracts containing at-risk MHPs were used to obtain demographic data on SNAP usage and Disability Status. This was the smallest level data available for this information. The data showed there are a total of 13,676 households. Around 19% of those households receive SNAP. Additionally, out of all homes that fall within a census tract containing a MHP, 31% have one or more persons with a disability. *View Table 2.*<sup>25</sup>

Comparatively, within the entire state of Massachusetts, only 12% of households receive SNAP. Out of those households, 51% have one or more persons with a disability. Overall, roughly 24% of Massachusetts households have one or more persons with a disability. This is a substantially smaller percentage compared to tracts containing MHPs. However, it is unsurprising that the State level data has a smaller percentage of households using SNAP and persons with a disability as the median household income is nearly \$12,000 higher. Overall, census tracts containing at-risk MHPs have lower median income and higher SNAP and disability status, which all indicate, or can lead to, worsened health outcomes. *View Table 2.*

## Health Outcomes Associated with Manufactured Housing

Manufactured home parks have a deep history in the U.S. and a large part of that history is restrictive zoning regulations.<sup>26</sup> The historic zoning created separation between mobile home parks and “conventional” residential zoning, leading to the development of self-contained/walled off communities.<sup>6</sup> This separation led to manufactured home parks being zoned nearer to industrial areas and highways, as well as increased the environmental hazards that residents face, and socially and spatially marginalized manufactured home park residents.<sup>2</sup> Along with these external health concerns, there are structural aspects of manufactured homes that can negatively affect residents' health. While not a comprehensive list, some of these hazards include asbestos, poor water quality,<sup>27</sup> chronic dampness (commonly referred to as mold),<sup>28</sup> and formaldehyde exposure.<sup>29</sup>

Formaldehyde is a colorless gas that is produced both anthropogenically and by natural sources.<sup>30</sup> Billions of pounds of formaldehyde are produced in the United States annually, of which approximately one-half is used in the wood products industry.<sup>31</sup> For the context of manufactured homes, it is used in the production of some plywood/particle board and resins.<sup>30</sup> Formaldehyde exposure can occur through inhalation, ingestion, or dermal exposure. When looking specifically at the exposure to “off-gassing”, inhalation is the primary exposure route of concern. The U.S. Department of Housing and Urban Development (HUD) has set standards for formaldehyde emissions in mobile homes of <0.2 parts per million (ppm) for plywood and <0.3 ppm for particle board. These standards are designed to result in an ambient air level of 0.4 ppm or less.<sup>30</sup> A study found a sample of mobile homes to be measured at 0.02 ppm to 0.8 ppm, with levels as high as 4 ppm. The primary health outcome associated with exposure is irritation of the skin, eyes, nose, and throat.<sup>30</sup> However, cancer has been also associated with chronic exposure and/or high levels of exposure. Off-gassing of formaldehyde primarily occurs for 2-5 years after installation, with individuals who spend the majority of their day inside their home at increased vulnerability to exposure.<sup>30</sup> Since formaldehyde is chemical irritant that also causes hypersensitivity reactions, it is possible that it might produce more symptoms among people with chronic respiratory illnesses and allergy problems.<sup>32</sup> Based on synthetic estimation from census data shown in *Appendix 1: Table 1 and 3*, residents of manufactured home parks are more likely to have low socioeconomic status, and have at least one disability. Therefore, the susceptibility and vulnerability of residents increases to formaldehyde exposure which can lead to long term health impacts discussed above.<sup>33</sup> Furthermore, newer homes built after 1990 are more insulated, so less air moves in and out of the homes. Reduced airflow and poor can allow formaldehyde to persist in the home as well as other hazards such as chronic dampness.

Poor ventilation can lead to worsened exposure to formaldehyde as well as chronic dampness (mold). Manufactured homes are also at an increased risk of chronic dampness, which creates the conditions for mold growth. Health effects associated with chronic dampness include asthma (new and worsened), upper and lower respiratory symptoms, eye irritation, and dermatological issues, even after potentially confounding factors such as income, social class, smoking, crowding, and unemployment are controlled for.<sup>34,35</sup> Furthermore, outside of mold, this combination of water intrusion and poor ventilation provides a nurturing environment for mites, roaches, and respiratory viruses, all of which play a role in respiratory disease development.<sup>35</sup>

MHPs also run the risk of poor water quality. A study completed on a MHP in California tested the microbial contamination of water which resulted in variable concentrations of the selected microorganisms such as E coli and salmonella. There were a few physico-chemical parameters that the researchers identified as contributing to poor water quality.<sup>27</sup> Researchers

found that 46% of the MHPs tap water samples fell outside of the pH Secondary Maximum Contaminant Levels of 6.5 to 8.5, as established by the EPA. The pH of water is important because it influences other physico-chemical parameters and the presence of metal ions. More acidic pH levels may cause corrosion of pipe metals, which can contaminate drinking water. Basic pH levels may cause pipes to form deposits.<sup>27</sup> Additionally, due to the reliance on wells that many MHPs have, microbial contamination and physico-chemical parameters are likely under-tested. This lack of testing of drinking water can lead to long-term microbial and physico-chemical contamination exposure which has health impacts. For example, heavy metals released from pipes resulting from changes in pH could have negative impacts both acute and chronic.<sup>36</sup> These can include organ damage, disruption in growth, immune system function, and increased risk of cancer.<sup>36</sup>

Another study found that living in a mobile home, and especially in a park community, is significantly and negatively correlated with water service reliability.<sup>37</sup> Many mobile home residents rely on drinking water supplies from park operators or other small private water systems. These systems may be more prone to water quality and supply issues compared to public water systems. One such hazard that has been reported at high levels in manufactured housing communities is Polyfluoroalkyl substances (PFAS).<sup>38</sup> This class of chemicals has been shown to accumulate in people's bodies and are associated with cancer, liver damage, decreased response to vaccines, immunodeficiencies, etc.<sup>39</sup>

MHPs are also more likely to use septic systems for their wastewater disposal, compared to the general population.<sup>40</sup> Pollution from malfunctioning or improperly designed septic systems can result in the contamination of drinking water supplies with pathogens and the addition of excess nitrogen and phosphorus to surface and groundwaters.<sup>40</sup> Many communities have reported severe septic issues such as sewage backing up into their homes or spilling over onto the community land.<sup>41</sup> In extreme cases, mobile home parks have been shut down by local governments due to failing septic tanks that left raw sewage standing on park grounds.<sup>40</sup> Exposure to sewage and wastewater can have negative effects on health. This grey- and black-water can contain bacteria, fungi, parasites, and viruses that can cause intestinal, lung, and other infections. Exposure to these bacteria may cause symptoms such as diarrhea, fever, cramps, headaches, and weakness. Examples of the types of bacteria and diseases carried by sewage and wastewater are *E. coli*, shigellosis, typhoid fever, salmonella, and cholera.<sup>42,43</sup>

These health outcomes are particularly concerning for residents that already live within insecure housing conditions. Despite the possibility of exposure to these hazards, many residents choose to stay in substandard housing they can afford rather than risk financial insecurity, and risk of displacement from living in more expensive but potentially less hazardous housing.

