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Single-Family

# Identifying the Opportunities to Expand Manufactured Housing

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## I. INTRODUCTION

Access to affordable housing and equitable opportunities to build wealth through sustainable homeownership are major, growing concerns in the United States. Housing is becoming less and less affordable in the United States, especially among low-income homeowners and low-, very low-, and extremely low-income renters (McClure, 2019; Ritcher et al., 2019). As evidence of the challenge, the Freddie Mac House Price Index showed an increase of more than 19% between July 2020 and July 2021; Freddie Mac's Economic & Housing Research Group forecast house price growth of nearly 17% for 2021 overall.

The affordability problem is uneven across the United States and more pronounced in metropolitan areas, which already suffer from tight supply, higher demand, and scarcity of land (Anacker, 2019). In fact, 99 of the 100 largest metropolitan areas experienced a double-digit rise in home prices between third quarter 2020 and third quarter 2021, according to the Federal Housing Finance Agency's (FHFA's) Top 100 Metro Areas Ranking. Affordability issues paired with economic disparities impacting communities of color, rural America, and other marginalized groups constitute a major barrier to housing stability and closing the racial homeownership and wealth gap.

Manufactured homes cost on average about half as much as site-built homes (excluding the land) and offer an attractive, energy-efficient, resilient housing option. Yet they compose only around 7.5% of existing and 9% of new U.S. homes. A major reason for the low percentage: state and local zoning regulations – often based on misconceptions – that constrain manufactured housing's role in the housing market. The potential for manufactured housing to play a bigger role in filling the affordable housing gap has taken center stage over the last few years.

To address industry requests for information that could help in identifying significant opportunities for market growth and transformation, Freddie Mac performed a quantitative analysis of data drawn from a variety of the best-available sources to provide a holistic view of the market. The results could assist industry participants in designing strategies and tactics to advance the acceptance, placement, and ownership of manufactured housing in metropolitan areas.

Key findings:

- More stringent zoning is associated with a lower share of manufactured home (MH) loans as a percentage of total loans.
- The stricter the regulation is around residential land use in a state, the fewer MH units shipped to that state.
- The areas with the most shipments of manufactured homes are in the West, while areas of opportunity are most prevalent in the Midwest.
- Jurisdictions considered "MH friendly" based on a framework that we developed include many individuals who appear able to qualify for mortgages and could benefit from more affordable homeownership options. Close to 25 million people living in MH-friendly jurisdictions are "mortgage ready" today. If zoning were less stringent, more than a million more individuals in those jurisdictions might be able to achieve homeownership with manufactured housing.
- When compared to recent buyers of site-built homes, MH-friendly jurisdictions contain a larger share of Black and Hispanic potential homebuyers.

# II. THE IMPACT OF ZONING ON MANUFACTURED HOUSING

Zoning regulations affect the usage, availability, and acceptance of manufactured homes. They may be implemented for various reasons, but often have the effect of partially or completely constraining manufactured home placements. States have zoning authority and set the tone. However, many states delegate some zoning authority to local governments through enabling acts.

State and local governments use zoning and other regulations to specify where, when, and how many manufactured homes are placed as well as what they look like and the infrastructure required to support them. The extent of regulation spans a wide range and varies by locality. Some states leave zoning decisions to the local jurisdictions and offer no regulatory framework. Others, for example, may require that building standards – including but not limited to design features, minimum square footage, and roof pitch – apply equally to manufactured and site-built homes. Except for some *CrossMod™ homes*, it is unlikely that any manufactured home will meet the criteria. Still other states may allow manufactured homes of any design but only in defined areas – for example, in existing manufactured housing communities. Deep-seated *perceptions* of manufactured housing also significantly influence the level of acceptance and zoning decisions within a jurisdiction.

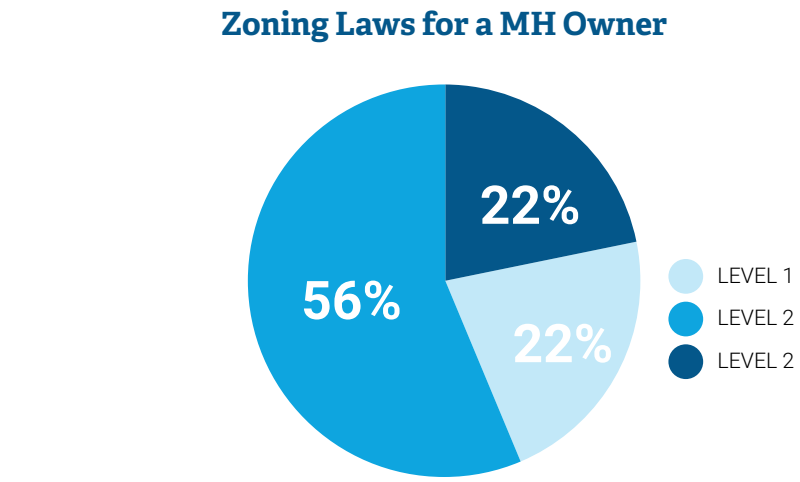
Freddie Mac conducted an analysis to better understand and quantify the effect of zoning on manufactured housing. To produce a consolidated dataset, we accessed data from the 2020 Home Mortgage Disclosure Act (HMDA), the 2019 National Longitudinal Land Use Survey (NLLUS), the Manufactured Housing Institute (MHI), the 2018 Wharton Residential Land Use Regulatory Index survey (WRLURI), and the State Inclusionary Index (SII) compiled by the Virginia Polytechnic Institute and State University (Virginia Tech) for the U.S. Department of Housing and Urban Development (HUD). From these sources, a total of 825 jurisdictions across 32 states were matched based on *Federal Information Processing System (FIPS) codes*, which provide a standardized system for identifying various levels of geography (states, counties, core-based statistical areas (CBSAs), places, and more). The consolidated dataset contains information on the stringency of regulation around residential land use, lot size requirements, density and supply restrictions, existence of affordable housing programs, designation of MH as real property, local courts' involvement in the passing of zoning laws, and much more. Go to Appendix A for additional details.

The 825 jurisdictions included in our consolidated dataset are categorized based on the state's manufactured housing zoning laws, as shown in Exhibit 1.

- Level 1 jurisdictions prohibit outright bans and must allow MH in some area(s) within the city. There are 181 (22%) of such jurisdictions in the data.
- Level 2 jurisdictions allow MH but could impose the same building standards to both MH and site-built homes. The majority of jurisdictions (56%) fall into this category.
- Level 3 jurisdictions are in states with no state laws on zoning preemption for MH owners which could mean that the zoning is unknown or more restrictive in these jurisdictions. There are 180 (22%) jurisdictions in Level 3.

**Note** that no state requires jurisdictions to allow manufactured homes in all single-family residential neighborhoods based solely on being built to the national HUD Manufactured Housing Construction and Safety Standards, commonly called the HUD Code.

## Exhibit 1: Most Jurisdictions Are Allowed to Impose Regulations to Limit MH




**Source:** Freddie Mac's calculations using 2021 data from the Manufactured Housing Institute.
**Level** 1: Jurisdiction is required to prohibit outright bans and must allow for MH in some are within the city (n=181).
**Level** 2: Jurisdiction is prohibited from outright banning MH but is allowed to impose the same building standards to both manufactured and site-built homes (n=464).
**Level** 3: No state laws on zoning preemption for MH owners (n=180).

In addition to any state laws regarding manufactured housing, many local jurisdictions enact additional regulations. These can take a wide variety of shapes. Most commonly, they relate to minimum lot-size requirements, or density restrictions; 95% of the jurisdictions in the consolidated dataset apply these additional regulations. Minimums may vary within a jurisdiction. For example, the smallest required minimum may be half an acre near an industrial part of the city and the largest minimum may be two acres in a residential area. As shown in Exhibit 2, more than 38% of jurisdictions surveyed have largest minimum lot-size requirements up to a half-acre and 30% have largest-minimum requirements between a half-acre and two acres. In about 27% of jurisdictions, the largest minimum is more than two acres. The added cost of the land moves affordable homeownership beyond the reach of many people who otherwise could afford to own manufactured homes.

## Exhibit 2: 57% of Jurisdictions Require Lot Sizes of More than Half an Acre

| Density Restrictions Index (DRI) | Number of Jurisdictions | Percent |
|---|---|---|
| 0 | 40 | 5.04 |
| 1 | 305 | 38.41 |
| 2 | 127 | 15.99 |
| 3 | 111 | 13.98 |
| 4 | 211 | 26.57 |
| **Total** | **794** | **100** |

**Source:** Freddie Mac's calculations using 2018 WRLURI survey.

**Key:**
0 = no minimum lot size regulation anywhere in the jurisdiction
1 = a minimum no larger than 0.5 acres
2 = a minimum, with the largest from 0.5-1.0 acres
3 = a minimum, with the largest from 1.0-2.0 acres
4 = a minimum, with the largest more than 2.0 acres

**Note:** DRI is missing data points for some jurisdictions in the consolidated dataset.

Another way to constrain manufactured housing is through caps on the supply of new housing through placing limits on building permits, construction, or number of dwellings and units. Typically when demand outstrips supply, prices rise. This alone could exacerbate affordability issues, but also could drive builders and developers to choose placing site-built homes in those areas, which generally sell for higher prices than manufactured homes. Restrictions on supply are measured by the Supply Restriction Index (SRI). This index reflects the extent to which there are explicit caps on the supply of new housing and comes from 2018 WRLURI. However, as shown in Exhibit 3, 94% of jurisdictions in our dataset do not place caps on new housing supply.

## Exhibit 3: Most Jurisdictions Do Not Place Caps on New Housing Supply

| Supply Restriction Index (SRI) | Number of Jurisdictions | Percent |
|---|---|---|
| 0 | 771 | 93.91 |
| 1 | 14 | 1.71 |
| 2 | 17 | 2.07 |
| 3 | 4 | 0.49 |
| 4 | 10 | 1.22 |
| 6 | 5 | 0.61 |
| **Total** | **821** | **100** |

**Source:** Freddie Mac's calculations using the 2018 Wharton Residential Land Use Regulatory Index survey

**Note:** SRI is missing data points for some jurisdictions in the consolidated dataset.

**Note:** A SRI score of 0 indicates no cap on new housing supply.

While some states may use zoning to discourage manufactured housing, some also encourage this housing option in their jurisdictions. For example, they may designate MH as real property rather than personal property (chattel); through the titling policy. Accordingly, homeowners may take advantage of mortgage financing, which offers longer loan terms and lower interest rates, and may allow them to qualify for federal and state income tax deductions.

## To What Extent Does Zoning Affect Manufactured Housing?

To quantify the relationship between zoning and manufactured housing in a jurisdiction, Freddie Mac used various analytical techniques and tools to gain insight into where zoning most affects placement of manufactured homes and by how much. We also analyzed to which states manufactured homes are being shipped and where they are being financed.

Our analysis of 2020 Home Mortgage Disclosure Act (HMDA) data and the 2018 WRLURI showed that more stringent zoning is negatively related to manufactured housing. We used both MH loans with and without land and calculated the percent of MH loan originations relative to the total loan originations in a county. The WRLURI is constructed from a variety of subindexes[1] related to density controls, supply restrictions, and affordability measures among other variables.

We also analyzed the relationship between zoning and MH loan originations by region. Our findings suggest that the relationship is strongest[2] in the Northeast and the West.

Factors besides zoning may affect manufactured housing. For example, regional differences in views and perceptions[3] could play an important role. It is important to control for other relevant factors to formulate accurate predictions. Therefore, we leveraged several machine-learning and statistical-modeling tools to isolate the factors in our dataset that predict how zoning affects manufactured housing.

Results are consistent across several estimation techniques. Go to Appendix A, Exhibits A.6 through A.10 for more details. This additional analysis confirmed that the stringency of regulation around residential land use has a negative effect on manufactured home loan originations. For example, the effect of WRLURI on the share of MH loans is about -0.2. This means that if regulation around land use becomes more stringent[4] by a factor of 1 as measured by WRLURI, the share of MH loans is predicted to decrease by about 0.2%. In other words, if a jurisdiction with a WRLURI of 1 and MH loans representing 4% of total loans, making zoning more stringent to a point where its WRLURI increased to 2, the share of MH loans in that jurisdiction would decrease and become equal to about 3.8%.[5] Using a different modeling approach, Dawkins et al. (2011) found that zoning regulations reduce the odds that one manufactured home or more will be placed in a community.

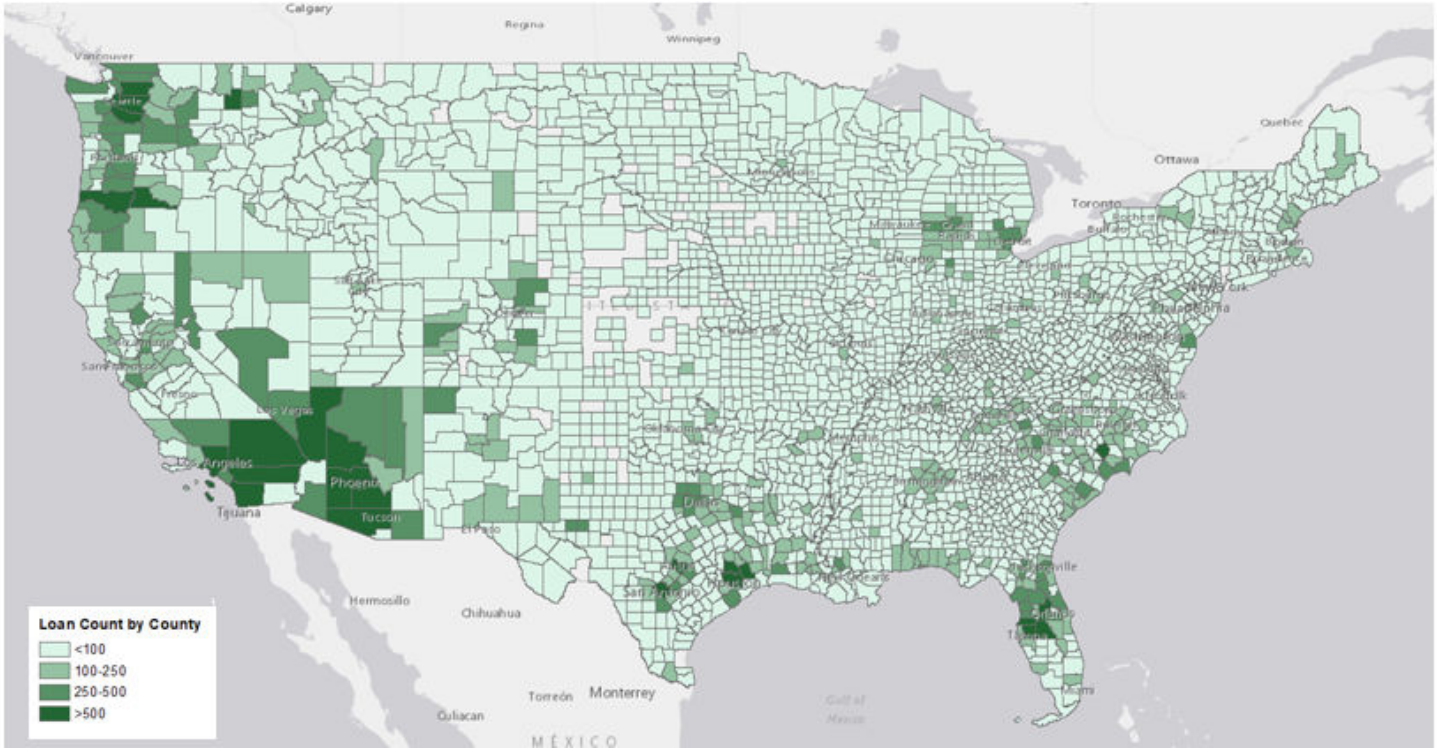
Furthermore, we explored relationships between shipments of manufactured homes and zoning using U.S. Census Bureau 2020 shipment data. As might be expected, the more stringent a state's land-use regulation[6], the smaller the number of manufactured homes shipped to that state.

