



**Rural Housing Coalition**  
*of New York*



The Role of

# Manufactured Housing

In New York's  
Affordable  
Housing Crisis



Funded by a grant from Enterprise Community Partners

**NEW YORK STATE MANUFACTURED HOME COMMUNITIES REPORT**

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June 14, 2023

Commissioned by

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## **Manufactured homes have a significant footprint in the nation’s housing stock, and they are a viable affordable housing option. They should be prominently featured in discussions, policies and plans to address the current housing crisis.**

This report aims to provide state policymakers with relevant statistics on manufactured housing communities (MHCs) in New York State, as well as recommendations to ensure that mobile homes remain a viable affordable housing option – particularly in rural communities – throughout the state.

### **Did you know?**

- There are 192,890 manufactured housing units in New York State – making up 2.4% of the state’s total housing stock.
- In rural areas of the state, that percentage jumps to 10.3% of housing stock with 100,802 manufactured housing units.
- More than 1/3 of manufactured housing units are located in manufactured housing communities (as opposed to individually owned sites).
- In 2019, New York State had 1,811 manufactured housing communities, in 48 of the 62 counties in the state.
- Saratoga, Dutchess, and Ulster Counties have the highest concentrations of manufactured housing communities.
- The number of manufactured housing communities has declined by 12% since 1989.

As state policymakers continue to tackle the affordable housing shortage in New York, we urge them to work toward a solution that addresses the needs of the whole state and not just downstate. That solution should include ways to preserve manufactured housing communities as an affordable housing option. To that end, the Rural Housing Coalition recommends the following:

- Better enforcement and compliance with existing laws and regulations regarding the **registration of mobile home communities** with the NYS Department of Taxation and Finance.
- Legislation to support **expanded opportunities for residents to purchase their manufactured housing communities** in the case of sale of the property regardless of any change of use.
- Legislation that would **foster and fund the purchase of development rights** of manufactured housing communities using open space and farmland conservation programs as a model.
- Increase mortgage recording taxes on MHC sales to for-profit entities to **establish a resident displacement fund**.
- **Increase funding for the Mobile and Manufactured Home Replacement Program** administered by HCR from the current \$5 million to \$10 million, and increase the amount allocated per home from \$100,000 to \$200,000.

## INTRODUCTION

The years 2021 and 2022 are unprecedented years for price increases in the US housing market. Increases in both owner-occupied and rental housing costs reached their highest in decades (JCHS, 2022; Bailey, 2022). Although these increases began to slow down in late 2022 due to a combination of policy initiatives and market adjustments, they persist and disproportionately affect minorities (OBPS NYS, 2022) and low-income families (Bailey, 2022; JCHS, 2022). This is true at the national level and in New York State.

Although the outlook for the development and preservation of affordable housing often seems bleak, some housing experts view the short-term housing outlook as promising, e.g., “Demographic shifts are favorable, unemployment is low, and wage growth remains strong. Conditions on the supply side are also encouraging, with supply-chain delays diminishing and a record number of homes set for completion in the coming months (JCHS, 2022).” Government policy can help promote the development and preservation of affordable housing.

Various solutions are offered to address the immediate effects of the housing crisis promptly and directly, especially on low-income and minority households. These include, but are not limited to, rental assistance, land use regulations and zoning reform, and additional housing units and preservation of existing ones (Bailey, 2022; JCHS, 2022).

When talking about adding affordable housing units or maintaining existing ones, it is noteworthy that manufactured housing (MH) is minimally included in the conversation. For instance, in the 2022 State of the Nation’s Housing report of Harvard University’s Center of Joint housing Studies, manufactured housing was only mentioned four times in a more than 20,000-word report (JCHS, 2022). Of the \$34.6 million Community Development Block Grants announced by the NYS Governor’s Office last November 2022, only 4.5% (\$4.6M) were allocated to rehabilitation or replacement of manufactured homes (Governor’s Press Office NYS, 2022).