### **Health Outcomes Associated with Displacement**

Developers and city officials often use the health hazards discussed in the previous section to justify the removal of MHPs despite the associated health impacts of losing access to unsubsidized affordable housing, displacement and informal eviction.<sup>3</sup> This was seen in Revere's MHP, where researchers and lawyers were stonewalled by the City's zoning and planning boards. These boards refused to provide documentation discussing rezoning or demolition permits, confirming residents' statements that the town was actively seeking the community's removal.

There is a stigma surrounding MHP's and their residents, they are often referred to as "trailer trash".<sup>2</sup> This is maintained through zoning codes, which often prohibit parks in single-

family residential areas.<sup>3</sup> Municipal zoning laws perpetuate the stigmatization of MHP's and residents, and keep the epithet "trailer trash" alive. This encapsulates the priorities of urban policy and highlights the process of urban redevelopment which can be a process of "taking out the trash".<sup>2</sup> This mentality can lead directly to increase health and safety risk for park residents who are often offered little oversight regarding their health and safety concerns, and can lead to increased risk of park dissolution and mass displacement.

Eviction or mass displacement associated with development and gentrification has been a long-term problem for urban poor communities. Evictions have been increasing in the United States due to rising rents, rising utility costs, decreasing incomes, and decreasing investment in federal and state housing assistance.<sup>2,13</sup> This triad of housing pressures is particularly true in Massachusetts as well, as Massachusetts has the fastest growing rental rates in the nation, with rising costs heavily impacting low-income families and the primary driver of homelessness.

While there is next to no literature on the impacts of MHP closures on residents, there is a growing body of literature on the effects that eviction and displacement has on individuals. Eviction has been shown to lead to increased stress, material loss, depression, and worsening physical health outcomes in both parents and children.<sup>44</sup> The threat of eviction and displacement and the subsequent associated trauma of eviction is significantly related to high levels of material loss, negative mental health outcomes including depression, anxiety, psychological distress, and suicide, and negative physical health outcomes including poor self-reported health, high blood pressure and child maltreatment.<sup>44,45</sup> Additionally, eviction can lead to individuals and families moving into unsafe living environments. This can include substandard housing and overcrowded living conditions.<sup>46</sup> All of these also can increase risk of lasting health issues.<sup>47</sup> These health outcomes are also compounded when assessed through lenses of inequity (gender, age, class, and ethnicity); with worse health outcomes associated with those with lower socio-economic status.<sup>48,49</sup> Finally, a number of studies have shown that displacement leads to a disruption of community support and social ties, and social and economic resources; these all have been shown to cause adverse health outcomes such as psychological distress, increased stress, and hospitalizations due to drug and alcohol related issues.<sup>50-53</sup>

Eviction and displacement can also directly lead to homelessness. Due to the lower rental prices of MHs the possibility of homelessness after eviction increases. In Boston, a recent survey of individuals experiencing homelessness identified that finances were the main reason they were without a home.<sup>54</sup> This was corroborated through interviews with former residents of the Revere MHP. Many residents stated that they were now living in their cars, in either nearby parking-lots, or have returned to Mass and Cass, the central hub of homelessness services in the Greater Boston area.<sup>20</sup> Residents also echoed the financial realities found within the "Health of Boston Survey of People Experiencing Homelessness," with the majority of previous residents stating that they have been effectively priced out of the rental market.<sup>20</sup>

Homelessness has been shown to have lasting effects on physical health outcomes. Comparing self-identified measures of health in Boston has shown that unhoused individuals are over twice as likely to report that both their physical and mental health was not good for 14 or more days in the past month.<sup>54</sup> This is consistent with national data, where people experiencing homelessness have poorer overall physical health with higher rates of TB, hypertension, asthma, and diabetes. Due to a lack of consistent access to medical care, hospitalization rates are also higher among individuals experiencing homelessness.<sup>55</sup> These comparative rates both in Boston, and in national research shows that eviction, displacement, and homelessness are strongly associated with negative health outcomes. The impact of these health outcomes on residents and

communities must be factored into the risk and benefits of Transit Oriented Development, and the consequences of this statute.

### **Risk Benefit Analysis**

While cities and towns may point to the external and internal exposure to hazards and the subsequent health outcomes previously mentioned (e.g., exposure to formaldehyde leading to respiratory illness) as a reason to remove MHPs, the potential health outcomes of displacement and homelessness far outweigh the reality of living in substandard housing. Through a qualitative risk benefit analysis, and in discussion with residents displaced from Lee's Trailer Park in Revere, the comparative health impacts of people experiencing homelessness compared to housed individuals in Boston highlight the priority to maintain access to substandard housing.

Despite this qualitative risk and benefit analysis which points towards the priority of maintaining existing affordable housing in the form of manufactured home parks, outstanding questions remain regarding the relative health benefits and risk associated with living in substandard housing over experiencing homelessness.

There are a number of limitations to this analysis. While a growing field of study, the scope is still small and to fully understand the breadth of health outcomes associated with eviction requires more research. Much of the current research primarily looks at the impacts of displacement globally, and due to natural disasters. Research specifically into the health impacts of high rental prices, informal evictions, displacement due to gentrification and direct development in MHPs, and homelessness in all Massachusetts is needed.

### **Stakeholders**

In order to best assess pathways to ensure the protection of MHP residents the following list of stakeholders have been identified.

MHP Residents	Manufactured home park residents face existing housing insecurity from being both tenants and homeowners within MHPs. The implementation of multi-family housing zoning districts covering their place MHP residents at increased risk of displacement with the possibility of no financial compensation. MHP residents are also at increased risk of displacement due to their average income and disability rates exacerbating the potential health and social consequences of eviction and displacement.
MHP Owners and Investors	Existing manufactured home parks are seen as a prime location for investment and development. With relative ease of demolition, parks that have been spatially separated and "visually screened" from outside view, and low-income residents that have less access to outside resources, allow for manufactured home parks to be mass-evicted, demolished, and developed easily. This ease of development means that investors see MHPs as lucrative investments. Online platforms targeting investors highlight MHPs potential. Owners and investors seek to gain from the rezoning, displacement, and redevelopment of MHPs.