Finally, Freddie Mac explored loan originations to gain insights on where manufactured homes are being financed. As shown in Exhibit 4, loan originations are most heavily concentrated in the West – in Washington, Oregon, California, Nevada, and Arizona – as well as in Michigan, Colorado, Southeast Texas, and Central Florida. Notable concentrations also are in Middle Appalachia and along the Southeast coasts. Manufactured home loans as a percentage of all loans are highest in the southern part of the country. This pattern is consistent for households with low and moderate incomes and consistent with trends we see in the shipment data.

In addition to zoning laws, perceptions and other economic and social factors (for example, demographics, household incomes and lack of affordable housing options) may also lead to geographic differences in the acceptance and prevalence of manufactured homes.

1 See (Gyourko et al., 2019) for more details about the construction of the 2018 WRLURI.
2 The correlation between WRLURI and MH loans as a percentage of total loans in the Northeast and the West is equal to -03 and -0.27, respectively, compared to -0.16 and -0.02 in the South and Midwest, respectively.
3 Further analysis is needed to fully control for perceptions. However, our methodology captures part of the effect of perceptions through the inclusion of region dummies in the models
4 Zoning can become more stringent for a variety of reasons, among which are lot-size requirements, limits on the supply of new housing, and more.
5 The third column of Exhibit 4 reports the marginal effects from the second part of the ZIM. Technically, the coefficient on the WRLURI means that, conditional on seeing a MH loan in a county, a unit increase in WRLURI will lead manufactured housing as a percentage of total loans to decrease by about 0.2%
6 MH shipment data are at the state level, whereas stringency of regulation is at the jurisdiction level. To mitigate this difference, we calculated the average stringency across all jurisdictions within the same state and assigned the average to the state. Analysis of shipment data focused on the 32 states in the consolidated zoning dataset.

## Exhibit 4: Concentration of Manufactured Home Loans by County




**Note:** Data is 2020 HMDA originations and purchases of manufactured housing properties for home purchase or refinance; non-conforming loans, second liens, unsecured loans, and loans with missing values for applicant income are excluded. Shading represents loan count within each county.

# III. MH-FRIENDLY JURISDICTIONS AND MH MARKET OPPORTUNITIES

Manufactured housing is attracting more and more attention as a potential remedy to issues related to housing affordability and sustainable homeownership. However, as our analysis revealed, states and local governments by means of zoning hinder the use and acceptance of manufactured housing. To address industry requests for information that could help in identifying significant opportunities for market growth and transformation, Freddie Mac developed a framework for defining the level of opportunity a jurisdiction offers for manufactured housing. Based on our analysis of existing literature and indices using the consolidated zoning dataset we created, we constructed the MH Friendly Index based on criteria related to the following:

- Lot-size requirements – looser density requirements imply lesser restrictions on the supply of new housing; lower lot size requirements imply more affordable or cheaper cost of land
- The Wharton Residential Land Use Regulatory Index (WRLURI)
- Restrictions on the placement of manufactured housing through zoning laws
- The number of constraints imposed on new housing supply
- The degree to which the jurisdiction encourages inclusion of manufactured housing through the designation of manufactured homes as real property, zoning, and consistent treatment with other housing types

Our MH Friendly Index has three tiers. Tier 1 includes jurisdictions that are most welcoming to manufactured housing. We define Tier 2 jurisdictions by relaxing some of the criteria we used to define Tier 1 to include jurisdictions that may apply more stringent restrictions; we further relaxed our criteria to define Tier 3. The tiers are not mutually exclusive: All jurisdictions in Tier 1 are included in Tier 2 and all jurisdictions in Tier 2 are included in Tier 3. Exhibit 5 summarizes the criteria for each tier. Go to Appendix B for a list of jurisdictions and their corresponding MH-friendliness tier, county, state, nearest metropolitan area, and region.

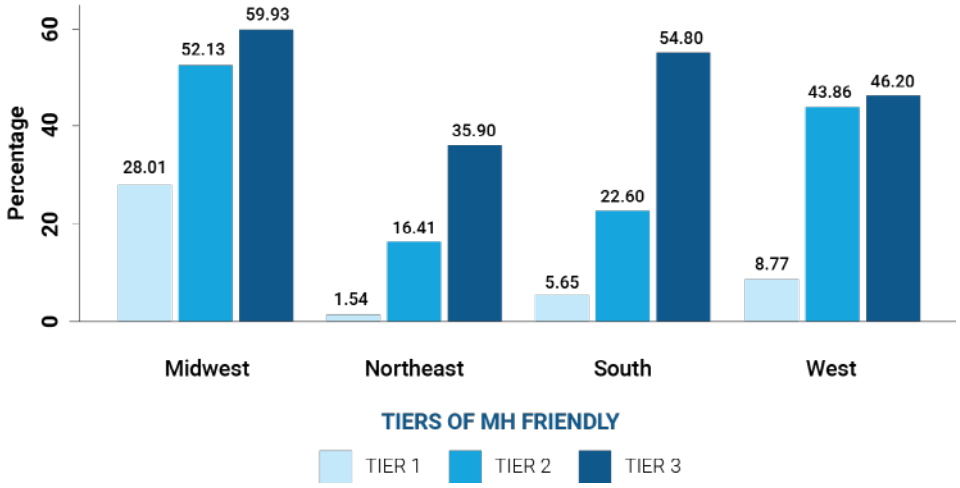
## Exhibit 5: Criteria for Defining the Tiers of the MH Friendly Index

| TIER 1 | TIER 2 | TIER 3 |
|---|---|---|
| Has a lot-size requirement of a half-acre or less. | Has a largest minimum lot-size requirement of 2 acres or less. | Has a largest minimum lot-size requirement of 2 acres or less. |
| Has a WRLURI less than the median, less stringent regulation around residential land use than half of the sample. | Has a WRLURI less than the 75th percentile, less stringent regulation around residential land use than 75% of the sample. | Has a WRLURI less than the 75th percentile, less stringent regulation around residential land use than 75% of the sample. |
| Allows manufactured housing placements to some extent or at least does not ban it outright. | Allows manufactured housing placements to some extent or at least does not ban it outright. | Either allows manufactured housing placements to some extent or at least does not ban it outright; or no state laws cover zoning preemption. |
| Imposes no annual caps on building permits, construction, or number of dwellings and units (i.e., no caps on the supply of new housing). | Imposes no annual caps on building permits, construction, or number of dwellings and units (i.e., no caps on the supply of new housing). | Imposes no annual caps on building permits, construction, or number of dwellings and units (i.e., no caps on the supply of new housing). |
| Strongly encourages inclusion of manufactured housing through the designation of manufactured homes as real property, zoning, and consistent treatment with other housing types. | Moderately or strongly encourages inclusion of manufactured housing through the designation of manufactured homes as real property, zoning, and consistent treatment with other housing types. | Weakly, moderately, or strongly encourages inclusion of manufactured housing through the designation of manufactured homes as real property, zoning, and consistent treatment with other housing types. |

Exhibit 6 shows the proportion of MH-friendly jurisdictions by region. The Midwest has the highest percentage of jurisdictions in each tier. In fact, about 60% of jurisdictions in the Midwest are MH-friendly. Even in the Northeast where we find the lowest number of MH-friendly jurisdictions, 36% of jurisdictions are MH friendly.

## Exhibit 6: Percentage of MH Friendly Jurisdictions by Region

To highlight the opportunity to expand manufactured housing in MH-friendly jurisdictions, we layered in Freddie Mac's unique "mortgage-




**Source:** MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use. Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

readiness" measure. Using anonymized individual credit bureau data as of January 2021, we define consumers as "mortgage ready" if they meet the following criteria:

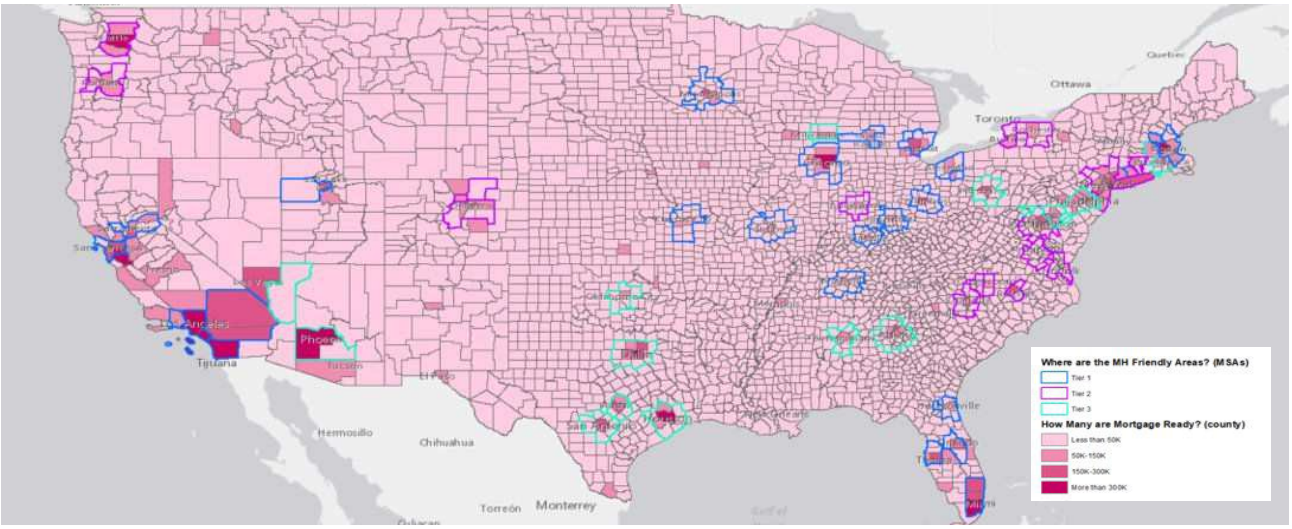
- Do not currently have a mortgage
- Are 45 years old or younger
- Have a credit score of at least 660
- A debt-to-income ratio not exceeding 25%
- Have no foreclosures or bankruptcies in the past 84 months
- Have no severe delinquencies in the past 12 months[7].

Go to Appendix B, Exhibit B.2 for more details. To provide a more targeted perspective, we also estimated the number of low- and moderate-income "mortgage ready" consumers in each the metropolitan area, or those whose incomes are 100% of the area median income (AMI) or less[8]. We estimate that between 7,000 and 2.8 million "mortgage-ready" consumers with low and moderate incomes live in each of the metropolitan areas with MH-friendly jurisdictions. In total, close to 25 million "mortgage-ready" consumers live in MH-friendly metro areas.

7 See Freddie Mac Insight Report "Who Are The Future Borrowers? A Deep Dive into their Barriers and Opportunities" for more details.
8 Consistent with a Duty to Serve Underserved Markets focus, we consider low- to moderate-income consumers as those with incomes up to 100% of the area median income (AMI). See Underserved Areas Data | Federal Housing Finance Agency (fhfa.gov) for AMI definitions.

Exhibit 7 highlights some of the metropolitan areas that present immediate opportunities to expand the manufactured housing market. It shows the intersection of several MH-friendly areas (outlined in blue, purple, and green) and concentrations of mortgage-ready households (in shades of red).

## Exhibit 7: MH Market Opportunities




**Source:** Mortgage-readiness is based on Freddie Mac calculations using anonymized credit bureau data for January 2021. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

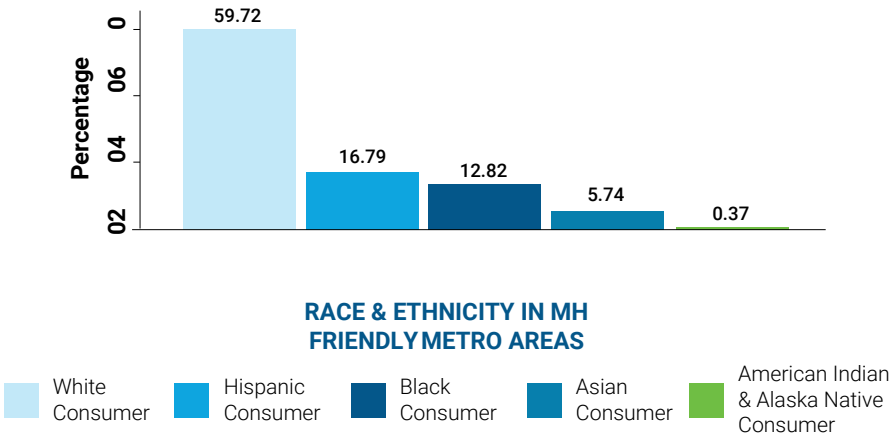
Interestingly, the mean number of manufactured homes shipped in Tier 1 MH-friendly states is nearly 2,000 units annually, 700 units fewer than in states in tiers 2 or 3. This could be due to potential differences in whether the units are shipped to metro versus non-metro areas. However, this remains uncertain because data are captured at the state level only. Regardless, this highlights the opportunity around manufactured housing, particularly in Tier 1 jurisdictions. Moreover, we found MH-friendly jurisdictions in all states in our dataset, some of which are in tiers 2 and 3, further demonstrating that many more consumers could benefit from the availability of manufactured homes.

Additionally, although the Midwest has the highest share of MH-friendly jurisdictions, it has the second lowest mean number of shipments (about 1,550). According to Census Bureau data, the Midwest has also the lowest average sales price of manufactured homes with more than two sections. This further highlights the opportunity in the Midwest – not only in terms of zoning, but also from a pricing standpoint; consumers could benefit from lower prices in that region. Lastly, the West and the Midwest received a similar number of units, with shipments in the West being slightly higher.

Freddie Mac also looked at the characteristics of communities that are accepting of and welcoming to manufactured housing. Exhibit 8 shows demographic traits of these communities. On average, MH-friendly communities contain 17% Hispanic, 13% Black, 6% Asian, about 0.4% American Indian or Alaska Native , and 60% White residents. For comparison, in the 2020 HMDA data for site-built home purchases, Black borrowers represented more than 7% and Hispanic borrowers represented 9% of the market. Moreover, an average person living in an MH-friendly metro area has a yearly income[9] of about $61,000. Manufactured home loans in MH-friendly metros[10] are more prevalent among people between 25 and 34 years old. Consumers aged 55 to 64 are the second largest demographic with manufactured housing loans. In addition, the average homeownership rate in MH-friendly metros is about 65%; the average share of Black and Hispanic mortgage-ready consumers in these communities is approximately 26%. Go to Appendix B, Exhibit B.3 for detailed profiles of communities that are welcoming to manufactured housing.