Perhaps one reason why not much emphasis is given to manufactured housing is its small share in the total housing, i.e., represents 6.3% of the nation’s housing stock (Fannie Mae, 2020). However, a more detailed look at manufactured housing numbers point to its importance in the housing market. For instance, while manufactured housing represents 6.3% of the nation’s total housing stock, it is about 14% of the housing stock in rural areas. According to the Manufactured Housing Institute, there are 8.4 million manufactured homes in the US that house 22 million Americans (MHI, 2022). About 27% of these homes are placed in a community, and there are about 43,000 manufactured home communities (MHCs) in the US (Revere, P. 2022).

Housing experts view manufactured homes as significant contributors to affordable housing. Among others, they are cheaper to build and have lower median monthly all-in cost compared to site-built homes (Fannie Mae, 2020; MHI 2022), and they appreciate in value (although less than single-family homes), and (Goodman et al, 2018).

In New York State, according to the ACS 2012-2016 housing data, there are a total of 192,890 MH units, which represents 2.4% of the state’s total housing stock of 8,191,568 (HAC, n.d.). Some 100,802 units are located in rural and small-town areas, which is 10.3% of the 737,313 units in rural and small town areas.



According to the New York State's Division of Housing and Community Renewal (DHCR), there were a total of 68,933 MH units located in MHCs. This means that around 36% of manufactured homes in NY State are located in MHCs.



If manufactured housing has a significant footprint in the nation's housing stock, and they are a viable affordable housing option, why then are they not prominently featured in discussions, policies and plans to address the current housing crisis? Among others, reasons for this include restrictive zoning, restrictive or unavailable funding, and lower appreciation (Goodman et al, 2018).

This research tried to locate studies on manufactured housing in general and MHCs in particular in New York State, but it was difficult to find them, other than a few short descriptions found in articles and papers that are more focused on the national picture and/or other states. It is important to have this information to undertake advocacy work to generate substantive and substantial support for the construction and maintenance of manufactured homes as an affordable housing option, especially for low-income and minority groups.

Fortunately, there is existing statewide historical data on manufactured homes located in MHCs. Even though the information is basic and lacking in a number of ways (e.g., rental cost), it is a good start.

## PURPOSE

- The purpose of the research was to conduct a census of mobile home parks from existing public documents to inform policymakers on the conditions, locations and demographics of mobile home parks.
- It also intended to review New York's opportunity to purchase law, N.Y. Real Prop. Law § 233-a.

## SOURCES

Two datasets generated by two New York state government agencies were utilized to gather information on the conditions, locations, and demographics of mobile home parks.

The first dataset is titled, Historic Manufactured Home Park Registrations: 1989-2019. It “captures the park name, address, and county in which a manufactured home park is located; the number of site capacity and number of occupied sites; and the name and contact number for the park owner/operator.” Prior to 2020, the dataset was built and maintained by the New York State Homes and Community Renewal’s (HCR) Division of Housing and Community Renewal (DHCR), as part of its mandate, DHCR oversaw the registration of these parks in accordance with NYS Real Property Law Section 233 sub-section (v.) which requires owners of manufactured home parks with three or more homes register their park with DHCR. Starting 2020, the NYS Department of Taxation and Finance (DTF) took on the task of managing these park registrations.



The second dataset named, Mobile Home Parks: Last Inspection, was downloaded from a Department of Health database “includes the date of the last inspection and violations of Part 17 of the New York State Code of Rules and Regulations that were identified during that inspection”.

Links to webpages that contained detailed descriptions of both datasets are cited in the bibliography at the end of the report.

We initially considered utilizing a third dataset, i.e., the one that contains mobile park-related registrations managed the NYS Department of Taxation and Finance (DTF). However, this was not pursued because the dataset is missing information from about one-third of the manufactured home parks in the state of New York.