Developers	MHPs are attractive parcels to developers. They are large parcels of land that already exist for development. Additionally, with the advent of 3a and the potential for multifamily use housing and the “as of right” developers have fewer barriers for them to develop MFHs. Developers seek to gain from the rezoning, displacement, and redevelopment of MHPs.
Cities and Town Zoning and Planning Boards	Due to Massachusetts “at home rule” cities and towns have authority over zoning. <sup>56</sup> Therefore, despite TOD (section 3a) being implemented at the state level, all zoning districts and changes must go through cities and town zoning boards and town meetings in addition to being approved by DHCD. <sup>14</sup> Therefore it is within cities and towns zoning boards power to include existing MHPs in the new multifamily zoning districts.
Department of Housing and Community Development	DHCD is in charge of evaluation of the action plans that cities and towns submit. Any failure of MBTA communities to comply with the statute, DHCD will withhold funds under the Housing Choice Initiative. <sup>14</sup> DHCD will also determine whether zoning provisions allow for multi-family housing as of right consistent with the statute’s guidelines.
Massachusetts Bay Transportation Authority/Massachusetts Department of Transportation	MassDOT supports programs and projects that deliver a high return on investment. The MBTA, a division of MassDOT, acts as consultants to DHCD for the implementation and assessment of 3a. They support the assessment of city and town site plans to deem compliance with the statute. <sup>57</sup> The MBTA seeks to gain ridership from new development which increases their funding sources.
Manufactured Homes Commission	The MHC exists to provide prompt, impartial service to those affected by or concerned with matters pertaining to manufactured housing communities, this includes residents and owners. The MHC may work with DHCD to develop proposals for specific zoning standards. Finally, the MHC files an annual report with many governmental bodies about the Commission’s activities and recommendations (drafts of legislation required to effect recommendations). This report can be used to file legislation that is protective of manufactured housing communities and residents, such as rent control boards, amending Section 3A, etc. <sup>8</sup>

Executive Office of Housing and Economic Development	EOHED is marginally involved in Section 3A in regards to any failure of MBTA communities to comply with the statute. EOHED will review an MBTA community's progress in implementing its action plan prior to making an award of funds under the Massworks infrastructure program. This withholding of funds incentivizes MBTA communities to comply with the statutes guidelines and create more multi-family zoning. <sup>14</sup>
General Court of the Commonwealth of Massachusetts (State Legislature)	The MA Legislature has 200 members elected by the people of the Commonwealth. They have the power to draft legislation and approve or rewrite the Governor's budget, both of which could be used to support the needs of underserved and vulnerable populations such as Manufactured Home Parks.
Rent Control Boards	If the park is rent-controlled, the park owner must get approval from the local rent control agency before increasing rents. <sup>18</sup> Rent control is on a 5 year cycle, and rent is funneled through the Rent Control Board. This makes illegal activity, such as buying out residents from their homes, much less likely. Applicable to Middleborough (two MHP's within half mile distance of transit station), and Raynham (one MHP's within half mile distance of transit station). <sup>18</sup>
Office of the Attorney General	The Attorney General's Office is the legal arm of state. They are in charge of investigating any complaint raised by a MHP resident about conditions M.G.L. c.140, §§ 32A-32S, The Manufactured Housing Act. <sup>58</sup> Along with the Director of the Department of Housing and Community Development, the Attorney General reviews all rules issued by Manufactured Home Park owners. The Office also has the authority to enforce the Manufactured Housing Act by bringing civil actions in court. <sup>58</sup>

## References

1. List of Manufactured Home Parks in Massachusetts.
2. Sullivan E. *Manufactured Insecurity: Mobile Home Parks and Americans' Tenuous Right to Place*. University of California Press; 2018. doi:10.1525/9780520968356
3. Displaced in Place: Manufactured Housing, Mass Eviction, and the Paradox of State Intervention - Esther Sullivan, 2017. Accessed November 6, 2022. <https://journals-sagepub-com.ezproxy.bu.edu/doi/10.1177/0003122416688667>
4. Depietro A. Cheapest States To Live In for 2021. Credit Karma. Published February 9, 2022. Accessed April 19, 2023. <https://www.creditkarma.com/insights/i/cheapest-states-to-live-in>
5. HAC (Housing Assistance Council). Preserving Affordable Manufactured Home Communities In Rural America. *Housing Assistance Council*. Published online 2011. Accessed October 30, 2022. <https://ruralhome.org/reports/preserving-affordable-manufactured-home-communities-in-rural-america/>
6. Jones J. U.S. States Where Manufactured Housing Is on the Rise. Construction Coverage. Published July 7, 2020. Accessed October 30, 2022. <https://constructioncoverage.com/research/states-large-increases-in-manufactured-housing>
7. Sullivan E. Moving Out: Mapping Mobile Home Park Closures to Analyze Spatial Patterns of Low-Income Residential Displacement. *City & community*. 2017;16(3):304-329. doi:10.1111/cico.12252
8. Manufactured Homes Commission | Mass.gov. Accessed October 10, 2022. <https://www.mass.gov/service-details/manufactured-homes-commission>
9. Massachusetts Interactive Property Map. Accessed October 10, 2022. <https://massgis.maps.arcgis.com/apps/OnePane/basicviewer/index.html?appid=47689963e7bb4007961676ad9fc56ae9>
10. Helge Capital. Accessed October 10, 2022. <https://helgecapital.com/>
11. A tale of two mobile home parks: what happens when a developer wants to buy your home. Published online December 12, 2022. Accessed April 23, 2023. <https://www.wbur.org/radioboston/2022/12/12/mobile-homes-developer-wareham-revere>
12. General Law - Part I, Title VII, Chapter 40A, Section 3A. Accessed April 19, 2023. <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleVII/Chapter40A/Section3A>
13. Multi-Family Zoning Requirement for MBTA Communities | Mass.gov. Accessed April 17, 2023. <https://www.mass.gov/info-details/multi-family-zoning-requirement-for-mbta-communities>
14. Department of Housing and Community Development. Compliance Guidelines for Multi-family Zoning Districts Under Section 3A of the Zoning Act. Published online October 21, 2022. <https://www.mass.gov/doc/compliance-guidelines-for-multi-family-zoning-districts-under-section-3a-of-the-zoning-act/download>
15. Dain A. A Series of Articles about the MBTA Communities Zoning Law. Published online 2022.