9 Income refers to income per capita.
10 2020 HMDA data are missing age data on loans for some age groups in five MH-friendly communities.

## Exhibit 8: Race and Ethnicity in MH-Friendly Metropolitan Areas




**Notes:** The percentages represent the mean across all MH friendly metropolitan areas (see Appendix) for a breakdown of race by metro area).

Asians include Native Hawaiians and Pacific Islanders. Whites, Blacks, Asians, America Indians and Native Alaskans are non-Hispanic members of these racial groups.

**Source:** Freddie Mac's calculations using 2019 and 2020 demographic data from Census Bureau and Brookings Institute.

It is important to note that additional market opportunities could arise for manufactured housing if zoning were less stringent. In fact, we identified areas of potential opportunity and calculated how many mortgage-ready consumers reside in these metropolitan areas, as shown in Exhibit 9. We estimate that an additional 1.08 million individuals could benefit if zoning were less stringent in these metro areas.

## Exhibit 9: Market Opportunity in Metro Areas with Less Stringent Zoning

| METROPOLITAN AREA | REGION | NUMBER OF "MORTGAGE-READY" CONSUMERS | NUMBER OF LOW TO MODERATE INCOME (LMI)[11] "MORTGAGE-READY" CONSUMERS |
|---|---|---|---|
| San Jose-Sunnyvale-Santa Clara, CA | West | 446,000 | 408,000 |
| Santa Rosa, CA | West | 73,000 | 64,000 |
| Vallejo-Fairfield, CA | West | 56,000 | 50,000 |
| Bridgeport-Stamford-Norwalk, CT | Northeast | 146,000 | 127,000 |
| Ann Arbor, MI | Midwest | 60,000 | 52,000 |
| Muskegon, MI | Midwest | 13,000 | 9,000 |
| Ocean City, NJ | Northeast | 10,000 | 8,000 |
| Trenton, NJ | Northeast | 53,000 | 47,000 |

11 The number of LMI mortgage-ready consumers is a subset of the total number of mortgage-ready consumers in each metro area listed in Exhibit 9.

| METROPOLITAN AREA | REGION | NUMBER OF "MORTGAGE-READY" CONSUMERS | NUMBER OF LOW TO MODERATE INCOME (LMI)[12] "MORTGAGE-READY" CONSUMERS |
|---|---|---|---|
| Shawnee, OK | South | 5,000 | 3,000 |
| Memphis, TN-MS-AR | South | 112,000 | 74,000 |
| Ogden-Clearfield, UT | West | 80,000 | 66,000 |
| Olympia-Tumwater, WA | West | 35,000 | 29,000 |

**Note:** Mortgage-ready numbers are rounded up to the nearest thousand. LMI refers to low- to moderate-income consumers, with incomes up to 100% of the area median income.

**Source:** Mortgage-readiness is based on Freddie Mac calculations using anonymized credit bureau data for January 2021.

# IV. CONCLUSIONS

Manufactured housing has been gaining visibility as increasingly important to meeting the nation's need for safe, affordable housing. However, it historically has accounted for only around 10% of the housing supply. Freddie Mac's analysis in response to industry requests for insight into factors that may be holding back the market and opportunities to move it forward revealed that, while more stringent zoning regulations constrained manufactured housing ownership, many jurisdictions present opportunities.

Through our analysis, we identified areas with immediate opportunities for manufactured housing to help alleviate the housing shortage. For example, the Midwest contains the greatest share of jurisdictions that we identified as MH friendly, but that region receives the second lowest number of MH shipments. More individuals and developers might benefit from considering manufactured homes as an attractive, affordable housing solution in these jurisdictions. Areas that currently are not MH friendly and housing-constrained may benefit from reexamining the factors that influence housing in those areas and considering the examples set by jurisdictions that are friendlier to manufactured housing.

Also based on our findings, nearly 25 million people living in MH-friendly jurisdictions are "mortgage ready" today. An additional 1.08 million individuals could benefit from manufactured housing if zoning was less stringent in some jurisdictions in our data. In addition, MH-friendly jurisdictions contain a larger share of Black and Hispanic potential homebuyers, when compared to recent buyers of site-built homes.

Besides zoning however, perceptions significantly affect decisions around manufactured housing. Many consumers imagine manufactured homes as unattractive, unsafe, a bad investment and lenders are concerned about loan performance. In reality, manufactured homes are built to strict standards of quality established nationally by the U.S. Department of Housing and Urban Development, attractive, resilient, energy-efficient, and appreciate in value at about the same rate as site-built homes (Goodman et al., 2018). Although we attempted to control for perceptions in our analysis, more research is needed to understand the influence of perceptions on zoning and homebuying decisions. More work also needs to be done to help dispel long-held misperceptions.

Perceptions among younger people already may be changing, based on our findings that Millennials hold the highest percentage of manufactured home loans. Given that Millennials are the largest generation and just entering prime homebuying years, the pace of the manufactured housing market's growth may increase naturally to an extent. This cohort also could serve as advocates, promoting the benefits of manufactured homes to others and thereby increasing market opportunity.

The opportunity for manufactured housing to play a larger role in increasing affordable housing supply is great; so are the challenges. Working collaboratively across the housing ecosystem will be essential to lowering barriers and making the most of the opportunity.

12 The number of LMI mortgage-ready consumers is a subset of the total number of mortgage-ready consumers in each metro area listed in Exhibit 9.

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# Appendix A: Data and Methodology

## I. Data

Information from the 2020 Home Mortgage Disclosure Act (HMDA), National Longitudinal Land Use Survey (NLLUS) 2019, the Manufactured Housing Institute (MHI), the Wharton Residential Land Use Index survey (WRLURI 2018), and data compiled by Virginia Tech for the U.S. Department of Housing and Urban Development were combined to produce a consolidated dataset that summarizes MH, zoning, and land use information from these four sources. A total of 825 jurisdictions across 32 states were matched using on Federal Information Processing System (FIPS) codes, which provide a standardized system for identifying various levels of geography (states, counties, core-based statistical areas (CBSAs), places, and more).

The observational unit in the consolidated dataset is the jurisdiction whereas data from MHI are at the state level. Jurisdictions within the same state were assigned the same indicators as those of their respective states. One variable was affected by the above: treatment of MH in zoning laws. As it pertains to the latter variable, our approach is validated by the mere legal fact that the state has zoning authority. The same strategy was also used for the State Regulatory Inclusionary Index retrieved from data compiled by Virginia Tech for the U.S. Department of Housing and Urban Development. Manufactured home loans as a percentage of total loans were retrieved from the 2020 HMDA and is available at the county level. We employed a similar approach by assigning the same value to jurisdictions within the same county. Relating to the remaining variables from the other sources, observations were available at the jurisdiction level.

### Summary Statistics

Density restrictions are often used to constrain supply of new housing (Gyourko et al., 2019). Exhibit 2 shown in the main text summarizes the Density Restrictions Index (DRI). We, however, provide additional details and offer more insights and statistics linking DRI to other relevant information relating to manufactured home loans.

The DRI was constructed as a subindex of the WRLURI by asking respondents in the 2018 WRLURI whether minimum lot-size requirements are in place and, if so, what the largest minimum lot size is for any neighborhood within the same jurisdiction. This subindex was divided into five categories and takes on the following values:

DRI = 0 if there is no minimum lot size regulation anywhere in the jurisdiction

= 1 if there is a minimum, but it is no larger than 0.5 acres

=2 if there is a minimum, and the largest one is from 0.5-1.0 acres

=3 if there is a minimum, and the largest one is from 1.0-2.0 acres

=4 if there is a minimum, and the largest one is for more than 2 acres.

There is 2% difference between the share of jurisdictions that require a largest minimum lot size between 0.5 and 1 acres and those in which the largest minimum lot size is between 1 to 2 acres (15.99% vs 13.98% respectively). Exhibit A.1 shows how the DRI varies with the treatment of MH in state-level zoning laws. In the first row, 173 jurisdictions are in states where cities are required to prohibit outright bans of manufactured homes and must allow them in some area(s) within the city. Within those jurisdictions, a DRI of 1 (lot size requirement of up to 0.5 acres) is most common (36%). In contrast, 175 jurisdictions do not have state laws on zoning preemption regarding MH placement (Level 3). Of these, 30% have a minimum lot-size requirement of up to 0.5 acres.

## Exhibit A.1: Treatment of MH in Zoning Laws and Density Restriction Index

| DRI | | | | | | |
|---|---|---|---|---|---|---|
| Zoning Laws | 0 | 1 | 2 | 3 | 4 | **Total** |
| Level 1 | 6 | 63 | 34 | 30 | 40 | **173** |
| | 3.47 % | 36.42% | 19.65% | 17.34% | 23.12% | **100%** |
| Level 2 | 20 | 190 | 56 | 52 | 128 | **446** |
| | 4.48% | 42.60% | 12.56% | 11.66% | 28.70% | **100 %** |
| Level 3 | 14 | 52 | 37 | 29 | 43 | **175** |
| | 8% | 29.71% | 21.14 % | 16.57 % | 24.57 % | **100 %** |
| **TOTAL** | **40** | **305** | **127** | **111** | **211** | **794** |
| | **5.04%** | **38.41%** | **15.99%** | **13.98%** | **26.57%** | **100 %** |

**Source:** Freddie Mac's calculations using the 2018 WRLURI.

DRI: Density Restrictions Index
DRI= 0 if there is no minimum lot size regulation anywhere in the jurisdiction
= 1 if there is a minimum, but it is no larger than 0.5 acres
=2 if there is a minimum, and the largest one is from 0.5-1.0 acres
=3 if there is a minimum, and the largest one is from 1.0-2.0 acres
=4 if there is a minimum, and the largest one is for more than 2 acres

Next, Exhibit A.2 shows some statistics about manufactured housing and Wharton Residential Land Use Regulatory Index, 2018 (WRLURI). WRLURI measures how stringent regulation around residential land use is. Higher values of this index indicate stricter regulation around residential land use. Note that the mean of WRLURI varies slightly by levels of treatment of MH in zoning laws (between 0.1 and 0.35 across all three levels).

## Exhibit A.2: Zoning Laws and the Mean WRLURI

| WRLURI | | |
|---|---|---|
| **Zoning Laws** | **Frequency** | **Mean** |
| Level 1 | 166 | 0.10 |
| Level 2 | 426 | 0.35 |
| Level 3 | 168 | 0.19 |

**Source:** Freddie Mac's calculations using the 2018 WRLURI survey and 2021 data from the Manufactured Housing Institute.

**Level 1**: Jurisdiction is required to prohibit outright bans and must allow for MH in some areas within the city.

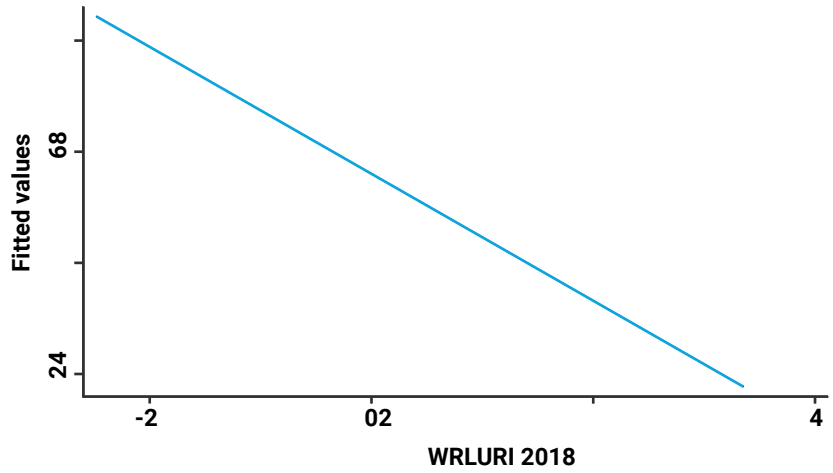
**Level 2**: Jurisdiction is prohibited from outright banning MH but is allowed to impose the same building standards to both manufactured and site-built homes.

**Level 3**: No state laws on zoning preemption for MH owners.

### II. Methodology

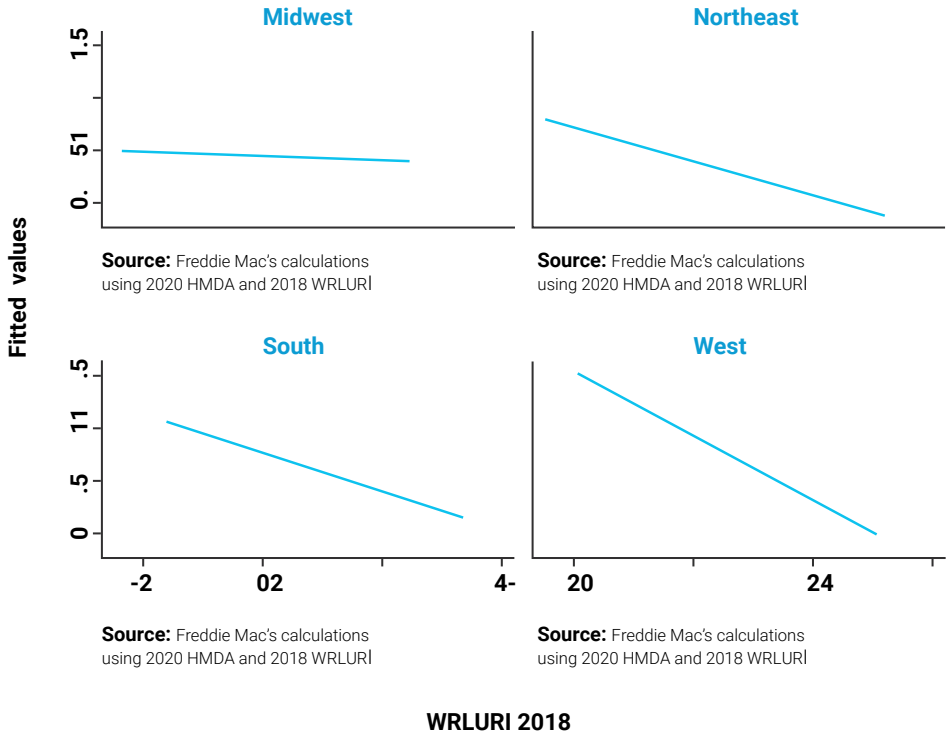
Freddie Mac began by assessing the relationship between zoning and MH loans as a percentage of total loans using a Pearson correlation analysis. Exhibit A.3 plots the linear prediction of MH loans and WRLURI in the overall sample while Exhibit A.4 breaks down the relationship by region. Exhibit A.4 suggests that the relationship between MH loans as a percent of total loans and WRLURI is strongest in the Northeast and the West as the slope is steeper in these regions. These relationships are statistically significant at the 1% level (see Exhibit A.5).