We also conducted a document review of relevant materials; the reviewed documents are listed in the Bibliography at the end of the narrative.

## SUMMARY OF FINDINGS

1. Overall, the number of MHCs in NY State is declining over time and across regions of the state.
2. The extent of decline is not evenly experienced across regions. The decline is most pronounced in the North Country Region, while the least amount of decline occurred in the Finger Lakes Region.
3. The availability of MHC units is also decreasing, although at a slower rate compared to MHCs because the decline in the number of MHCs is partially offset by the increase in capacity, i.e., number of units per MHC.
4. The trend over time is having fewer but denser MHCs (i.e., more units per community). Overall, there was a 3% decrease in the number of MHC units between 1989 and 2019.
5. MHC capacity differs across regions. In 2019, four regions have more than 12,000 available MHC units (Finger Lakes Region, Capital Region, Western NY Region and Hudson Valley Region). On the other hand, New York City Region has the least number of available MHC units.
6. Regions have varying experiences when it comes to decreasing MHC capacity. The North Country Region has the largest decrease (15%) distantly followed by Long Island Region (7%) and Southern Tier Region (6%). The number of MHC units in the Mohawk Valley Region did not change between 1989 and 2019.
7. The number of occupied units differs across regions. In 2019, the four regions with the greatest number of available MHC units (Finger Lakes Region, Capital Region, Western NY Region and Hudson Valley Region) are also the top four regions when it comes to number of occupied units. New York City Region has the least number of occupied MHC units.
8. Occupancy rates differ across regions. Hudson Valley Region has the highest occupancy rate at 84% (i.e., occupied as a percentage of available MHCs), followed closely by Capital Region and Mohawk Valley. Central NY Region has the lowest occupancy rate (69%).
9. The change in occupancy between 1989 and 2019 varies significantly among regions. Finger Lake Region and Mohawk Valley have the highest increase in occupancy rate. On the other hand, Western NY Region and Long Island Region had the highest decrease in occupancy rate.
10. The decline in the number of MHCs is similar between MHCs in rural and urban communities.
11. The decrease in the number of MHC units between 1989 and 2019 in urban communities is larger than that of rural areas, i.e., 7% to 2%, respectively.
12. Rural communities experienced an increase in occupancy (2%) rate between 1989 and 2019, while urban areas had a decrease in occupancy rate (5%).
13. Aside from the region, other factors that are associated with differing occupancy rates include MHC capacity (number of MHC units), whether the park owner is also the operator, and the number of violations recorded by the health investigator.
14. Occupancy rate is not associated (or at best, weakly associated) with rural or urban location, and whether the park owner is also the operator.
15. New York's opportunity to purchase law, N.Y. Real Prop. Law § 233-a, is currently almost entirely ineffective. Its most fundamental flaw is that it requires the residents to be given the opportunity to purchase their community only when the buyer certifies that it intends to change the use of the land. This is exactly the point when the property because it has development value, is likely to be priced beyond the residents' reach. At the same time, New York's law denies the residents a purchase opportunity when the property is being sold for continuation as a MHC, denying them the opportunity to keep their community and become more economically stable.
16. New York's current law is additionally flawed in that, when it gives the residents the right to purchase the community, they can do so only by meeting the "identical" price, terms, and conditions as the community owner's third-party offer, making it easy for third-party buyers and community owners to preclude a sale to the residents by inserting unusual terms in their agreement. It also lacks any enforcement mechanism.