<https://www.lincolnst.edu/publications/working-papers/series-articles-about-mbta-communities-zoning-law>

16. Reporter KM. Zoning change would allow hotel on Revere trailer park site near Suffolk Downs - The Boston Globe. BostonGlobe.com. Published December 26, 2013. Accessed April 17, 2023. <https://www.bostonglobe.com/metro/regionals/north/2013/12/26/zoning-change-would-allow-hotel-revere-trailer-park-site-near-suffolk-downs/wXhAA03nzwPqyET80LkzgN/story.html>
17. The Editorial Board. Campbell puts towns on notice: MBTA housing law isn't optional - The Boston Globe. BostonGlobe.com. Published March 22, 2023. Accessed April 17, 2023. <https://www.bostonglobe.com/2023/03/22/opinion/campbell-puts-towns-notice-mbta-housing-law-isnt-optional/>
18. Duke A. Chapter 16 Mobile Homes Legal Tactics. In: *Tenants' Rights in Massachusetts*. Eighth. Massachusetts Law Reform Institute; 2017. <https://www.masslegalhelp.org/housing/lt1-chapter-16-mobile-homes.pdf>
19. Big investors are buying mobile home parks — and upending the lives of residents | WBUR News. Accessed April 17, 2023. <https://www.wbur.org/news/2022/12/08/boston-mobile-home-parks-investment-firms-resident-impact>
20. Anonymous Informational Interviews with Revere Park Residents. Published online November 2022.
21. Rhodes GW. City councilors explore ways to protect mobile home park residents in Attleboro. *The Sun Chronicle*. [https://www.thesunchronicle.com/news/local\\_news/city-councilors-explore-ways-to-protect-mobile-home-park-residents-in-attleboro/article\\_5d104545-17bf-5649-a561-2809b7a3f996.html](https://www.thesunchronicle.com/news/local_news/city-councilors-explore-ways-to-protect-mobile-home-park-residents-in-attleboro/article_5d104545-17bf-5649-a561-2809b7a3f996.html). Published September 15, 2021. Accessed April 17, 2023.
22. Town of Wareham. ZONING BY-LAWS. Published online June 2021. [https://www.wareham.ma.us/sites/g/files/vyhlf5146/f/pages/june\\_12\\_2021\\_zoning\\_by-law.pdf](https://www.wareham.ma.us/sites/g/files/vyhlf5146/f/pages/june_12_2021_zoning_by-law.pdf)
23. P1: Total:— in 2020 - Census Bureau Map. Accessed April 17, 2023. [https://data.census.gov/geo/maps?map?q=massachusetts&tid=DECENNIALPL2020.P1&layer=VT\\_2020\\_150\\_00\\_PY\\_D1&mode=thematic&loc=42.0426,-71.8871,z9.0000](https://data.census.gov/geo/maps?map?q=massachusetts&tid=DECENNIALPL2020.P1&layer=VT_2020_150_00_PY_D1&mode=thematic&loc=42.0426,-71.8871,z9.0000)
24. S1903: Number—HOUSEHOLD ... in 2021 - Census Bureau Map. Accessed April 23, 2023. [https://data.census.gov/geo/maps?map?q=massachusetts+income&tid=ACSST1Y2021.S1903&layer=VT\\_2021\\_150\\_00\\_PY\\_D1&mode=thematic&loc=41.9686,-71.5438,z6.7598](https://data.census.gov/geo/maps?map?q=massachusetts+income&tid=ACSST1Y2021.S1903&layer=VT_2021_150_00_PY_D1&mode=thematic&loc=41.9686,-71.5438,z6.7598)
25. B22010: Total:—Estimate in 2021 - Census Bureau Map. Accessed April 23, 2023. [https://data.census.gov/geo/maps?map?q=massachusetts+snap+disability&tid=ACSST1Y2021.B22010&layer=VT\\_2021\\_150\\_00\\_PY\\_D1&mode=thematic&loc=41.9686,-71.5438,z6.7598](https://data.census.gov/geo/maps?map?q=massachusetts+snap+disability&tid=ACSST1Y2021.B22010&layer=VT_2021_150_00_PY_D1&mode=thematic&loc=41.9686,-71.5438,z6.7598)
26. Prosperity Now. Massachusetts Affordable Housing Need and the Role of Manufactured Housing. Published online 2017. [https://prosperitynow.org/sites/default/files/PDFs/Massachusetts\\_Metro\\_Opportunity\\_Data\\_Snapshot\\_Sept2017.pdf](https://prosperitynow.org/sites/default/files/PDFs/Massachusetts_Metro_Opportunity_Data_Snapshot_Sept2017.pdf)
27. Hile TD, Dunbar SG, Garcia NE, Sinclair RG. Assessment of tap water quality in mobile homes in the Eastern Coachella Valley, California. *PLOS Water*. 2022;1(9):e0000037. doi:10.1371/journal.pwat.0000037

28. Mold in Mobile Homes and Your Health - Mobile Home Owner Tips. MHPHOA. Accessed April 17, 2023. <https://mhphoa.com/tips/mold/health>
29. US EPA O. Facts About Formaldehyde. Published September 20, 2013. Accessed April 17, 2023. <https://www.epa.gov/formaldehyde/facts-about-formaldehyde>
30. Formaldehyde | Toxicological Profile | ATSDR. Accessed March 31, 2022. <https://wwwn-cdc-gov.ezproxy.bu.edu/TSP/ToxProfiles/ToxProfiles.aspx?id=220&tid=39>
31. Liu KS, Huang FY, Hayward SB, Wesolowski J, Sexton K. Irritant effects of formaldehyde exposure in mobile homes. *Environ Health Perspect.* 1991;94:91-94. doi:10.1289/ehp.94-1567965
32. Toxicology NRC (US) C on. *Formaldehyde - An Assessment of Its Health Effects*. National Academies Press (US); 1980. Accessed April 17, 2023. <http://www.ncbi.nlm.nih.gov/books/NBK217652/>
33. Background: Understanding the Connections Between Chronic Disease and Individual-Level Risk Factors. AAF. Accessed April 23, 2023. <https://www.americanactionforum.org/research/background-understanding-the-connections-between-chronic-disease-and-individual-level-risk-factors/>
34. Mold | CDC. Published November 17, 2022. Accessed April 23, 2023. <http://www.cdc.gov/mold/default.htm>
35. Krieger J, Higgins DL. Housing and Health: Time Again for Public Health Action. *Am J Public Health.* 2002;92(5):758-768. doi:10.2105/AJPH.92.5.758
36. Winfield S. Common Heavy Metals in Water & How to Remove Them. Water Defense. Published April 8, 2022. Accessed April 23, 2023. <https://waterdefense.org/water/contaminants/heavy-metals/>
37. Pierce G, Jimenez S. Unreliable Water Access in U.S. Mobile Homes: Evidence From the American Housing Survey. *Housing Policy Debate.* 2015;25(4):739-753. doi:10.1080/10511482.2014.999815
38. Strong J, March 4 ICD, 2022. Mobile home park water has state's highest 'forever chemicals.' Iowa Capital Dispatch. Published March 4, 2022. Accessed April 23, 2023. <https://iowacapitaldispatch.com/2022/03/04/mobile-home-park-water-has-states-highest-forever-chemicals/>
39. Potential health effects of PFAS chemicals | ATSDR. Published September 9, 2022. Accessed October 23, 2022. <http://www.atsdr.cdc.gov/pfas/health-effects/index.html>
40. U.S. Environmental Protection Agency. Indicator Reference Sheet – Mobile Home Parks. Published online March 6, 2022. <https://www.epa.gov/system/files/documents/2022-03/mobile-home-park-indicator-reference-sheet-20220306.pdf>
41. Mobile home community residents speak of severe septic issues, other problems under Impact Communities | News | deltacountyindependent.com. Accessed April 23, 2023. [https://www.deltacountyindependent.com/news/mobile-home-community-residents-speak-of-severe-septic-issues-other-problems-under-impact-communities/article\\_889feb66-db85-11eb-bdee-ff5fb4ab2b26.html](https://www.deltacountyindependent.com/news/mobile-home-community-residents-speak-of-severe-septic-issues-other-problems-under-impact-communities/article_889feb66-db85-11eb-bdee-ff5fb4ab2b26.html)
42. Delaware Division of Public Health. Sewage: Frequently Asked Questions.