## Exhibit A.3: Linear Prediction of MH as a Percentage of Total Loans by WRLURI




**Source:** Freddie Mac's calculations using 2018 WRLURI and 2020 HMDA.

## Exhibit A.4: Linear Prediction of MH as a Percentage of Total Loans by WRLURI and by Region




**Source:** Freddie Mac's calculations using 2020 HMDA and 2018 WRLURI

**Source:** Freddie Mac's calculations using 2020 HMDA and 2018 WRLURI

**Source:** Freddie Mac's calculations using 2020 HMDA and 2018 WRLURI

**Source:** Freddie Mac's calculations using 2020 HMDA and 2018 WRLURI

## Exhibit A.5: Correlation Coefficients between WRLURI and MH as a Percentage of Total Loans by Region

| SOUTH | NORTHEAST | WEST | MIDWEST |
|---|---|---|---|
| -0.16** | -0.3*** | -0.27*** | -0.02 |

**Significant at the 5% level
***Significant at the 1% level

Aside from zoning, many factors could influence MH loans as a percentage of total loans. Therefore, correlation analysis alone does not reveal the full picture and could lead to biased results. To better estimate the relationship between zoning and manufactured housing, we leveraged modern machine-learning and statistical tools.

The first step in modeling the relationship between our two variables of interest was to choose relevant covariates that are associated with MH loans as a percentage of total loans. We used machine learning in the variable-selection stage to help us decide which variables to include in the statistical models. The machine-learning model we used is the Least Absolute Shrinkage and Selection Operator (LASSO) with the "post-double-selection" methodology by Belloni et al. (2012, 2013, 2014, 2015 and 2016). This method employs a LASSO twice and has been demonstrated to allow for imperfect selection of controls while providing confidence intervals that are valid uniformly across a large class of models (Belloni et al, 2014, 2016). As a robustness check, we also implemented an elastic net (Zou and Hastie, 2005) and ridge regression (Tikhonov, 1963; Hoerl and Kennard, 1970) and similar variables were selected in all approaches. Given the variables selected by the machine-learning model, we used econometric models to predict the impact of zoning on MH loans as a percent of total loans.

The ordinary Least Squares estimator was considered first. This method is most efficient under exogeneity and when distributional assumptions are not violated. However, MH as a percent of total loans is right skewed (skewness is equal to 3.92) and contains a few zeros. This suggests that the OLS estimator could produce biased and inconsistent results.

In fact, upon further inspection, the distribution of MH as a percentage of total loans is more like a Poisson distribution. Applied researchers sometimes use log normal distribution to handle right-skewed data that exhibit similar traits to ours. However, it is preferable to use Poisson here because it is more robust if the Huber White variance covariance estimator is used (Cameron and Trivedi, 2010; Wooldridge, 2010; Silva and Torenyo 2006). Further, Poisson can handle the zeros whereas the log of zero is infinity. Moreover, the expected value of the log of MH is different from the expected value of MH, further highlighting why Poisson is superior to log normal in this instance. It is important to note that Poisson assumes full participation, meaning that the zeros are natural zeros. In our case, this means that all jurisdictions in the sample participated. Intuitively, one can think of the concept of participation in the following example. In an earned income model where, one is interested in using a set of influencer variables to predict income, a zero in that context means that the individual did not participate in the labor market. Therefore, a statistician would say that, in our earnings example, a zero is not a natural zero and implies there is not full participation as the individuals who earned no income were not part of the labor force.

However, in our case, when MH as a percentage of total loans is equal to zero, it does not necessarily mean that the jurisdiction with the zero did not participate in the mortgage market. A zero simply means that there were no manufactured home loans out of all loans in that jurisdiction. Therefore, it is possible to argue that participation is not an issue and a Poisson with standard errors estimated using the Huber White variance covariance estimator is more suitable.

One may have a different perspective on participation. Given that placement of MH is constrained by zoning laws, it is possible to argue that a jurisdiction with zero percent of MH loans means that the jurisdiction could not participate as zoning in that jurisdiction does not allow placement of MH. Our variable relating to zoning regulations does not allow us to confirm this as no zoning preemption does not necessarily imply prohibition from placing MH in a jurisdiction. One could therefore argue that the share of MH loans in our data is generated by two processes: one that explains what drives whether we see a MH loan and another that predicts the share of MH loans as a percent of total loans. If the likelihood is indeed separable, a zero inflated model is more appropriate.

A zero inflated model is a class of statistical models for data that contains an excess of zeros where the zeros result from a separate data-generation process. The first part of the zero-inflated model uses a binary choice model to predict the probability of a jurisdiction having no MH loans or at least one MH loan. We estimated the model using logistic regression (logit) by penalized maximum likelihood as we ran into a quasi-complete separation issue where some covariates predicted success perfectly.

The second part of the zero inflated model predicts the strictly positive portion of the distribution or the share of MH loans in a jurisdiction. Given that distribution is right skewed, we estimated the model using a Generalized Linear Model (GLM) with Gamma distribution and a log link function.

Exhibits A.6, A.7 and A.8 show the full estimation results while Exhibit A.9 summarizes results for variables that are statistically significant. Recall that zoning laws or the stringency of regulation around residential land use is measured using the WRLURI. Results are consistent across all methods. We found that the more stringent regulation around residential land use is, the lower the percentage of manufactured home loans as a percentage of total loans. The marginal effects on the WRLURI variable that capture the magnitude of the effect of land-use regulation on MH loans as a percentage total loans are reported in the exhibits named above. Our results suggest that a unit increase in WRLURI leads to a decrease in the share of MH loans of about -0.2.

The models also predict that other relevant variables are associated with MH loans as a percentage of total loans. For example, we found that, compared to the South and the Northeast regions, jurisdictions in the West have a higher share of MH loans. In fact, being in the West increases MH as a percentage of total loans by 0.2% to 0.3%. The results also suggest that counties where builders are required to have an affordable housing program to build there tend to have a lower share of MH loans compared to those who don't impose that requirement.

Finally, Exhibit A.10 shows marginal effects from estimation of the logit by penalized maximum likelihood. Results suggest that jurisdictions in the West and Midwest have a higher likelihood of having at least one MH loan relative to those in the South or Northeast. Jurisdictions where builders are required to have an affordable housing program are associated with a higher likelihood of at least one MH loan. Finally, jurisdictions located in states with no state laws on zoning preemption and those that must allow MH in some area within the city have a higher likelihood of at least one MH loan compared to places that must allow MH but can still impose some building standards to MH.

# Exhibit A.6: Estimates from the OLS Estimator

| percentmh2 | Coef. | Std. Err. | t | P>\|t\| | [95% Conf. | Interval] |
|---|---|---|---|---|---|---|
| WRLURI18 | -.1768107 | .0715267 | -2.47 | 0.014 | -.317232 | -.0363895 |
| DRI18 | | | | | | |
| mlls <0.5 | .0353539 | .1236938 | 0.29 | 0.775 | -.2074819 | .2781897 |
| mlls:0.5-1 | .128439 | .1433344 | 0.90 | 0.371 | -.1529552 | .4098332 |
| mlls:1-2 | .0105818 | .1310123 | 0.08 | 0.936 | -.2466218 | .2677853 |
| mlls>2 | .0482083 | .1261665 | 0.38 | 0.702 | -.1994818 | .2958985 |
| 1.OSI18 | .0650499 | .0670149 | 0.97 | 0.332 | -.0665139 | .1966137 |
| lzai | | | | | | |
| 1 | -.2252898 | .1030834 | -2.19 | 0.029 | -.4276633 | -.0229164 |
| 2 | -.0478889 | .0821766 | -0.58 | 0.560 | -.209218 | .1134403 |
| 4 | .1023002 | .0953423 | 1.07 | 0.284 | -.084876 | .2894764 |
| 5 | -.0040524 | .1053984 | -0.04 | 0.969 | -.2109707 | .2028659 |
| lpai | | | | | | |
| 1 | -.1060776 | .0722517 | -1.47 | 0.142 | -.2479223 | .035767 |
| 4 | -.063731 | .0929899 | -0.69 | 0.493 | -.2462889 | .1188269 |
| 5 | .0695873 | .115646 | 0.60 | 0.548 | -.1574491 | .2966236 |
| 1.LAI18 | .0001073 | .0715671 | 0.00 | 0.999 | -.1403934 | .140608 |
| spii | | | | | | |
| 3 | -.0259173 | .0819231 | -0.32 | 0.752 | -.1867488 | .1349141 |
| 4 | .0929276 | .0941894 | 0.99 | 0.324 | -.0919852 | .2778404 |
| 5 | -.1348378 | .1111058 | -1.21 | 0.225 | -.3529608 | .0832853 |
| cii | | | | | | |
| 4 | -.0771429 | .0658886 | -1.17 | 0.242 | -.2064954 | .0522096 |
| 5 | -.0441746 | .0879808 | -0.50 | 0.616 | -.2168987 | .1285495 |
| 6 | .2049818 | .1282011 | 1.60 | 0.110 | -.0467028 | .4566664 |
| 1.AHI18 | -.1712485 | .0735686 | -2.33 | 0.020 | -.3156786 | -.0268185 |
| region | | | | | | |
| 1 | .2935076 | .127198 | 2.31 | 0.021 | .0437924 | .5432229 |
| 2 | -.1406893 | .0682755 | -2.06 | 0.040 | -.2747277 | -.0066508 |
| MH_Protection | | | | | | |
| Level 3 | .1040106 | .1044602 | 1.00 | 0.320 | -.1010658 | .309087 |
| Level 1 | -.2360239 | .0581025 | -4.06 | 0.000 | -.3500907 | -.1219571 |
| _cons | .5931002 | .1556097 | 3.81 | 0.000 | .2876071 | .8985933 |

**Note:** WRLURI: Wharton Residential Land Use Regulatory Index.

DRI: Density Restrictions Index and mlls indicates lot size requirements where mlls<0.5 means the jurisdiction requires a minimum lot size of up to 0.5 acres

OSI: Open Space Index, indicates that some type of mandatory space provision is required.

LZAI: Local Zoning Approval Index, pertains to projects that require some type of variance or change to the local zoning code and takes on values 0-18 (see Gyourko et al., 2019).

LPAI: Local Project Approval Index, pertains to projects that do require some type of variance to the current zoning code and could take on values 0-18 (see Gyourko et al., 2019).

LAI: Local Assembly Index, measures whether the local regulatory environment requires some type of direct democracy involvement of the local population and takes on values 0-2 (see Gyourko et al., 2019).

SPII: State Political Involvement Index, measures how involved is the state legislature in influencing residential building activities and or growth management procedures and ranges from 0 (no involvement) to 5 (very involved)

CII: Court Involvement Index, ranges from 2 to 10 (see Gyourko et al., 2019).

AHI: Affordable Housing Index, means that the county requires a county to have an affordable housing program to build in that jurisdiction.

Region: indicates in which region the jurisdiction is located where a "1" means West and "2" means Midwest.

Dj_MH_Protection: measures treatment of MH in state zoning laws where "Level 1" means jurisdiction prohibits outright bans of MH and must allow for MH in some area within the city and "Level 3" means no state laws on zoning preemption.

Subsumed in the intercept are jurisdictions in the South or Northeast, those that must allow MH but could impose building standards but could impose building standards. Also subsumed in the intercept are jurisdictions where builders are not required to have an AHI, those with an LZAI of 0, 3, 6, 7, 8 or 9; jurisdictions with a largest minimum lot size less than 2 acres; jurisdictions with a LPAI equal to 0, 3, 6, 7, 8, 9, 11 or 12; jurisdictions with an SPII of 1 or 2; jurisdictions with a CII of 2, 3, 7, 8, 9 or 10.

# Exhibit A.7: Marginal Effects from Estimation of the Poisson

| | Delta-method dy/dx | Std. Err. | z | P>\|z\| | [95% Conf. | Interval] |
|---|---|---|---|---|---|---|
| WRLURI18 | -.1772624 | .0690118 | -2.57 | 0.010 | -.312523 | -.0420019 |
| DRI18 | | | | | | |
| mlls <0.5 | .0249892 | .1025335 | 0.24 | 0.807 | -.1759728 | .2259513 |
| mlls:0.5-1 | .12643 | .1260175 | 1.00 | 0.316 | -.1205598 | .3734197 |
| mlls:1-2 | -.0026455 | .1155323 | -0.02 | 0.982 | -.2290847 | .2237936 |
| mlls>2 | .0522915 | .1103542 | 0.47 | 0.636 | -.1639988 | .2685818 |
| 1.OSI18 | .0702035 | .0612167 | 1.15 | 0.251 | -.0497791 | .190186 |
| lzai | | | | | | |
| 1 | -.1852192 | .0849826 | -2.18 | 0.029 | -.351782 | -.0186565 |
| 2 | -.0409855 | .073903 | -0.55 | 0.579 | -.1858328 | .1038617 |
| 4 | .1162748 | .1097946 | 1.06 | 0.290 | -.0989187 | .3314683 |
| 5 | -.0038069 | .1212585 | -0.03 | 0.975 | -.2414692 | .2338554 |
| lpai | | | | | | |
| 1 | -.0976242 | .0633385 | -1.54 | 0.123 | -.2217655 | .026517 |
| 4 | -.0693062 | .0965243 | -0.72 | 0.473 | -.2584902 | .1198779 |
| 5 | .0621486 | .1459144 | 0.43 | 0.670 | -.2238384 | .3481356 |
| 1.LAI18 | -.0045663 | .0665838 | -0.07 | 0.945 | -.1350682 | .1259356 |
| spii | | | | | | |
| 3 | -.027512 | .0845996 | -0.33 | 0.745 | -.1933241 | .1383001 |
| 4 | .1111334 | .1135056 | 0.98 | 0.328 | -.1113335 | .3336002 |
| 5 | -.140006 | .1009468 | -1.39 | 0.165 | -.337858 | .057846 |
| cii | | | | | | |
| 4 | -.0762968 | .0660577 | -1.16 | 0.248 | -.2057674 | .0531739 |
| 5 | -.0623259 | .0969359 | -0.64 | 0.520 | -.2523167 | .1276649 |
| 6 | .2497506 | .1733113 | 1.44 | 0.150 | -.0899332 | .5894345 |
| 1.AHI18 | -.1940589 | .0708376 | -2.74 | 0.006 | -.332898 | -.0552198 |
| region | | | | | | |
| 1 | .3244913 | .1430235 | 2.27 | 0.023 | .0441704 | .6048122 |
| 2 | -.1262026 | .0611648 | -2.06 | 0.039 | -.2460835 | -.0063218 |
| Dj_MH_Protection | | | | | | |
| Level 3 | .0944784 | .1001589 | 0.94 | 0.346 | -.1018294 | .2907862 |
| Level 1 | -.2426815 | .0540832 | -4.49 | 0.000 | -.3486825 | -.1366804 |