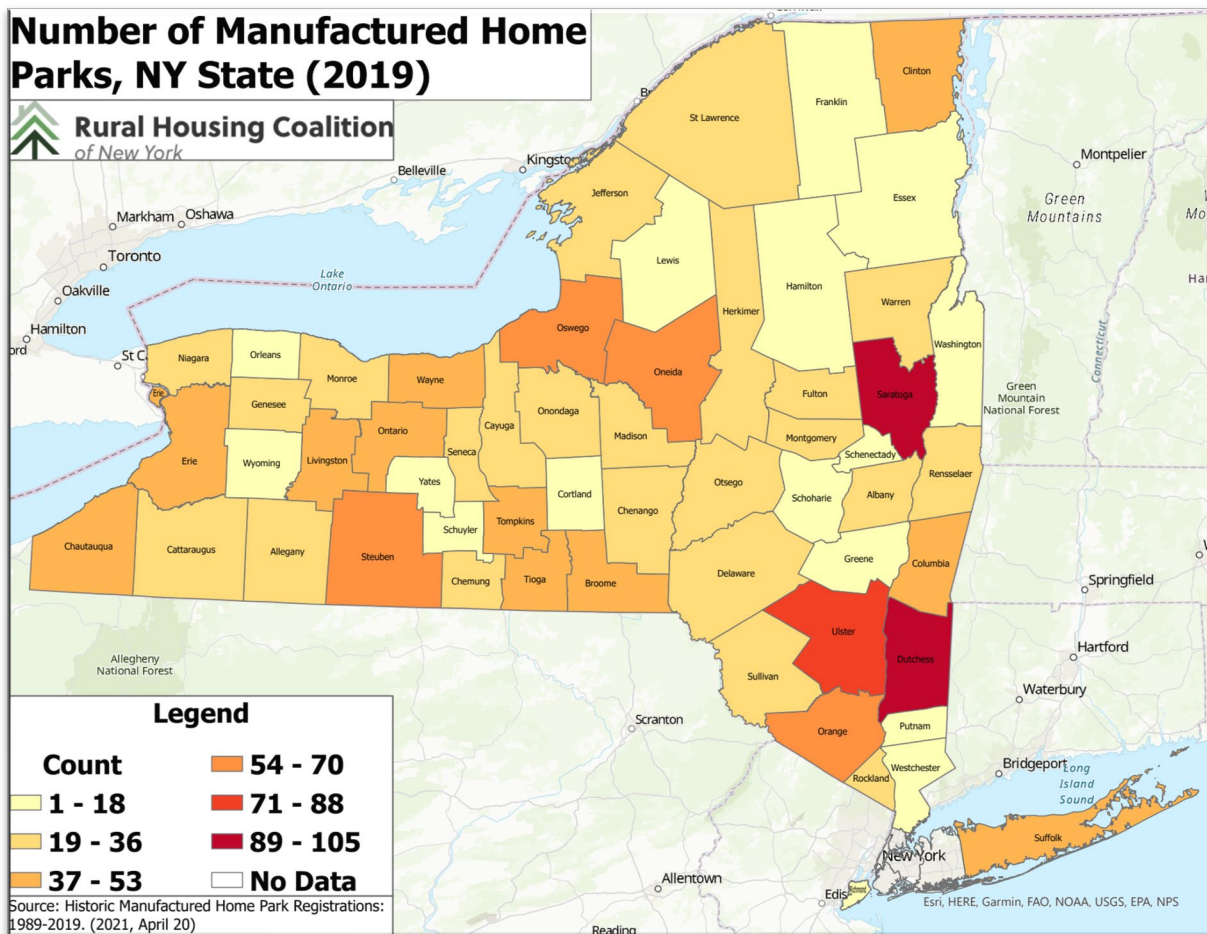


## SPECIFIC RESEARCH RESULTS

In 2019, there were 1,811 mobile home communities (MHCs) found in 48 of the 52 counties of the state of New York. The list of counties with number of MHCs in 2019 can be found in Appendix A.

Below is a map produced by the Rural Housing Coalition (RHC) that shows the concentration of MHCs across the state's counties.

*Figure 1: Number of MHCs by County, 2019*





The table below shows the distribution of MHCs across the 10 regions of the state and over a 31-year period.