<https://dhss.delaware.gov/dph/files/sewagefaq.pdf>

43. Health EP. Diseases Involving Sewage. Environmental Public Health. Published April 5, 2021. Accessed April 23, 2023. <https://www.in.gov/health/eph/onsite-sewage-systems-program/diseases-involving-sewage/>
44. Vásquez-Vera H, Palència L, Magna I, Mena C, Neira J, Borrell C. The threat of home eviction and its effects on health through the equity lens: A systematic review. *Social Science & Medicine*. 2017;175:199-208. doi:10.1016/j.socscimed.2017.01.010
45. Desmond M, Kimbro RT. Eviction's Fallout: Housing, Hardship, and Health. *Social Forces*. 2015;94(1):295-324. doi:10.1093/sf/sov044
46. Desmond M, Gershenson C, Kiviat B. Forced relocation and residential instability among urban renters. *Social Service Review*. 2015;89(2):227-262. doi:10.1086/681091
47. Shaw M. Housing and public health. *Annual review of public health*. 2004;25(1):397-418. doi:10.1146/annurev.publhealth.25.101802.123036
48. Mari-Dell'Olmo M, Novoa AM, Camprubí L, et al. Housing Policies and Health Inequalities. *Int J Health Serv*. 2017;47(2):207-232. doi:10.1177/0020731416684292
49. Novoa AM, Bosch J, Díaz F, Malmusi D, Darnell M, Trilla C. [Impact of the crisis on the relationship between housing and health. Policies for good practice to reduce inequalities in health related to housing conditions]. *Gac Sanit*. 2014;28 Suppl 1:44-50. doi:10.1016/j.gaceta.2014.02.018
50. CDC - Healthy Places - Health Effects of Gentrification. Accessed April 17, 2023. <https://www.cdc.gov/healthyplaces/healthtopics/gentrification.htm>
51. Freeman L, Braconi F. Gentrification and Displacement New York City in the 1990s. *Journal of the American Planning Association*. 2004;70(1):39-52. doi:10.1080/01944360408976337
52. Keene DE, Geronimus AT. "Weathering" HOPE VI: The Importance of Evaluating the Population Health Impact of Public Housing Demolition and Displacement. *Journal of urban health*. 2011;88(3):417-435. doi:10.1007/s11524-011-9582-5
53. Lim S, Chan PY, Walters S, Culp G, Huynh M, Gould LH. Impact of residential displacement on healthcare access and mental health among original residents of gentrifying neighborhoods in New York City. *PLOS ONE*. 2017;12(12):e0190139. doi:10.1371/journal.pone.0190139
54. Boston Public Health Commission. Health of Boston Survey of People Experiencing Homelessness. Published online 2023. [https://www.boston.gov/sites/default/files/file/2023/04/HOB\\_SpecRp\\_Unhoused\\_Apr2023\\_0.pdf](https://www.boston.gov/sites/default/files/file/2023/04/HOB_SpecRp_Unhoused_Apr2023_0.pdf)
55. Health and Homelessness. Accessed April 17, 2023. <https://www.apa.org/pi/ses/resources/publications/homelessness-health>
56. Department of Revenue. What is Home Rule? <https://www.mass.gov/doc/home-rule-0/download>
57. Massachusetts Department of Transportation | Mass.gov. Accessed April 17, 2023. <https://www.mass.gov/orgs/massachusetts-department-of-transportation>

58. M.G.L. c. Chapter 140. Accessed April 23, 2023.  
<https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXX/Chapter140>

### Appendix 1: Tables

*Table 1: Manufactured Home Park Resident Break Down by Race*

	Block Groups containing at Risk MHPs (22)	Massachusetts	
	%	N	%
Total Population		7,029,917	100%
<b>Race</b>			
Hispanic	10.6%	887,685	12.6%
Non-Hispanic	89.3%	6,142,232	87%
<i>White</i>	82.2%	4,748,897	67.5%
<i>Black</i>	3.6%	457,055	6.5%
<i>American Indian/Alaskan Native</i>	0.2%	9,387	0.1%
<i>Asian</i>	2.2%	504,900	7.2%
<i>Pacific Islander</i>	0%	1,607	0%
<i>Other</i>	1.6%	92,108	1.3%
<i>Two or more Races</i>	0.5%	346,871	0.3%
<b>Income</b>			
Median Household Income	\$77,624	\$89,026	

*Table 2. Households in Census Tracts Containing MHP's That Receive SNAP Benefits & Have One or More Person in the Home with A Disability*

	Total Households in Census Tracts Containing MHPs & SNAP Recipients		Massachusetts Homes That Receive SNAP	
	Total	%	Total	%
Homes w SNAP	2,577	19%	331,259	12%
Homes w/o SNAP	11,099	81%	2,383,189	88%
Total	13,676		2,714,448	
SNAP & Disability Status			SNAP & Disability Status	
Disability	1,369	53%	167,589	51%
No Disability	1,208	47%	163,670	49%
Total	2,577		331,259	
No Snap & Disability Status			No SNAP & Disability Status	
Disability	2,876	26%	478,930	20%
No Disability	8,223	74%	1,904,259	80%
Total	11,099		2,383,189	
Disability Status			Disability Status	
Total	4,245	31%	646,519	24%