**Note:** See bottom of Exhibit B.6 for dictionary of variables.

# Exhibit A.8: Marginal Effects from Estimation of the Second Part of the Zero Inflated Model

| | Delta-method dy/dx | Std. Err. | z | P>\|z\| | [95% Conf. | Interval] |
|---|---|---|---|---|---|---|
| WRLURI18 | -.1774245 | .053309 | -3.33 | 0.001 | -.2819082 | -.0729409 |
| DRI18 | | | | | | |
| mlls <0.5 | -.0397202 | .1042866 | -0.38 | 0.703 | -.2441181 | .1646778 |
| mlls:0.5-1 | .0667021 | .1257632 | 0.53 | 0.596 | -.1797893 | .3131934 |
| mlls:1-2 | -.0746668 | .1143936 | -0.65 | 0.514 | -.2988742 | .1495406 |
| mlls>2 | -.0180246 | .1082543 | -0.17 | 0.868 | -.2301992 | .1941499 |
| 1.OSI18 | .095971 | .0608512 | 1.58 | 0.115 | -.0232952 | .2152373 |
| lzai | | | | | | |
| 1 | -.1480295 | .0838265 | -1.77 | 0.077 | -.3123265 | .0162675 |
| 2 | -.0130686 | .0640124 | -0.20 | 0.838 | -.1385306 | .1123933 |
| 4 | .0982112 | .1062921 | 0.92 | 0.355 | -.1101174 | .3065398 |
| 5 | .020533 | .1239393 | 0.17 | 0.868 | -.2223836 | .2634496 |
| lpai | | | | | | |
| 1 | -.0656816 | .0616875 | -1.06 | 0.287 | -.1865869 | .0552236 |
| 4 | -.0524571 | .1003948 | -0.52 | 0.601 | -.2492273 | .1443131 |
| 5 | .1352532 | .1861448 | 0.73 | 0.467 | -.2295839 | .5000903 |
| 1.LAI18 | -.004767 | .058114 | -0.08 | 0.935 | -.1186683 | .1091344 |
| spii | | | | | | |
| 3 | .0227188 | .0777728 | 0.29 | 0.770 | -.1297132 | .1751507 |
| 4 | .1630397 | .1096711 | 1.49 | 0.137 | -.0519118 | .3779911 |
| 5 | -.1000514 | .0915719 | -1.09 | 0.275 | -.2795291 | .0794263 |
| cii | | | | | | |
| 4 | -.0784245 | .062642 | -1.25 | 0.211 | -.2012004 | .0443515 |
| 5 | -.0324311 | .1038241 | -0.31 | 0.755 | -.2359226 | .1710604 |
| 6 | .2162324 | .1595691 | 1.36 | 0.175 | -.0965172 | .528982 |
| 1.AHI18 | -.1439108 | .070301 | -2.05 | 0.041 | -.2816982 | -.0061234 |
| region | | | | | | |
| 1 | .1893632 | .1020475 | 1.86 | 0.064 | -.0106462 | .3893726 |
| 2 | -.1545626 | .0734215 | -2.11 | 0.035 | -.298466 | -.0106591 |
| Dj_MH_Protection | | | | | | |
| Level 3 | -.007656 | .0948155 | -0.08 | 0.936 | -.193491 | .1781789 |
| Level 1 | -.3039355 | .0589176 | -5.16 | 0.000 | -.4194119 | -.1884592 |

**Note:** See bottom of Exhibit B.6 for dictionary of variables.

# Exhibit A.9: Effect of Regulation around Residential Land Use on MH Loans as a Percentage of Total Loans

| | (OLS) | (POISSON) | (ZIM) |
|---|---|---|---|
| | Percent MH | Percent MH | Percent MH |
| WRLURI18 | -.177** | -.177*** | -.177*** |
| | (0.072) | (0.069) | (0.053) |
| LZAI=1 | -.225** | -.185** | -.148* |
| | (0.103) | (0.085) | (0.083) |
| AHI | -.171** | -.194*** | -.143* |
| | (0.074) | (0.070) | (0.070) |
| West | .294** | .32** | .189* |
| | (0.127) | (0.143) | (0.102) |
| Midwest | -.141** | -.126** | -.154** |
| | (0.068) | (0.061) | (0.073) |
| Level 1 Zoning | -.236*** | -.242*** | -.303*** |
| | (0.058) | (0.054) | (0.059) |
| Observations | 760.000 | 760.000 | 742.000 |
| (Pseudo) $R^2$ | 0.088 | 0.062 | |

Relevant predictors are reported.
ZIM: Second Part of the Zero Inflated Model.
Standard errors in parentheses.
*Significant at the 10% level
**Significant at the 5% level
***Significant at the 1% level

# Exhibit A.10: Marginal Effects from Estimation of the First Part of the Zero Inflated Model

| | dy/dx | Delta-method Std. Err. | z | P>\|z\| | [95% Conf. | Interval] |
|---|---|---|---|---|---|---|
| WRLURI18 | -.2307862 | .4028125 | -0.57 | 0.567 | -1.020284 | .5587117 |
| DRI18 | | | | | | |
| mlls <0.5 | .1863587 | 1.632428 | 0.11 | 0.909 | -3.013142 | 3.38586 |
| mlls:0.5-1 | .1803554 | 1.64295 | 0.11 | 0.913 | -3.039768 | 3.400479 |
| mlls:1-2 | 1.416773 | 1.835497 | 0.77 | 0.440 | -2.180735 | 5.01428 |
| mlls>2 | 1.285721 | 1.697779 | 0.76 | 0.449 | -2.041864 | 4.613306 |
| 1.OSI18 | -.1430399 | .6316315 | -0.23 | 0.821 | -1.381015 | 1.094935 |
| lzai | | | | | | |
| 1 | 2.382671 | 1.564071 | 1.52 | 0.128 | -.6828523 | 5.448194 |
| 2 | 1.059561 | .6907355 | 1.53 | 0.125 | -.2942553 | 2.413378 |
| 4 | .7939024 | .7551735 | 1.05 | 0.293 | -.6862105 | 2.274015 |
| 5 | -.1498566 | .9948469 | -0.15 | 0.880 | -2.099721 | 1.800008 |
| lpai | | | | | | |
| 1 | -.9593843 | .6252455 | -1.53 | 0.125 | -2.184843 | .2660744 |
| 4 | 1.379033 | 1.00602 | 1.37 | 0.170 | -.592729 | 3.350796 |
| 5 | 2.989576 | 1.885831 | 1.59 | 0.113 | -.7065843 | 6.685736 |
| 1.LAI18 | .2154171 | .5488036 | 0.39 | 0.695 | -.8602182 | 1.291052 |
| spii | | | | | | |
| 3 | -.0973906 | .6514382 | -0.15 | 0.881 | -1.374186 | 1.179405 |
| 4 | .1695992 | 1.031616 | 0.16 | 0.869 | -1.852331 | 2.19153 |
| 5 | 1.025053 | 1.681524 | 0.61 | 0.542 | -2.270674 | 4.32078 |
| cii | | | | | | |
| 4 | -.1017627 | .5694582 | -0.18 | 0.858 | -1.21788 | 1.014355 |
| 5 | -1.422841 | 1.039321 | -1.37 | 0.171 | -3.459873 | .6141912 |
| 6 | .4895217 | 1.285949 | 0.38 | 0.703 | -2.030892 | 3.009936 |
| 1.AHI18 | -1.46022 | .6918453 | -2.11 | 0.035 | -2.816212 | -.1042286 |
| region | | | | | | |
| 1 | 4.072552 | 1.43739 | 2.83 | 0.005 | 1.25532 | 6.889785 |
| 2 | 3.698105 | 1.49614 | 2.47 | 0.013 | .7657245 | 6.630486 |
| Dj_MH_Protection | | | | | | |
| Level 3 | 2.178963 | .9110614 | 2.39 | 0.017 | .3933154 | 3.96461 |
| Level 1 | 1.971167 | .8859884 | 2.22 | 0.026 | .2346613 | 3.707672 |

**Note:** See bottom of Exhibit B.6 for dictionary of variables.

# Appendix B: Additional Exhibits

## Exhibit B.1: List of MH-Friendly Jurisdictions

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[13] |
|---|---|---|---|---|---|---|
| Nashua | Hillsborough County | Boston | city | NH | Northeast | 1 |
| Derry | Rockingham County | Boston | town | NH | Northeast | 1 |
| Bensenville | DuPage County | Chicago | village | IL | Midwest | 1 |
| Westchester | Cook County | Chicago | village | IL | Midwest | 1 |
| Niles | Cook County | Chicago | village | IL | Midwest | 1 |
| Countryside | Cook County | Chicago | city | IL | Midwest | 1 |
| Oak Forest | Cook County | Chicago | city | IL | Midwest | 1 |
| Justice | Cook County | Chicago | village | IL | Midwest | 1 |
| Schiller Park | Cook County | Chicago | village | IL | Midwest | 1 |
| Homewood | Cook County | Chicago | village | IL | Midwest | 1 |
| Western Springs | Cook County | Chicago | village | IL | Midwest | 1 |
| Evanston | Cook County | Chicago | city | IL | Midwest | 1 |
| Mount Prospect | Cook County | Chicago | village | IL | Midwest | 1 |
| Palatine | Cook County | Chicago | village | IL | Midwest | 1 |
| Brookfield | Cook County | Chicago | village | IL | Midwest | 1 |
| Warrenville | DuPage County | Chicago | city | IL | Midwest | 1 |
| Addison | DuPage County | Chicago | village | IL | Midwest | 1 |
| Bartlett | DuPage County | Chicago | village | IL | Midwest | 1 |
| Carol Stream | DuPage County | Chicago | village | IL | Midwest | 1 |
| Westmont | DuPage County | Chicago | village | IL | Midwest | 1 |
| Elburn | Kane County | Chicago | village | IL | Midwest | 1 |
| South Elgin | Kane County | Chicago | village | IL | Midwest | 1 |
| Deerfield | Lake County | Chicago | village | IL | Midwest | 1 |
| Homer Glen | Will County | Chicago | village | IL | Midwest | 1 |
| Plainfield | Will County | Chicago | village | IL | Midwest | 1 |
| New Lenox | Will County | Chicago | village | IL | Midwest | 1 |
| St. John | Lake County | Chicago | town | IN | Midwest | 1 |
| Hammond | Lake County | Chicago | city | IN | Midwest | 1 |

[13]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[14] |
|---|---|---|---|---|---|---|
| Oxford | Butler County | Cincinnati | city | OH | Midwest | 1 |
| Blue Ash | Hamilton County | Cincinnati | city | OH | Midwest | 1 |
| Mariemont | Hamilton County | Cincinnati | village | OH | Midwest | 1 |
| Silverton | Hamilton County | Cincinnati | village | OH | Midwest | 1 |
| Fairview Park | Cuyahoga County | Cleveland | city | OH | Midwest | 1 |
| Berea | Cuyahoga County | Cleveland | city | OH | Midwest | 1 |
| South Euclid | Cuyahoga County | Cleveland | city | OH | Midwest | 1 |
| Painesville | Lake County | Cleveland | city | OH | Midwest | 1 |
| Medina | Medina County | Cleveland | city | OH | Midwest | 1 |
| Ravenna | Portage County | Cleveland | city | OH | Midwest | 1 |
| Concord | Delaware County | Columbus | township | OH | Midwest | 1 |
| Westerville | Franklin County | Columbus | city | OH | Midwest | 1 |
| Gahanna | Franklin County | Columbus | city | OH | Midwest | 1 |
| Worthington | Franklin County | Columbus | city | OH | Midwest | 1 |
| Circleville | Pickaway County | Columbus | city | OH | Midwest | 1 |
| Davison | Genesee County | Detroit | township | MI | Midwest | 1 |
| Grand Blanc | Genesee County | Detroit | township | MI | Midwest | 1 |
| Sterling Heights | Macomb County | Detroit | city | MI | Midwest | 1 |
| Mount Clemens | Macomb County | Detroit | city | MI | Midwest | 1 |
| Macomb | Macomb County | Detroit | township | MI | Midwest | 1 |
| Troy | Oakland County | Detroit | city | MI | Midwest | 1 |
| Oak Park | Oakland County | Detroit | city | MI | Midwest | 1 |
| West Bloomfield | Oakland County | Detroit | township | MI | Midwest | 1 |
| Lake Orion | Oakland County | Detroit | village | MI | Midwest | 1 |
| Fenton | Oakland County | Detroit | city | MI | Midwest | 1 |
| Wixom | Oakland County | Detroit | city | MI | Midwest | 1 |
| Ferndale | Oakland County | Detroit | city | MI | Midwest | 1 |
| Port Huron | St. Clair County | Detroit | township | MI | Midwest | 1 |
| Riverview | Wayne County | Detroit | city | MI | Midwest | 1 |
| Woodhaven | Wayne County | Detroit | city | MI | Midwest | 1 |
| Trenton | Wayne County | Detroit | city | MI | Midwest | 1 |

[14]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[15] |
|---|---|---|---|---|---|---|
| Grosse Pointe Woods | Wayne County | Detroit | city | MI | Midwest | 1 |
| Rockford | Kent County | Grand Rapids | city | MI | Midwest | 1 |
| Grandville | Kent County | Grand Rapids | city | MI | Midwest | 1 |
| Byron | Kent County | Grand Rapids | township | MI | Midwest | 1 |
| Fernandina Beach | Nassau County | Jacksonville | city | FL | South | 1 |
| Merriam | Johnson County | Kansas City | city | KS | Midwest | 1 |
| El Segundo | Los Angeles County | Los Angeles | city | CA | West | 1 |
| Lakewood | Los Angeles County | Los Angeles | city | CA | West | 1 |
| Bellflower | Los Angeles County | Los Angeles | city | CA | West | 1 |
| San Fernando | Los Angeles County | Los Angeles | city | CA | West | 1 |
| Bell | Los Angeles County | Los Angeles | city | CA | West | 1 |
| Paramount | Los Angeles County | Los Angeles | city | CA | West | 1 |
| Bell Gardens | Los Angeles County | Los Angeles | city | CA | West | 1 |
| Garden Grove | Orange County | Los Angeles | city | CA | West | 1 |
| Fontana | San Bernardino County | Los Angeles | city | CA | West | 1 |
| Ontario | San Bernardino County | Los Angeles | city | CA | West | 1 |
| Clarksville | Clark County | Louisville | town | IN | Midwest | 1 |
| North Lauderdale | Broward County | Miami | city | FL | South | 1 |
| Miramar | Broward County | Miami | city | FL | South | 1 |
| Sunny Isles Beach | Miami-Dade County | Miami | city | FL | South | 1 |
| North Miami Beach | Miami-Dade County | Miami | city | FL | South | 1 |
| Miami Shores | Miami-Dade County | Miami | village | FL | South | 1 |
| Lantana | Palm Beach County | Miami | town | FL | South | 1 |
| Saint Michael | Wright County | Minneapolis | city | MN | Midwest | 1 |
| Waconia | Carver County | Minneapolis | city | MN | Midwest | 1 |
| Mendota Heights | Dakota County | Minneapolis | city | MN | Midwest | 1 |
| Apple Valley | Dakota County | Minneapolis | city | MN | Midwest | 1 |
| Crystal | Hennepin County | Minneapolis | city | MN | Midwest | 1 |
| New Hope | Hennepin County | Minneapolis | city | MN | Midwest | 1 |