***Table 1: Number of MHCs by Region, 1989-2019***

	Region										NY State
	Capital Region	Central NY	Finger Lakes	Hudson Valley	Long Island	Mohawk Valley	New York City	North Country	Southern Tier	Western NY	
1989	301 (3)	164 (8)	241 (4)	327 (1)	43 (9)	212 (6)	11 (10)	191 (7)	326 (2)	232 (5)	2,048
1990	304	169	246	334	44	218	12	192	335	240	2,094
1991	309	174	250	335	44	223	12	204	344	243	2,138
1992	311	177	252	334	44	229	12	210	350	242	2,161
1993	311	179	250	333	43	227	12	212	348	243	2,158
1994	308	177	248	335	43	225	12	205	349	237	2,139
1995	304	172	244	329	43	228	12	201	348	234	2,115
1996	304	176	247	330	42	230	12	208	348	234	2,131
1997	308	179	250	335	42	228	12	199	353	237	2,143
1998	306	181	248	330	41	225	12	196	353	237	2,129
1999	307	180	248	331	42	225	12	193	351	238	2,127
2000	309	179	251	329	42	224	12	190	351	236	2,123
2001	306	179	250	327	42	221	12	187	349	238	2,111
2002	307	180	251	327	42	220	12	186	348	237	2,110
2003	306	180	253	326	42	218	12	182	345	235	2,099
2004	307	182	254	324	42	220	12	177	350	235	2,103
2005	301	181	254	325	41	220	12	176	346	234	2,090
2006	301	177	251	318	41	217	12	167	341	232	2,057
2007	301	176	248	319	40	220	12	166	343	232	2,057
2008	299	171	242	320	40	217	12	164	337	226	2,028
2009	298	170	244	317	40	213	12	159	333	224	2,010
2010	294	170	244	314	40	214	12	156	330	222	1,996
2011	290	172	238	308	42	208	12	154	324	220	1,968
2012	289	169	241	308	42	204	12	149	316	217	1,947
2013	286	167	243	305	42	205	12	146	315	218	1,939
2014	283	165	242	306	42	202	12	144	310	215	1,921
2015	279	164	240	307	41	199	12	139	304	212	1,897
2016	278	161	238	304	41	198	12	138	301	209	1,880
2017	273	158	237	301	41	197	12	135	300	208	1,862
2018	265	156	237	286	41	192	12	133	295	204	1,821
2019	267 (3)	154 (7)	236 (4)	290 (2)	40 (9)	189 (6)	12 (10)	130 (8)	296 (1)	197 (5)	1,811
Net change	-11%	-6%	-2%	-11%	-7%	-11%	9%	-32%	-9%	-15%	-12%

In 1989 (earliest year when the state began gathering data on MHCs), there were a total of 2,048 MHCs in the state of NY. The number of MHCs went up and down then up again between 1989 and 2004. After that, the MHC numbers steadily decreased.

As of 2019 (latest year with complete data on MHCs from an official state government office), the total number of MHCs in the state is 1,811. This represents a net decrease of 12% in the number of MHCs between 1989 and 2019.

The Hudson Valley and Southern Tier Regions had the highest number of MHCs in 1989, while the New York City and Long Island Regions had the least number of MHCs. This pattern continues to be true in 2019.

The North Country Region experienced the highest percentage decrease in the number of MHCs between 1989 and 2019 (32% decrease) and distantly followed by the Western NY Region (15% decrease). The Finger Lakes Region had the lowest percentage decrease in the number of MHCs (2% decrease).

The next table provides a rural-urban distribution of MHCs numbers between 1989 and 2019. The Rural Housing Coalition considers an MHC as coming from a rural area if it belongs to a county where more than 50% of the population live in communities of 25,000 residents or less.

Most MHCs (between 83% and 84%) are in rural communities. This rural-to-urban proportion has not changed throughout the 31-year period from 1989 to 2019.