Table 3a: At-Risk Manufactured Home Parks in Massachusetts

Key:

	Within 0.5 miles, zoned commercially
	Within 0.5 miles
	Within 1 mile
*	Rent Stabilization Board
**	Resident Owned Community

Town	Park Name	Address
Attleboro	Case Mobile Home Estates	44 Colvin Street
Attleboro	Eastland Park	1346 Newport Avenue
Attleboro	Liberty Estates	Liberty Drive
Attleboro	Red Oak Mobile Village	460 Collins Street
Attleboro	Tripp Mobile Home Park	548 Kenyon Avenue
Ayer	Hillside	25 Groton School Road
Ayer	Pine Knoll	11 Groton School Road
Fitchburg	Fitchburg Mobile Home Park	276 Lunenburg Street
Gloucester	Little River Campground	4 Stanwood Point
Hingham	Pocohontas Trailer Park	170 Rockland Street
Lakeville	Twin Coach Estates	Haskell Circle
Leominster	Dunwoody Mobile Home Park	602 North Main Street
Lunenburg	Whalom Mobile Home Village, Inc.	165 Summer Street
Middleborough*	Edgeway Mobile Home Park	Lyn Lane and Wesley Circle
Middleborough*	Hillcrest Mobile Home Community	79 East Grove Street
Raynham*	Shady Acres Mobile Home Park	1540 Broadway
Revere	Lee's Trailer Park	418 Revere Beach Pathway
Shirley	Briarwood Trailer Park	83 Front Street
Shirley	Wayside Trailer Park	47 Wayside Park, Shirley, MA
Wareham	Garden Homes Estates East	3040 Cranberry Highway
Wareham	Garden Homes Estates North	2750 Cranberry Highway
Wareham	Garden Homes Estates Pines	2750B Cranberry Highway
Wareham	Garden Homes Estates South	3132 Cranberry Highway
Wareham**	Lakeside Mobile Home Park	3030 Cranberry Highway
Wareham**	Mogan's Mobile Home Park, Inc.	3012 Cranberry Hwy, East Wareham, MA 02538
Wareham	Onset Beach Resort Mobile Home Park	32 Kins Ct, Onset, MA 02558
Wareham	Red Wing Estates	2900 Cranberry Highway
Wareham	Royal Crest	2340 Cranberry Highway
Wareham	Silver Lake Mobile Home Park	3024 Cranberry Highway
Wareham	Swifts Beach Mobile Home Park	8 Swifts Beach Road

Table 3b: All Manufactured Home Parks in Massachusetts

Key:

	Within 0.5 miles, zoned commercially
	Within 0.5 miles
	Within 1 mile
	Updated Park Address/Update Needed

Town	Park Name	Address
Acushnet	Acushnet Mobile Homes	922 Middle Road
Acushnet	Bay State Mobile Home Park and Sales	43 South Main Street
Acushnet	Brookside Mobile Home Park	1049 Main Street
Adams	Pinnacle Park	11 A Pinnacle Drive
Ashby	The Pines Campground	39 Davis Road
Athol	Millers Woods	739 Daniel Shays Highway
Athol	River Bend Woods	739 Daniel Shays Highway
Attleboro	Birchwood Mobile Home Park	1340 County St
Attleboro	Case Mobile Home Estates	44 Colvin Street
Attleboro	Eastland Park	1346 Newport Avenue
Attleboro	Liberty Estates	Liberty Drive
Attleboro	Oak Hill	1003 Oakhill Avenue
Attleboro	Red Oak Mobile Village	460 Collins Street
Attleboro	Sand Castle Mobile Home Park	11 Drawbridge Lane
Attleboro	Tripp Mobile Home Park	548 Kenyon Avenue
Auburn	American Mobile Home Park	751 Washington Street
Auburn	Mara Vista Trailer Park	131 Washington Street
Auburn	Marty's Mobile Home Park	3 Washington Street
Auburn	Mobile Home Service Center, Inc.	17 Washington Street
Auburn	Oak Hill Manufactured Housing Community	113 Washington Street
Auburn	Pleasant Trailer Park	496 Washington Street
Auburn	Southwest Retirement Community	5 Washington Street
Auburn	Whispering Pine Estates	47 Washington Street
Auburn	Winbrook Acres Cooperative Cooperation	120 Washington Street
Ayer	Hillside	25 Groton School Road
Ayer	Pine Knoll	11 Groton School Road
Barre	Water Wheel Village	Route 122, P.O. Box 339
Blechertown	Pine Valley Plantation	281 Chauncy Walker
Blechertown	Sportshaven Mobile Home Park	370 Mill Valley Road
Bernardston	Country Estates	75 South Street
Billerica	Lakeside Mobile Home Court	54 Oak Street
Boston	Boston Trailer Park	1515 VFW Parkway

Bourne	Pocasset Mobile Home Park	117-149 Barlows Landing Road
Bridgewater	High Pond Estates	10 High Pond Drive
Bridgewater	Stone Meadow	9 Stone Meadow Drive
Brimfield	Meadowbrook Acres	Palmer Road (9-B-5)
Brockton	Skyview Village	2013 Main Street
Brookfield	Brookfield Meadows	91 Town Farm Road
Brookfield	Nanatomqua Cooperative Corp	3 Nanatomqua Drive
Brookfield	Wagon Wheel Cooperative Corp	234 Rice Corner Road/13 Buckboard Pass
Carver	Cranberry Village	75 Cranberry Road
Carver	Meadow Woods	32 Melanie Lane
Carver	Pine Tree Village	75 Cranberry Road
Carver	South Meadow Village	36-10 South Meadow Village
Carver	Waterview Village	Silva Street
Charlton	Mobile Home Park	376 Worcester Road
Charlton	Trucker Trailer Park	74 Sturbridge Road
Chelmsford	Chelmsford Mobile Home Park	270 Littleton Road
Cheshire	Kitchen Brook	S. Street
Cheshire	Pine Valley	110 Dublin Road
Chicopee	Bluebird Acres	Old Fuller Road Exit
Chicopee	Gill Mobile Homes	1760 Westover Road
Chicopee	Harmony Homes	735 Memorial Drive
Chicopee	Holiday Circle	Sheridan Street
Chicopee	Holiday Park	705 Memorial Drive
Chicopee	Kontiki Village	Kontiki Circle off Memorial Drive
Chicopee	Liberty (Knollwood Estates)	95-142 Edbert Street
Chicopee	Sunrise Ridge Estates	Sheridan Street via Holiday Circle Park
Chicopee	Westover Trailer Park	Granby Road off Memorial Drive
Dalton	Victoria Villa	Park Terrace
Danvers	Danvers Trailer Park	96-98 Newbury Street
Danvers	Glen Mobile Home Park	200 North Street
Danvers	Shady Oaks Mobile Home Park	103 Newbury Street
Danvers	Skyview Park	466 Newbury Street
Dartmouth	Tidee Acres	79 Criss Riad
East Bridgewater	Meadowbrook	691 Union Street
Easton	Easton Mobile Home Community	305 Turnpike
Erving	Fairlane Mobile Homes	Old State Road
Fitchburg	Fitchburg Mobile Home Park	276 Lunenburg Street
Fitchburg	Woodland Mobile Home Park	1341 Rindge Road
Foxborough	Norfolk Park	131 Washington Street
Gardner	Rodfers Family Holdings, Inc	33 Waterview Drive