[15]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[16] |
|---|---|---|---|---|---|---|
| Brooklyn Center | Hennepin County | Minneapolis | city | MN | Midwest | 1 |
| Robbinsdale | Hennepin County | Minneapolis | city | MN | Midwest | 1 |
| Roseville | Ramsey County | Minneapolis | city | MN | Midwest | 1 |
| Bayport | Washington County | Minneapolis | city | MN | Midwest | 1 |
| Woodbury | Washington County | Minneapolis | city | MN | Midwest | 1 |
| Monticello | Wright County | Minneapolis | city | MN | Midwest | 1 |
| Mount Juliet | Wilson County | Nashville | city | TN | South | 1 |
| East Haven | New Haven County | New Haven | town | CT | Northeast | 1 |
| Ocoee | Orange County | Orlando | city | FL | South | 1 |
| Port Hueneme | Ventura County | Oxnard | city | CA | West | 1 |
| Citrus Heights | Sacramento County | Sacramento | city | CA | West | 1 |
| South Salt Lake | Salt Lake County | Salt Lake City | city | UT | West | 1 |
| National City | San Diego County | San Diego | city | CA | West | 1 |
| Dublin | Alameda County | San Francisco | city | CA | West | 1 |
| Alton | Madison County | St. Louis | city | IL | Midwest | 1 |
| Glen Carbon | Madison County | St. Louis | village | IL | Midwest | 1 |
| Edwardsville | Madison County | St. Louis | city | IL | Midwest | 1 |
| Highland | Madison County | St. Louis | city | IL | Midwest | 1 |
| Clearwater | Pinellas County | Tampa | city | FL | South | 1 |
| Hampton | Rockingham County | Boston | town | NH | Northeast | 2 |
| Dover | Strafford County | Boston | city | NH | Northeast | 2 |
| North Collins | Erie County | Buffalo | town | NY | Northeast | 2 |
| Springville | Erie County | Buffalo | village | NY | Northeast | 2 |
| Elma | Erie County | Buffalo | town | NY | Northeast | 2 |
| Porter | Niagara County | Buffalo | town | NY | Northeast | 2 |
| Somerset | Niagara County | Buffalo | town | NY | Northeast | 2 |
| Niagara Falls | Niagara County | Buffalo | city | NY | Northeast | 2 |
| Statesville | Iredell County | Charlotte | city | NC | South | 2 |
| Huntersville | Mecklenburg County | Charlotte | town | NC | South | 2 |
| Waxhaw | Union County | Charlotte | town | NC | South | 2 |
| Glendale Heights | DuPage County | Chicago | village | IL | Midwest | 2 |

[16]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[17] |
|---|---|---|---|---|---|---|
| Northfield | Cook County | Chicago | village | IL | Midwest | 2 |
| Park Ridge | Cook County | Chicago | city | IL | Midwest | 2 |
| Streamwood | Cook County | Chicago | village | IL | Midwest | 2 |
| Flossmoor | Cook County | Chicago | village | IL | Midwest | 2 |
| Hoffman Estates | Cook County | Chicago | village | IL | Midwest | 2 |
| Wilmette | Cook County | Chicago | village | IL | Midwest | 2 |
| River Forest | Cook County | Chicago | village | IL | Midwest | 2 |
| Northbrook | Cook County | Chicago | village | IL | Midwest | 2 |
| Elmhurst | DuPage County | Chicago | city | IL | Midwest | 2 |
| West Chicago | DuPage County | Chicago | city | IL | Midwest | 2 |
| Woodridge | DuPage County | Chicago | village | IL | Midwest | 2 |
| Hinsdale | DuPage County | Chicago | village | IL | Midwest | 2 |
| St. Charles | DuPage County | Chicago | city | IL | Midwest | 2 |
| Geneva | Kane County | Chicago | city | IL | Midwest | 2 |
| Carpentersville | Kane County | Chicago | village | IL | Midwest | 2 |
| Yorkville | Kendall County | Chicago | city | IL | Midwest | 2 |
| Wauconda | Lake County | Chicago | village | IL | Midwest | 2 |
| Lincolnshire | Lake County | Chicago | village | IL | Midwest | 2 |
| Vernon Hills | Lake County | Chicago | village | IL | Midwest | 2 |
| Grayslake | Lake County | Chicago | village | IL | Midwest | 2 |
| Joliet | Will County | Chicago | city | IL | Midwest | 2 |
| Romeoville | Will County | Chicago | village | IL | Midwest | 2 |
| De Motte | Jasper County | Chicago | town | IN | Midwest | 2 |
| Crown Point | Lake County | Chicago | city | IN | Midwest | 2 |
| Symmes | Hamilton County | Cincinnati | township | OH | Midwest | 2 |
| Middletown | Butler County | Cincinnati | city | OH | Midwest | 2 |
| Cincinnati | Hamilton County | Cincinnati | city | OH | Midwest | 2 |
| Montgomery | Hamilton County | Cincinnati | city | OH | Midwest | 2 |
| Madeira | Hamilton County | Cincinnati | city | OH | Midwest | 2 |
| Lebanon | Warren County | Cincinnati | city | OH | Midwest | 2 |
| Springboro | Warren County | Cincinnati | city | OH | Midwest | 2 |

[17]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[18] |
|---|---|---|---|---|---|---|
| Broadview Heights | Cuyahoga County | Cleveland | city | OH | Midwest | 2 |
| Beachwood | Cuyahoga County | Cleveland | city | OH | Midwest | 2 |
| Mayfield Heights | Cuyahoga County | Cleveland | city | OH | Midwest | 2 |
| Mentor | Lake County | Cleveland | city | OH | Midwest | 2 |
| Delaware | Delaware County | Columbus | city | OH | Midwest | 2 |
| Federal Heights | Adams County | Denver | city | CO | West | 2 |
| Thornton | Adams County | Denver | city | CO | West | 2 |
| Aurora | Arapahoe County | Denver | city | CO | West | 2 |
| Superior | Boulder County | Denver | town | CO | West | 2 |
| Parker | Douglas County | Denver | town | CO | West | 2 |
| Lone Tree | Douglas County | Denver | city | CO | West | 2 |
| Castle Rock | Douglas County | Denver | town | CO | West | 2 |
| Lakewood | Jefferson County | Denver | city | CO | West | 2 |
| Wheat Ridge | Jefferson County | Denver | city | CO | West | 2 |
| Greeley | Weld County | Denver | city | CO | West | 2 |
| Erie | Weld County | Denver | town | CO | West | 2 |
| Gaines | Genesee County | Detroit | township | MI | Midwest | 2 |
| Shelby | Macomb County | Detroit | township | MI | Midwest | 2 |
| Utica | Macomb County | Detroit | city | MI | Midwest | 2 |
| Birmingham | Oakland County | Detroit | city | MI | Midwest | 2 |
| Highland | Oakland County | Detroit | township | MI | Midwest | 2 |
| Waterford | Oakland County | Detroit | township | MI | Midwest | 2 |
| Beverly Hills | Oakland County | Detroit | village | MI | Midwest | 2 |
| Clawson | Oakland County | Detroit | city | MI | Midwest | 2 |
| Van Buren | Wayne County | Detroit | township | MI | Midwest | 2 |
| Grand Rapids | Kent County | Grand Rapids | township | MI | Midwest | 2 |
| Walker | Kent County | Grand Rapids | city | MI | Midwest | 2 |
| Gaines | Kent County | Grand Rapids | township | MI | Midwest | 2 |
| Winston-Salem | Forsyth County | Greensboro | city | NC | South | 2 |
| Greensboro | Guilford County | Greensboro | city | NC | South | 2 |
| Plainville | Hartford County | Hartford | town | CT | Northeast | 2 |

[18]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[19] |
|---|---|---|---|---|---|---|
| South Windsor | Hartford County | Hartford | town | CT | Northeast | 2 |
| Bloomfield | Hartford County | Hartford | town | CT | Northeast | 2 |
| Marlborough | Hartford County | Hartford | town | CT | Northeast | 2 |
| Columbia | Tolland County | Hartford | town | CT | Northeast | 2 |
| Ellington | Tolland County | Hartford | town | CT | Northeast | 2 |
| Andover | Tolland County | Hartford | town | CT | Northeast | 2 |
| Avon | Hendricks County | Indianapolis | town | IN | Midwest | 2 |
| Greenfield | Hancock County | Indianapolis | city | IN | Midwest | 2 |
| Plainfield | Hendricks County | Indianapolis | town | IN | Midwest | 2 |
| Greenwood | Johnson County | Indianapolis | city | IN | Midwest | 2 |
| Beech Grove | Marion County | Indianapolis | city | IN | Midwest | 2 |
| Shelbyville | Shelby County | Indianapolis | city | IN | Midwest | 2 |
| Gardner | Johnson County | Kansas City | city | KS | Midwest | 2 |
| Leavenworth | Leavenworth County | Kansas City | city | KS | Midwest | 2 |
| La Mirada | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Monterey Park | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Whittier | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Arcadia | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Carson | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Pomona | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Palmdale | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Baldwin Park | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Commerce | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Lomita | Los Angeles County | Los Angeles | city | CA | West | 2 |
| South Gate | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Downey | Los Angeles County | Los Angeles | city | CA | West | 2 |
| San Marino | Los Angeles County | Los Angeles | city | CA | West | 2 |
| Laguna Hills | Orange County | Los Angeles | city | CA | West | 2 |
| Stanton | Orange County | Los Angeles | city | CA | West | 2 |
| Rancho Santa Margarita | Orange County | Los Angeles | city | CA | West | 2 |

[19]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[20] |
|---|---|---|---|---|---|---|
| Placentia | Orange County | Los Angeles | city | CA | West | 2 |
| Seal Beach | Orange County | Los Angeles | city | CA | West | 2 |
| La Habra | Orange County | Los Angeles | city | CA | West | 2 |
| Fullerton | Orange County | Los Angeles | city | CA | West | 2 |
| Beaumont | Riverside County | Los Angeles | city | CA | West | 2 |
| La Quinta | Riverside County | Los Angeles | city | CA | West | 2 |
| Coachella | Riverside County | Los Angeles | city | CA | West | 2 |
| Colton | San Bernardino County | Los Angeles | city | CA | West | 2 |
| Upland | San Bernardino County | Los Angeles | city | CA | West | 2 |
| South Miami | Miami-Dade County | Miami | city | FL | South | 2 |
| Davie | Broward County | Miami | town | FL | South | 2 |
| Deerfield Beach | Broward County | Miami | city | FL | South | 2 |
| Hollywood | Broward County | Miami | city | FL | South | 2 |
| Plantation | Broward County | Miami | city | FL | South | 2 |
| Pompano Beach | Broward County | Miami | city | FL | South | 2 |
| Aventura | Miami-Dade County | Miami | city | FL | South | 2 |
| Champlin | Hennepin County | Minneapolis | city | MN | Midwest | 2 |
| Elko New Market | Scott County | Minneapolis | city | MN | Midwest | 2 |
| Ham Lake | Anoka County | Minneapolis | city | MN | Midwest | 2 |
| Chanhassen | Carver County | Minneapolis | city | MN | Midwest | 2 |
| South St. Paul | Dakota County | Minneapolis | city | MN | Midwest | 2 |
| Princeton | Mille Lacs County | Minneapolis | city | MN | Midwest | 2 |
| North Oaks | Ramsey County | Minneapolis | city | MN | Midwest | 2 |
| New Brighton | Ramsey County | Minneapolis | city | MN | Midwest | 2 |
| Goodlettsville | Davidson County | Nashville | city | TN | South | 2 |
| Springfield | Robertson County | Nashville | city | TN | South | 2 |
| Murfreesboro | Rutherford County | Nashville | city | TN | South | 2 |
| Cheshire | New Haven County | New Haven | town | CT | Northeast | 2 |
| New Haven | New Haven County | New Haven | city | CT | Northeast | 2 |

[20]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[21] |
|---|---|---|---|---|---|---|
| Edgewater | Bergen County | New York | borough | NJ | Northeast | 2 |
| Bloomfield | Essex County | New York | township | NJ | Northeast | 2 |
| Peekskill | Westchester County | New York | city | NY | Northeast | 2 |
| Newburgh | Orange County | New York | city | NY | Northeast | 2 |
| Rye | Westchester County | New York | city | NY | Northeast | 2 |
| Williamsburg | Williamsburg city County | Norfolk-Virginia Beach | city | VA | South | 2 |
| Mount Dora | Lake County | Orlando | city | FL | South | 2 |
| Orlando | Orange County | Orlando | city | FL | South | 2 |
| Maitland | Orange County | Orlando | city | FL | South | 2 |
| Kissimmee | Osceola County | Orlando | city | FL | South | 2 |
| Sandy | Clackamas County | Portland OR | city | OR | West | 2 |
| Milwaukie | Clackamas County | Portland OR | city | OR | West | 2 |
| St. Helens | Columbia County | Portland OR | city | OR | West | 2 |
| Troutdale | Multnomah County | Portland OR | city | OR | West | 2 |
| Portland | Multnomah County | Portland OR | city | OR | West | 2 |
| Hillsboro | Washington County | Portland OR | city | OR | West | 2 |
| Camas | Clark County | Portland OR | city | WA | West | 2 |
| Clayton | Johnston County | Raleigh | town | NC | South | 2 |
| Smithfield | Johnston County | Raleigh | town | NC | South | 2 |
| Raleigh | Wake County | Raleigh | city | NC | South | 2 |
| Colonial Heights | Colonial Heights city County | Richmond | city | VA | South | 2 |
| Hopewell | Hopewell city County | Richmond | city | VA | South | 2 |
| Hilton | Monroe County | Rochester | village | NY | Northeast | 2 |
| Fairport | Monroe County | Rochester | village | NY | Northeast | 2 |
| Farmington | Ontario County | Rochester | town | NY | Northeast | 2 |
| Canandaigua | Ontario County | Rochester | city | NY | Northeast | 2 |
| Macedon | Wayne County | Rochester | town | NY | Northeast | 2 |
| Walworth | Wayne County | Rochester | town | NY | Northeast | 2 |
| Galen | Wayne County | Rochester | town | NY | Northeast | 2 |

[21]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[22] |
|---|---|---|---|---|---|---|
| Lincoln | Placer County | Sacramento | city | CA | West | 2 |
| Rocklin | Placer County | Sacramento | city | CA | West | 2 |
| Cottonwood Heights | Salt Lake County | Salt Lake City | city | UT | West | 2 |
| El Cajon | San Diego County | San Diego | city | CA | West | 2 |
| La Mesa | San Diego County | San Diego | city | CA | West | 2 |
| Emeryville | Alameda County | San Francisco | city | CA | West | 2 |
| San Leandro | Alameda County | San Francisco | city | CA | West | 2 |
| Concord | Contra Costa County | San Francisco | city | CA | West | 2 |
| San Ramon | Contra Costa County | San Francisco | city | CA | West | 2 |
| East Palo Alto | San Mateo County | San Francisco | city | CA | West | 2 |
| Des Moines | King County | Seattle | city | WA | West | 2 |
| Burien | King County | Seattle | city | WA | West | 2 |
| Mercer Island | King County | Seattle | city | WA | West | 2 |
| Edmonds | Snohomish County | Seattle | city | WA | West | 2 |
| Monroe | Snohomish County | Seattle | city | WA | West | 2 |
| Arlington | Snohomish County | Seattle | city | WA | West | 2 |
| Everett | Snohomish County | Seattle | city | WA | West | 2 |
| Collinsville | Madison County | St. Louis | city | IL | Midwest | 2 |
| Chouteau | Madison County | St. Louis | township | IL | Midwest | 2 |
| O'Fallon | St. Clair County | St. Louis | city | IL | Midwest | 2 |
| Largo | Pinellas County | Tampa | city | FL | South | 2 |
| Culpeper | Culpeper County | Washington | town | VA | South | 2 |
| Vienna | Fairfax County | Washington | town | VA | South | 2 |
| Fairfax | Fairfax city County | Washington | city | VA | South | 2 |
| Manassas | Manassas city County | Washington | city | VA | South | 2 |
| Union City | Fulton County | Atlanta | city | GA | South | 3 |
| Canton | Cherokee County | Atlanta | city | GA | South | 3 |
| Marietta | Cobb County | Atlanta | city | GA | South | 3 |
| Smyrna | Cobb County | Atlanta | city | GA | South | 3 |
| Kennesaw | Cobb County | Atlanta | city | GA | South | 3 |