Gloucester	Cape Ann Camp Site	80 Atlantic Street
Gloucester	Little River Campground	4 Stanwood Point
Greenfield	Greenfield Country Estates Corp. Inc.	42 Adams Road
Halifax	Halifax Mobile Home Park	50 Sycamore Drive
Hatfield	Oakledge Mobil Park	139-143 West Street
Hingham	Pocohontas Trailer Park	170 Rockland Street
Hinsdale	Bissinville Estates	1109 Washington Road
Hinsdale	Country Road Coop. Inc.	70 Watson Road
Holbrook	Magons Trailer Park	166 Pond Street
Hudson	Meacowbrook	2 Rebecca Avenue
Kingston	Conifer Green	South Street
Kingston	Town and Country Estate	Summer Street
Lakeville	Twin Coach Estates	Haskell Circle
Lanesborough	Nonamie	514 South Main Street
Lee	Allen's Mobile Home Park	130 Water Street
Lee	Twin Spruce	155 Water Street
Lenox	Berkshire Mobile Home Park	405 Pittsfield
Leominster	Dunwoody Mobile Home Park	602 North Main Street
Leominster	Meadow Acres	556 Central Street
Leominster	Whitehouse Park	1237 Central Street
Littleton	Littleton Motor Court	Route 2a
Ludlow	Circle Drive Trailer Park	89 West Avenue
Ludlow	Mountain View Mobile Home Park	229 Millet Street
Ludlow	Scott's Mobile Home Park	350 West Street
Lunenburg	Fairlane Mobile Home Park	2005 Mass. Avenue
Lunenburg	Medow Woods Mobile Home Park	1790 Mass. Avenue
Lunenburg	Whalom Mobile Home Village, Inc.	165 Summer Street
Malden	Town Line Estates	685 Broadway
Marlborough	Gulbankian's	1038 Broadmeadow Road
Marlborough	Jo-Len Village, Inc.	15 Colton Lane
Marlborough	Post Road Mobile Home Park	181 Boston Post - E
Mashpee	Lakeside Trailer Park	300 Nathan Ellis Highway
Mashpee	Otis Trailer Village/Johns Pond Campground	2 Back Road
Merrimac	Carriage Town Park	104 West Main Street
Merrimac	North Shore Community Mobile Home Park	107 East Main Street
Middleborough	Edgeway Mobile Home Park	Lyn Lane and Wesley Circle
Middleborough	Hillcrest Mobile Home Community	79 East Grove Street
Middleborough	Oak Point Mobile Home Park	200 Oak Point Drive
Monson	Rays Mobile Home Park	268 Palmer Road
Montague	Airport Mobile Home Park	259 Millers Falls Road
Montague	Laurel Park Realty Trust	6 Laurel Lane
New Bedford	Treasure Trailer Park	1044 Phillips Road

New Bedford	Tripps Mobile Home Park	2981 Acushnet Avenue
North Adams	Chieftain Realty-Willow Lane	1095 Mohawk Trail, Box 764
North Adams	Rock Manor Mobilehome Park	1100 Mohawk Trail, P.O. Box 1061
North Adams	Wheel Estates MHC	1588 S. Church Street, P.O. Box 780
North Attleborough	Guertin's Mobile Home Gardens	300 E. Washington Street
North Attleborough	In-Town Mobile Home Park	633 E. Washington Street
North Attleborough	Riverview Mobile Home Park	637 S. Washington Street
North Attleborough	Rustic Pines Estates	43 Woodchip Square
North Attleborough	Wamsutta Mobile Home Village	130 E. Washington Street
North Attleborough	Whisper Pines Mobile Home Park, Inc.	1174 S. Washington Street
North Reading	Lily Starlight Realty Trust	103 Main Street
North Reading	Perry's Trailer Park	142 Main Street
Norton	Norton Estates Co-op Corp.	250 Mansfield Avenue
Norton	Norton Mobile Home Estate Realty Trust	157 Mansfield Avenue
Norton	Willowcrest Estates	27 Smith Street
Norwell	Helen's	447 Washington Street
Norwell	The Glen	214 Washington Street
Orange	Brookside Mobile Homes Park Co-Op	12 Columbia Avenue
Orange	Leisure Woods Estates, Inc	519 East River Street
Orange	Sheridan's Mobile Home Park	76 Daniel Shays Highway
Otis	Bartow's Mobile Home Park	1514 Monterey Road
Oxford	Oxford Adult Trailer Park	9 Leicester Street
Oxford	Skyline Trailer Park	10 Southbridge Road (Rte 20)
Palmer	Quaboag Valley Co-Op	63 Quaboag Trail
Peabody	Family Estates Cooperative	154 Newbury Street
Peabody	Haven Circle Cooperative	41 Pine Street
Peabody	Little Trailer Park	165 Newbury Street
Peabody	Mac's Park	176 Newbury Street
Peabody	Newbury Trailer Park	259 Newbury Street
Peabody	Oak Ledge Heights Co-Op	161 Newbury Street
Peabody	Park Place Mobile Home	266 Newbury Street
Peabody	Peabody Mobile Estates	286 Newbury Street
Peabody	Peabody Mobile Home Park	252 Newbury Street
Peabody	Pine Grove	261 Newbury Street
Peabody	Red Hill Trust	251 Newbury Street
Peabody	Whispering Meadows	278 Newbury Street
Pelham	Amherst Road MHP	21 Amherst Road
Pepperell	Clark's Retirement Homes Park	4 Mason Street

Pepperell	Green Acres Mobile Home Park	38 River Road
Pepperell	Suburban Village Mobile Home Park	18 Maple Street
Pittsfield	Allendale Pines Mobile Home Park	245 Cheshire Road
Pittsfield	Brownie's Mobile Court	11 Nottingham Drive
Pittsfield	Lake Onota Village	Valentine Road
Plainville	Higgins Mobile Homes - Brookside Village	160 Washington Street
Plainville	Higgins Mobile Homes - Sunset Acres	45 Washington Street
Plainville	Killarny Estates	18 Taunton Street
Plymouth	Long Pond Village Mobile Homes	54 Headlands Drive
Plymouth	Mayflower Mobile Estates	Minuteman Lane
Plymouth	Pinehurst Mobile Home Village	173 South Meadow Road
Plymouth	Plimouth Commons Co-op Corp.	1-A Community Drive
Plymouth	Plymouth Mobile Estates Co-op Corp	Pilgrim Trail
Plymouth	Village at Squirrel Run	30 Carver Road
Plymouth	WestWood Vilalge	Willowbend Boulevard
Raynham	Shady Acres Mobile Home Park	1540 Broadway
Raynham	The Pine Hill Estates	272 Hill Street
Revere	Lee's Trailer Park	418 Revere Beach Pathway
Rockland	Hillcreast	401 Beech Street
Rockland	Leisurewoods	31 Leisurewoods Drive
Russell	Prime-Lo Development, Inc.	51 Park Avenue
Salisbury	Carmel Realty Trust	114 Lafayette Road
Salisbury	Heritage Park Homeowners Coop	194 Lafayette Road
Sandwich	Dunroamin Trailer Park	5 John Ewer Road, Route 3
Saugus	Boulder Mobile Home Park	1591 Broadway
Saugus	Luongo Realty Trust	5 Hawkes Street
Saugus	Orlandella Mobile Home Park	104 Broadway
Saugus	Saugus Mobile Park	846 Broadway
Shirley	Acme Trailer Park	154 Great Road
Shirley	Briarwood Trailer Park	83 Front Street
Shirley	Red Oakes	Kittredge Road
Shirley	Wayside Trailer Park	47 Wayside Park, Shirley, MA
Shrewsbury	Edgemere Trailer Park	151 Hartford Turnpike
Springfield	Birchambend Mobile Home	Grochmal Avenue
Springfield	Boston Road Mobile Home	1157 Boston Road
Springfield	Eastwood Estates	Lamplighter Lane and Contessa Avenue
Springfield	Springfield Mobile Park	Wollaston & Shumway Street
Stockbridge	Berkshire Mobile Home Park	405 Pittsfield

Stockbridge	Brookside Mobile Home Park	Washington Mountain Road
Stockbridge	Tiwn Spruce	155 Water Street
Stoughton	Kelley's Trailer Park	1156 Park Street
Sturbridge	Bob's Retirement Home Park	365 Main Street
Sturbridge	Cedar Lake Mobile Home Park	8 Birch Street
Sturbridge	Sturbridge Retirement Community	1 Kelly Road
Taunton	Colonial Estates	6 Minute Man Road
Taunton	Leisure Woods at Taunton	50 Highland Street
Taunton	Oak Hill Mobile Home Park	97 Cypress Road
Taunton	Radante Estates	200 Norton Avenue
Taunton	Rocky Knoll Estates	193 Tremont Street
Taunton	Willow Terrace	22 Waverly Street
Templeton	Meadow Lane Trailer Park	Patriots Road
Templeton	Willow Trailer Park	Patriots Road
Tewksbury	Lakeside Mobile Home Court, Inc.	54 Oak Street
Tyngsborough	Berry's Grove Campground, Inc.	35 David Street
Wales	Brookside Village	Stafford Road
Ware	Oakwood Mobile Home Park	51 Monson Turnpike Road
Ware	Pond Brook Park	221 Upper North Street, STE 1
Wareham	Garden Homes Estates East	3040 Cranberry Highway
Wareham	Garden Homes Estates North	2750 Cranberry Highway
Wareham	Garden Homes Estates Pines	2750B Cranberry Highway
Wareham	Garden Homes Estates South	3132 Cranberry Highway
Wareham	Great Hill Estates Retirement Community	2400 Cranberry Highway
Wareham	GreenTree Estates	9 Charlotte Furnace Road
Wareham	Holly Heights Cooperative, Inc.	9 Judith Street
Wareham	Lakeside Mobile Home Park	3030 Cranberry Highway
Wareham	Mogan's Mobile Home Park, Inc.	3012 Cranberry Hwy, East Wareham, MA 02538
Wareham	Onset Beach Resort Mobile Home Park	32 Kins Ct, Onset, MA 02558
Wareham	Red Wing Estates	2900 Cranberry Highway
Wareham	Royal Crest	2340 Cranberry Highway
Wareham	Siesta Village Mobile Home Park	10 Charlotte Furnace Road
Wareham	Silver Lake Mobile Home Park	3024 Cranberry Highway
Wareham	Swifts Beach Mobile Home Park	8 Swifts Beach Road
Warren	Evergreen Mobile Home Park, Route 19	P.O. Box 1175

Warren	Heritage Mobile Home Park	Unknown
Webster	Woods Grove Realty	Ash Street
Wellfleet	Harborside Village	200 Rudys Way
Wellfleet	Massasoit Hills Trailer Park	West Road
Wendell	Mountain Laurel Mobile Court	51 New Salem Road
West Bridgewater	Beacon Park Realty Trust	855 N. Main Street
West Bridgewater	Matfield Woods Mobile Home Park	324 W. Center Street
West Brookfield	Madden Estates	Madden Road
West Springfield	Kaufco-Bh, Inc.	Brush Hill Avenue
West Stockbridge	Gennari's Mill Pond Trailer Park	Albany Road, Route 41
Westborough	Wayside Mobile Home Park	165 Turnpike Road
Westfield	Arbor Mobile Home Park	Klondike Avenue
Westfield	Hampden Village	Root Road
Westfield	Henry's Mobilehome Park	Southampton Road
Westfield	Liberty Manor	Russellville Road
Westfield	Oaks Mobilehome Park	404 Southwick Road
Westfield	Riverbend	189 Springfield Road
Weymouth	Nob Hill Estates	689 Washington Street
Williamstown	Pines Lodge	Cummings Avenue
Williamstown	The Spruces	60 Main Street
Winchendon	Glenwood Mobile Home Park	142 Glenallen Street
Winchendon	Jacobs Landing - Phase II	142 Glenallen Street
Worcester	End of the Lane, Inc	1 Rose Lane
Worcester	Marty's Mobile Home Park, Inc.	557 Southwest Cutoff
Worcester	Southwest Manufactured Housing Community	557 Southwest Cutoff
Yarmouth	Bass River Trailer Park	698 Willow Street

## Appendix 2: Photos of Previous Revere, MA Manufactured Home Park