[22]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[23] |
|---|---|---|---|---|---|---|
| Newnan | Coweta County | Atlanta | city | GA | South | 3 |
| Decatur | DeKalb County | Atlanta | city | GA | South | 3 |
| Johns Creek | Fulton County | Atlanta | city | GA | South | 3 |
| Milton | Fulton County | Atlanta | city | GA | South | 3 |
| Sugar Hill | Gwinnett County | Atlanta | city | GA | South | 3 |
| Lawrenceville | Gwinnett County | Atlanta | city | GA | South | 3 |
| Snellville | Gwinnett County | Atlanta | city | GA | South | 3 |
| Duluth | Gwinnett County | Atlanta | city | GA | South | 3 |
| McDonough | Henry County | Atlanta | city | GA | South | 3 |
| Covington | Newton County | Atlanta | city | GA | South | 3 |
| San Marcos | Hays County | Austin | city | TX | South | 3 |
| Aberdeen | Harford County | Baltimore | city | MD | South | 3 |
| Homewood | Jefferson County | Birmingham | city | AL | South | 3 |
| Vestavia Hills | Jefferson County | Birmingham | city | AL | South | 3 |
| Mansfield | Bristol County | Boston | town | MA | Northeast | 3 |
| Somerset | Bristol County | Boston | town | MA | Northeast | 3 |
| Andover | Essex County | Boston | town | MA | Northeast | 3 |
| Medford | Middlesex County | Boston | city | MA | Northeast | 3 |
| Holliston | Middlesex County | Boston | town | MA | Northeast | 3 |
| Ashland | Middlesex County | Boston | town | MA | Northeast | 3 |
| Lexington | Middlesex County | Boston | town | MA | Northeast | 3 |
| Burlington | Middlesex County | Boston | town | MA | Northeast | 3 |
| Hopkinton | Middlesex County | Boston | town | MA | Northeast | 3 |
| Woburn | Middlesex County | Boston | city | MA | Northeast | 3 |
| Weymouth | Norfolk County | Boston | city | MA | Northeast | 3 |
| Norwood | Norfolk County | Boston | town | MA | Northeast | 3 |
| Norwell | Plymouth County | Boston | town | MA | Northeast | 3 |
| Whitman | Plymouth County | Boston | town | MA | Northeast | 3 |
| Revere | Suffolk County | Boston | city | MA | Northeast | 3 |
| Fitchburg | Worcester County | Boston | city | MA | Northeast | 3 |
| Barre | Worcester County | Boston | town | MA | Northeast | 3 |

[23]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[24] |
|---|---|---|---|---|---|---|
| Fort Mill | York County | Charlotte | town | SC | South | 3 |
| Florence | Boone County | Cincinnati | city | KY | South | 3 |
| Newport | Campbell County | Cincinnati | city | KY | South | 3 |
| Covington | Kenton County | Cincinnati | city | KY | South | 3 |
| Allen | Collin County | Dallas-Fort Worth | city | TX | South | 3 |
| Richardson | Dallas County | Dallas-Fort Worth | city | TX | South | 3 |
| Duncanville | Dallas County | Dallas-Fort Worth | city | TX | South | 3 |
| Sachse | Dallas County | Dallas-Fort Worth | city | TX | South | 3 |
| Coppell | Dallas County | Dallas-Fort Worth | city | TX | South | 3 |
| Mesquite | Dallas County | Dallas-Fort Worth | city | TX | South | 3 |
| Grand Prairie | Dallas County | Dallas-Fort Worth | city | TX | South | 3 |
| Addison | Dallas County | Dallas-Fort Worth | town | TX | South | 3 |
| Lancaster | Dallas County | Dallas-Fort Worth | city | TX | South | 3 |
| Carrollton | Denton County | Dallas-Fort Worth | city | TX | South | 3 |
| Little Elm | Denton County | Dallas-Fort Worth | city | TX | South | 3 |
| Greenville | Hunt County | Dallas-Fort Worth | city | TX | South | 3 |
| Forney | Kaufman County | Dallas-Fort Worth | city | TX | South | 3 |
| Weatherford | Parker County | Dallas-Fort Worth | city | TX | South | 3 |
| Benbrook | Tarrant County | Dallas-Fort Worth | city | TX | South | 3 |
| Euless | Tarrant County | Dallas-Fort Worth | city | TX | South | 3 |
| Hurst | Tarrant County | Dallas-Fort Worth | city | TX | South | 3 |
| Arlington | Tarrant County | Dallas-Fort Worth | city | TX | South | 3 |
| Watauga | Tarrant County | Dallas-Fort Worth | city | TX | South | 3 |
| Bedford | Tarrant County | Dallas-Fort Worth | city | TX | South | 3 |
| Hagerstown | Washington County | Hagerstown | city | MD | South | 3 |
| Freeport | Brazoria County | Houston | city | TX | South | 3 |
| Rosenberg | Fort Bend County | Houston | city | TX | South | 3 |
| Pasadena | Harris County | Houston | city | TX | South | 3 |
| Conroe | Montgomery County | Houston | city | TX | South | 3 |
| Kansas City | Cass County | Kansas City | city | MO | Midwest | 3 |
| Gladstone | Clay County | Kansas City | city | MO | Midwest | 3 |

[24]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[25] |
|---|---|---|---|---|---|---|
| Lake Havasu City | Mohave County | Las Vegas | city | AZ | West | 3 |
| Shepherdsville | Bullitt County | Louisville | city | KY | South | 3 |
| Cedarburg | Ozaukee County | Milwaukee | city | WI | Midwest | 3 |
| Mequon | Ozaukee County | Milwaukee | city | WI | Midwest | 3 |
| Norway | Racine County | Milwaukee | town | WI | Midwest | 3 |
| Racine | Racine County | Milwaukee | city | WI | Midwest | 3 |
| Rochester | Racine County | Milwaukee | village | WI | Midwest | 3 |
| Sussex | Waukesha County | Milwaukee | village | WI | Midwest | 3 |
| Hartland | Waukesha County | Milwaukee | village | WI | Midwest | 3 |
| Oconomowoc | Waukesha County | Milwaukee | city | WI | Midwest | 3 |
| Brookfield | Waukesha County | Milwaukee | city | WI | Midwest | 3 |
| River Falls | Pierce County | Minneapolis | city | WI | Midwest | 3 |
| Chickasha | Grady County | Oklahoma City | city | OK | South | 3 |
| Guthrie | Logan County | Oklahoma City | city | OK | South | 3 |
| Edmond | Oklahoma County | Oklahoma City | city | OK | South | 3 |
| Choctaw | Oklahoma County | Oklahoma City | city | OK | South | 3 |
| Warminster | Bucks County | Philadelphia | township | PA | Northeast | 3 |
| Phoenixville | Chester County | Philadelphia | borough | PA | Northeast | 3 |
| West Chester | Chester County | Philadelphia | borough | PA | Northeast | 3 |
| West Goshen | Chester County | Philadelphia | township | PA | Northeast | 3 |
| Marple | Delaware County | Philadelphia | township | PA | Northeast | 3 |
| Avondale | Maricopa County | Phoenix | city | AZ | West | 3 |
| Surprise | Maricopa County | Phoenix | city | AZ | West | 3 |
| Eloy | Pinal County | Phoenix | city | AZ | West | 3 |
| Harrison | Allegheny County | Pittsburgh | township | PA | Northeast | 3 |
| Wilkinsburg | Allegheny County | Pittsburgh | borough | PA | Northeast | 3 |
| Plum | Allegheny County | Pittsburgh | borough | PA | Northeast | 3 |
| Upper St. Clair | Allegheny County | Pittsburgh | township | PA | Northeast | 3 |
| Penn Hills | Allegheny County | Pittsburgh | township | PA | Northeast | 3 |
| Monroeville | Allegheny County | Pittsburgh | city | PA | Northeast | 3 |
| West Mifflin | Allegheny County | Pittsburgh | borough | PA | Northeast | 3 |

[25]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

| COMMUNITY | COUNTY | METROPOLITAN AREA | JURISDICTION TYPE | STATE | REGION | MH FRIENDLY TIERS[26] |
|---|---|---|---|---|---|---|
| Wilkins | Allegheny County | Pittsburgh | township | PA | Northeast | 3 |
| Bethel Park | Allegheny County | Pittsburgh | city | PA | Northeast | 3 |
| Center | Beaver County | Pittsburgh | township | PA | Northeast | 3 |
| Cranberry | Butler County | Pittsburgh | township | PA | Northeast | 3 |
| Butler | Butler County | Pittsburgh | township | PA | Northeast | 3 |
| North Strabane | Washington County | Pittsburgh | township | PA | Northeast | 3 |
| Donora | Washington County | Pittsburgh | borough | PA | Northeast | 3 |
| Lincoln | Providence County | Providence | town | RI | Northeast | 3 |
| Tiverton | Newport County | Providence | town | RI | Northeast | 3 |
| Universal City | Bexar County | San Antonio | city | TX | South | 3 |
| Schertz | Guadalupe County | San Antonio | city | TX | South | 3 |
| Seguin | Guadalupe County | San Antonio | city | TX | South | 3 |
| St. Peters | St. Charles County | St. Louis | city | MO | Midwest | 3 |
| O'Fallon | St. Charles County | St. Louis | city | MO | Midwest | 3 |
| St. Charles | St. Charles County | St. Louis | city | MO | Midwest | 3 |
| Shrewsbury | St. Louis County | St. Louis | city | MO | Midwest | 3 |
| Manchester | St. Louis County | St. Louis | city | MO | Midwest | 3 |
| Ballwin | St. Louis County | St. Louis | city | MO | Midwest | 3 |
| Clayton | St. Louis County | St. Louis | city | MO | Midwest | 3 |
| Maryland Heights | St. Louis County | St. Louis | city | MO | Midwest | 3 |
| Richmond Heights | St. Louis County | St. Louis | city | MO | Midwest | 3 |
| Creve Coeur | St. Louis County | St. Louis | city | MO | Midwest | 3 |
| Hyattsville | Prince Georges County | Washington | city | MD | South | 3 |

[26]Note that all jurisdictions in Tier 1 are also in Tiers 2 and 3, all jurisdictions in Tier 2 are in Tier 3, however the opposite is not true. In other words, jurisdictions labeled in the table as Tier 2 are those that are in Tier 2 but not in Tier 1 and those labeled as Tier 3 are jurisdictions in Tier 3 but not in Tiers 1 and 2. Therefore, all jurisdictions in the table are in Tier 3. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

## Exhibit B.2: MH Market Opportunities by Metropolitan Area

| METROPOLITAN AREA[27] | "MORTGAGE-READY" CONSUMERS | LMI "MORTGAGE-READY" CONSUMERS |
|---|---|---|
| Akron, OH | 71,000 | 51,000 |
| Atlanta-Sandy Springs-Roswell, GA | 705,000 | 545,000 |
| Austin-Round Rock, TX | 323,000 | 263,000 |
| Baltimore-Columbia-Towson, MD | 329,000 | 290,000 |
| Birmingham-Hoover, AL | 95,000 | 65,000 |
| Boston-Cambridge-Newton, MA-NH | 837,000 | 754,000 |
| Boulder, CO | 54,000 | 47,000 |
| Buffalo-Cheektowaga-Niagara Falls, NY | 131,000 | 99,000 |
| Charlotte-Concord-Gastonia, NC-SC | 292,000 | 219,000 |
| Chicago-Naperville-Elgin, IL-IN-WI | 1,295,000 | 1,030,000 |
| Cincinnati, OH-KY-IN | 221,000 | 172,000 |
| Cleveland-Elyria, OH | 211,000 | 147,000 |
| Columbus, OH | 249,000 | 196,000 |
| Dallas-Fort Worth-Arlington, TX | 897,000 | 687,000 |
| Denver-Aurora-Lakewood, CO | 418,000 | 348,000 |
| Detroit-Warren-Dearborn, MI | 498,000 | 369,000 |
| Flint, MI | 32,000 | 21,000 |
| Grand Rapids-Wyoming, MI | 117,000 | 89,000 |
| Greeley, CO | 34,000 | 27,000 |
| Greensboro-High Point, NC | 70,000 | 49,000 |
| Hagerstown-Martinsburg, MD-WV | 23,000 | 18,000 |
| Hartford-West Hartford-East Hartford, CT | 149,000 | 131,000 |
| Houston-The Woodlands-Sugar Land, TX | 811,000 | 600,000 |
| Indianapolis-Carmel-Anderson, IN | 202,000 | 153,000 |
| Jacksonville, FL | 156,000 | 110,000 |
| Kansas City, MO-KS | 229,000 | 180,000 |
| Lake Havasu City-Kingman, AZ | 13,000 | 7,000 |
| Los Angeles-Long Beach-Anaheim, CA | 2,417,000 | 1,833,000 |
| Louisville/Jefferson County, KY-IN | 115,000 | 87,000 |
| Manchester-Nashua, NH | 56,000 | 50,000 |

[27] Some metropolitan areas cover multiple MH-friendly jurisdictions and may be in multiple states.

| METROPOLITAN AREA[28] | "MORTGAGE-READY" CONSUMERS | LMI "MORTGAGE-READY" CONSUMERS |
|---|---|---|
| Miami-Fort Lauderdale-West Palm Beach, FL | 874,000 | 574,000 |
| Milwaukee-Waukesha-West Allis, WI | 182,000 | 143,000 |
| Minneapolis-St. Paul-Bloomington, MN-WI | 478,000 | 421,000 |
| Nashville-Davidson--Murfreesboro--Franklin, TN | 222,000 | 166,000 |
| New Haven-Milford, CT | 108,000 | 92,000 |
| New York-Newark-Jersey City, NY-NJ-PA | 3,398,000 | 2,797,000 |
| Oklahoma City, OK | 126,000 | 91,000 |
| Orlando-Kissimmee-Sanford, FL | 331,000 | 226,000 |
| Oxnard-Thousand Oaks-Ventura, CA | 128,000 | 110,000 |
| Philadelphia-Camden-Wilmington, PA-NJ-DE-MD | 750,000 | 639,000 |
| Phoenix-Mesa-Scottsdale, AZ | 530,000 | 395,000 |
| Pittsburgh, PA | 264,000 | 197,000 |
| Portland-Vancouver-Hillsboro, OR-WA | 365,000 | 302,000 |
| Providence-Warwick, RI-MA | 196,000 | 167,000 |
| Racine, WI | 17,000 | 15,000 |
| Raleigh, NC | 182,000 | 152,000 |
| Richmond, VA | 138,000 | 113,000 |
| Riverside-San Bernardino-Ontario, CA | 564,000 | 445,000 |
| Rochester, NY | 120,000 | 89,000 |
| Sacramento--Roseville--Arden-Arcade, CA | 324,000 | 265,000 |
| Salt Lake City, UT | 177,000 | 146,000 |
| San Antonio-New Braunfels, TX | 237,000 | 167,000 |
| San Diego-Carlsbad, CA | 568,000 | 459,000 |
| San Francisco-Oakland-Hayward, CA | 923,000 | 815,000 |
| Seattle-Tacoma-Bellevue, WA | 670,000 | 588,000 |
| St. Louis, MO-IL | 276,000 | 211,000 |
| Tampa-St. Petersburg-Clearwater, FL | 326,000 | 214,000 |

[28] Some metropolitan areas cover multiple MH-friendly jurisdictions and may be in multiple states.

| METROPOLITAN AREA[29] | "MORTGAGE-READY" CONSUMERS | LMI "MORTGAGE-READY" CONSUMERS |
|---|---|---|
| Virginia Beach-Norfolk-Newport News, VA-NC | 176,000 | 136,000 |
| Washington-Arlington-Alexandria, DC-VA-MD-WV | 985,000 | 890,000 |
| Winston-Salem, NC | 57,000 | 39,000 |
| Worcester, MA-CT | 118,000 | 104,000 |

**Note:** "Mortgage ready" numbers are rounded up to the nearest thousand. LMI refers to consumers with incomes below 100% of the Area Median Income.

**Source:** Mortgage-readiness is based on Freddie Mac calculations using anonymized credit bureau data for January 2021. MH-friendly areas are based on a review of zoning data retrieved from the National Longitudinal Land Use Survey 2019, the Manufactured Housing Institute, the Wharton Residential Land Use Regulatory Index 2018, and the U.S. Department of Housing and Urban Development.

## Exhibit B.3: Detailed Profile of MH Friendly Metropolitan Areas

| STATE | METROPOLITAN AREA | REGION | HOMEOWNERSHIP RATE | INCOME | WHITE RESIDENTS (%) | HISPANIC RESIDENTS (%) | BLACK RESIDENTS (%) | ASIAN RESIDENTS (%) | AMERICAN INDIAN RESIDENTS (%) | BLACK AND HISPANIC "MORTGAGE READY" CONSUMERS |
|---|---|---|---|---|---|---|---|---|---|---|
| CA | Los Angeles-Long Beach-Anaheim, CA | West | 48.5 | 69,805 | 28.5 | 44.6 | 6.1 | 16.7 | 0.2 | 44.5 |
| CA | Oxnard-Thousand Oaks-Ventura, CA | West | 62.8 | 67,422 | 42.8 | 43.3 | 1.6 | 7.7 | 0.2 | 45.1 |
| CA | Riverside-San Bernardino-Ontario, CA | West | 65.8 | 45,365 | 29.4 | 51.6 | 7.0 | 7.7 | 0.4 | 56.8 |
| CA | Sacramento--Roseville--Arden-Arcade, CA | West | 63.4 | 61,852 | 48.3 | 22.2 | 6.6 | 15.4 | 0.5 | 25.9 |
| CA | San Diego-Carlsbad, CA | West | 57.8 | 66,266 | 43.1 | 33.9 | 4.4 | 12.5 | 0.4 | 35.9 |

[29] Some metropolitan areas cover multiple MH-friendly jurisdictions and may be in multiple states.

| STATE | METROPOLITAN AREA | REGION | HOMEOWNERSHIP RATE | INCOME | WHITE RESIDENTS (%) | HISPANIC RESIDENTS (%) | BLACK RESIDENTS (%) | ASIAN RESIDENTS (%) | AMERICAN INDIAN RESIDENTS (%) | BLACK AND HISPANIC "MORTGAGE READY" CONSUMERS |
|---|---|---|---|---|---|---|---|---|---|---|
| CA | San Francisco-Oakland-Hayward, CA | West | 53.0 | 111,050 | 36.2 | 22.9 | 6.8 | 27.9 | 0.2 | 26.5 |
| CT | New Haven-Milford, CT | Northeast | 63.4 | 60,092 | 58.9 | 19.7 | 12.8 | 4.3 | 0.2 | 27.2 |
| FL | Jacksonville, FL | South | 64.8 | 55,125 | 59.4 | 10.2 | 20.8 | 4.2 | 0.2 | 26.4 |
| FL | Miami-Fort Lauderdale-West Palm Beach, FL | South | 60.6 | 64,190 | 29.1 | 45.9 | 18.8 | 2.6 | 0.1 | 62.9 |
| FL | Orlando-Kissimmee-Sanford, FL | South | 64.2 | 48,223 | 43.5 | 32.0 | 14.5 | 4.6 | 0.2 | 44.1 |
| FL | Tampa-St. Petersburg-Clearwater, FL | South | 72.2 | 52,291 | 59.5 | 20.5 | 11.2 | 3.9 | 0.2 | 29.8 |
| IL | Chicago-Naperville-Elgin, IL-IN-WI | Midwest | 66.0 | 67,671 | 50.2 | 23.3 | 16.1 | 7.1 | 0.1 | 31.0 |
| IL | St. Louis, MO-IL | Midwest | 71.1 | 60,844 | 70.3 | 3.8 | 17.8 | 2.9 | 0.2 | 15.3 |
| IN | Louisville/Jefferson County, KY-IN | Midwest | 69.3 | 55,676 | 71.5 | 6.5 | 14.6 | 2.5 | 0.2 | 16.8 |
| KS | Kansas City, MO-KS | Midwest | 66.7 | 58,057 | 68.5 | 10.5 | 11.8 | 3.2 | 0.4 | 17.9 |
| MI | Detroit-Warren-Dearborn, MI | Midwest | 66.7 | 58,356 | 63.7 | 5.0 | 21.7 | 4.8 | 0.2 | 17.6 |
| MI | Flint, MI | Midwest | 56.9 | 46,152 | 72.3 | 3.6 | 19.6 | 1.0 | 0.5 | 15.6 |
| MI | Grand Rapids-Wyoming, MI | Midwest | 71.8 | 54,037 | 75.7 | 10.2 | 6.7 | 2.8 | 0.3 | 14.6 |

| STATE | METROPOLITAN AREA | REGION | HOMEOWNERSHIP RATE | INCOME | WHITE RESIDENTS (%) | HISPANIC RESIDENTS (%) | BLACK RESIDENTS (%) | ASIAN RESIDENTS (%) | AMERICAN INDIAN RESIDENTS (%) | BLACK AND HISPANIC "MORTGAGE READY" CONSUMERS |
|---|---|---|---|---|---|---|---|---|---|---|
| MN | Minneapolis-St. Paul-Bloomington, MN-WI | Midwest | 73.0 | 67,214 | 71.8 | 6.6 | 9.0 | 7.2 | 0.5 | 13.6 |
| NH | Boston-Cambridge-Newton, MA-NH | Northeast | 61.2 | 85,724 | 66.6 | 11.8 | 6.9 | 8.6 | 0.1 | 18.9 |
| NH | Manchester-Nashua, NH | Northeast | 67.1 | 66,548 | 83.7 | 7.3 | 2.4 | 3.9 | 0.2 | 10.1 |
| OH | Akron, OH | Midwest | 69.5 | 54,843 | 76.4 | 2.4 | 12.4 | 3.7 | 0.1 | 10.6 |
| OH | Cincinnati, OH-KY-IN | Midwest | 71.1 | 59,607 | 75.9 | 4.2 | 12.0 | 3.1 | 0.1 | 13.1 |
| OH | Cleveland-Elyria, OH | Midwest | 66.3 | 58,846 | 67.4 | 6.4 | 19.3 | 2.6 | 0.1 | 17.0 |
| OH | Columbus, OH | Midwest | 65.6 | 56,252 | 69.1 | 5.2 | 15.5 | 4.9 | 0.2 | 17.8 |
| TN | Nashville-Davidson--Murfreesboro--Franklin, TN | South | 69.8 | 62,076 | 68.3 | 9.7 | 14.2 | 3.1 | 0.2 | 24.0 |
| UT | Salt Lake City, UT | West | 68.0 | 58,008 | 68.3 | 19.2 | 1.8 | 5.8 | 0.6 | 18.7 |
| CO | Boulder, CO | West | 61.6 | 79,649 | 77.1 | 14.0 | 1.1 | 4.9 | 0.3 | 12.4 |
| CO | Denver-Aurora-Lakewood, CO | West | 62.9 | 69,822 | 61.2 | 23.3 | 5.3 | 4.7 | 0.5 | 23.0 |
| CO | Greeley, CO | West | 64.3 | 52,054 | 65.6 | 29.4 | 1.1 | 1.6 | 0.3 | 30.1 |
| CT | Hartford-West Hartford-East Hartford, CT | Northeast | 70.1 | 67,343 | 63.9 | 15.5 | 10.8 | 5.5 | 0.1 | 20.0 |
| IN | Indianapolis-Carmel-Anderson, IN | Midwest | 70.0 | 60,431 | 68.2 | 8.4 | 14.8 | 3.9 | 0.2 | 21.4 |

| STATE | METROPOLITAN AREA | REGION | HOMEOWNERSHIP RATE | INCOME | WHITE RESIDENTS (%) | HISPANIC RESIDENTS (%) | BLACK RESIDENTS (%) | ASIAN RESIDENTS (%) | AMERICAN INDIAN RESIDENTS (%) | BLACK AND HISPANIC "MORTGAGE READY" CONSUMERS |
|---|---|---|---|---|---|---|---|---|---|---|
| NC | Charlotte-Concord-Gastonia, NC-SC | South | 73.3 | 56,682 | 57.8 | 11.7 | 21.5 | 4.3 | 0.3 | 31.3 |
| NC | Greensboro-High Point, NC | South | 65.8 | 47,171 | 55.1 | 10.0 | 26.4 | 4.1 | 0.4 | 35.6 |
| NC | Raleigh, NC | South | 68.2 | 60,884 | 58.3 | 12.0 | 17.9 | 7.0 | 0.3 | 27.7 |
| NC | Winston-Salem, NC | South | 53.5 | 48,151 | 65.4 | 11.5 | 17.0 | 1.8 | 0.3 | 28.7 |
| NJ | New York-Newark-Jersey City, NY-NJ-PA | Northeast | 50.9 | 82,322 | 43.3 | 25.2 | 14.9 | 12.4 | 0.2 | 33.0 |
| NY | Buffalo-Cheektowaga-Niagara Falls, NY | Northeast | 70.1 | 55,777 | 73.0 | 5.8 | 12.5 | 4.2 | 0.6 | 11.8 |
| NY | Rochester, NY | Northeast | 67.5 | 56,477 | 72.9 | 8.2 | 11.1 | 3.2 | 0.2 | 13.2 |
| OR | Portland-Vancouver-Hillsboro, OR-WA | West | 62.5 | 62,603 | 68.7 | 13.2 | 2.9 | 7.6 | 0.6 | 15.9 |
| VA | Richmond, VA | South | 66.5 | 61,148 | 55.3 | 7.9 | 27.4 | 4.4 | 0.3 | 31.8 |
| VA | Virginia Beach-Norfolk-Newport News, VA-NC | South | 65.8 | 53,310 | 52.3 | 7.5 | 29.6 | 4.2 | 0.3 | 37.5 |
| VA | Washington-Arlington-Alexandria, DC-VA-MD-WV | South | 67.9 | 76,771 | 42.3 | 17.1 | 24.1 | 10.9 | 0.2 | 37.2 |
| WA | Seattle-Tacoma-Bellevue, WA | West | 59.4 | 80,420 | 57.9 | 11.2 | 6.0 | 16.3 | 0.7 | 15.4 |

| STATE | METROPOLITAN AREA | REGION | HOMEOWNERSHIP RATE | INCOME | WHITE RESIDENTS (%) | HISPANIC RESIDENTS (%) | BLACK RESIDENTS (%) | ASIAN RESIDENTS (%) | AMERICAN INDIAN RESIDENTS (%) | BLACK AND HISPANIC "MORTGAGE READY" CONSUMERS |
|---|---|---|---|---|---|---|---|---|---|---|
| AL | Birmingham-Hoover, AL | South | 76.0 | 55,074 | 59.4 | 5.8 | 29.3 | 1.8 | 0.2 | 28.8 |
| AZ | Lake Havasu City-Kingman, AZ | West | 70.4 | 36,529 | 76.6 | 16.9 | 0.7 | 1.0 | 1.8 | 22.0 |
| AZ | Phoenix-Mesa-Scottsdale, AZ | West | 67.9 | 51,851 | 53.6 | 30.4 | 5.5 | 4.4 | 1.8 | 31.8 |
| GA | Atlanta-Sandy Springs-Roswell, GA | South | 66.4 | 58,773 | 43.7 | 12.0 | 33.2 | 6.6 | 0.2 | 40.3 |
| MA | Providence-Warwick, RI-MA | Northeast | 64.8 | 60,897 | 71.6 | 14.1 | 4.7 | 3.1 | 0.3 | 20.5 |
| MA | Worcester, MA-CT | Northeast | 65.9 | 61,741 | 71.8 | 12.9 | 4.7 | 4.9 | 0.2 | 18.0 |
| MD | Baltimore-Columbia-Towson, MD | South | 70.7 | 66,695 | 52.7 | 7.6 | 28.2 | 6.3 | 0.2 | 29.6 |
| MD | Hagerstown-Martinsburg, MD-WV | South | 69.3 | 47,759 | 82 | 4.5 | 8.6 | 1.4 | 0.1 | 14.2 |
| OK | Oklahoma City, OK | South | 68.3 | 52,688 | 59.3 | 14.9 | 10.1 | 3.3 | 3.5 | 22.5 |
| PA | Philadelphia-Camden-Wilmington, PA-NJ-DE-MD | Northeast | 69.2 | 69,705 | 59.1 | 10.2 | 19.8 | 6.6 | 0.1 | 22.5 |
| PA | Pittsburgh, PA | Northeast | 69.8 | 63,675 | 82.2 | 2.2 | 8.3 | 2.9 | 0.1 | 9.1 |
| TX | Austin-Round Rock, TX | South | 65.4 | 64,913 | 49.6 | 31.9 | 6.6 | 7.1 | 0.2 | 28.7 |
| TX | Dallas-Fort Worth-Arlington, TX | South | 64.7 | 61,554 | 42.8 | 29.3 | 15.7 | 8.0 | 0.3 | 35.1 |

| STATE | METROPOLITAN AREA | REGION | HOMEOWNERSHIP RATE | INCOME | WHITE RESIDENTS (%) | HISPANIC RESIDENTS (%) | BLACK RESIDENTS (%) | ASIAN RESIDENTS (%) | AMERICAN INDIAN RESIDENTS (%) | BLACK AND HISPANIC "MORTGAGE READY" CONSUMERS |
|---|---|---|---|---|---|---|---|---|---|---|
| TX | Houston-The Woodlands-Sugar Land, TX | South | 65.3 | 59,893 | 33.7 | 37.5 | 17.0 | 8.3 | 0.2 | 44.5 |
| TX | San Antonio-New Braunfels, TX | South | 64.2 | 50,022 | 32.8 | 54.3 | 6.5 | 2.9 | 0.2 | 49.8 |
| WI | Milwaukee-Waukesha-West Allis, WI | Midwest | 58.5 | 60,499 | 64.1 | 11.6 | 15.9 | 4.2 | 0.3 | 18.9 |
| WI | Racine, WI | Midwest | 68.2 | 53,094 | 71.1 | 13.6 | 11.2 | 1.3 | 0.5 | 20.1 |

**Note:** Income refers to income per capita.
**Source:** See Reference Section for a list of data sources for income, homeownership rate and race. Mortgage-readiness is based on Freddie Mac calculations using anonymized credit bureau data for January 2021.