MHCs have units or plots of land where mobile homes are “parked.” An MHC’s housing capacity is defined as the number of units found in the park, regardless of whether the unit has a manufactured home sitting on it.

*Table 2: Number of MHCs by Rural vs. Urban Regions, 1989-2019*

	Rural vs Urban		Total
	Rural	Urban	
<b>1989</b>	1,699 (83%)	349 (17%)	2,048
<b>1990</b>	1,740	354	2,094
<b>1991</b>	1,785	353	2,138
<b>1992</b>	1,808	353	2,161
<b>1993</b>	1,804	354	2,158
<b>1994</b>	1,787	352	2,139
<b>1995</b>	1,771	344	2,115
<b>1996</b>	1,790	341	2,131
<b>1997</b>	1,798	345	2,143
<b>1998</b>	1,788	341	2,129
<b>1999</b>	1,786	341	2,127
<b>2000</b>	1,786	337	2,123
<b>2001</b>	1,775	336	2,111
<b>2002</b>	1,772	338	2,110
<b>2003</b>	1,762	337	2,099
<b>2004</b>	1,767	336	2,103
<b>2005</b>	1,758	332	2,090
<b>2006</b>	1,728	329	2,057
<b>2007</b>	1,731	326	2,057
<b>2008</b>	1,705	323	2,028
<b>2009</b>	1,687	323	2,010
<b>2010</b>	1,676	320	1,996
<b>2011</b>	1,649	319	1,968
<b>2012</b>	1,631	316	1,947
<b>2013</b>	1,621	318	1,939
<b>2014</b>	1,603	318	1,921
<b>2015</b>	1,580	317	1,897
<b>2016</b>	1,569	311	1,880
<b>2017</b>	1,553	309	1,862
<b>2018</b>	1,520	301	1,821
<b>2019</b>	1,509 (83%)	302 (17%)	1,811
<b>Net change</b>	-11%	-13%	-12%

Table 3 below provides a summary of the total capacity of MHCs in the state of New York from 1989 to 2019.

Table 3: MHC capacity, 1989-2019

Year	Average Number of Available Units per MHC (Column A)	Number of MHCs (Column B)	Number of Available MHC sites (Column A x Column B, adjusted for rounded off averages)
1989	42.23	2,048	86,494
1990	42.19	2,094	88,355
1991	41.65	2,138	89,040
1992	41.27	2,161	89,177
1993	41.56	2,158	89,696
1994	41.71	2,139	89,223
1995	41.94	2,115	88,710
1996	41.82	2,131	89,123
1997	41.90	2,143	89,783
1998	42.23	2,129	89,898
1999	42.35	2,127	90,079
2000	42.41	2,123	90,033
2001	42.62	2,111	89,979
2002	42.83	2,110	90,374
2003	42.91	2,099	90,066
2004	42.85	2,103	90,120
2005	42.99	2,090	89,856
2006	43.41	2,057	89,298
2007	43.33	2,057	89,130
2008	43.75	2,028	88,732
2009	43.90	2,010	88,240
2010	44.07	1,996	87,970
2011	44.46	1,968	87,505
2012	44.88	1,947	87,377
2013	45.17	1,939	87,592
2014	45.31	1,921	87,034
2015	45.76	1,897	86,812
2016	46.06	1,880	86,587
2017	46.26	1,862	86,136
2018	46.08	1,821	83,919
2019	46.34	1,811	83,929
<b>Net change</b>	<b>10%</b>	<b>-12%</b>	<b>-3%</b>

In 2019, the 1,811 MHCs in the state of New York had a total capacity of 83,929 sites. The total capacity has steadily declined since 2002, i.e., from 8,6494 units in 1989 to 83,929 units in 2019.

The net decline in the total number of units in MHCs is only 3% between 1989 and 2019, even if the number of MHCs declined by 12%. This is because the average site capacity of MHCs actually increased by 10% between 1989 and 2019 (from an average of 42.23 units in 1989 to an average of 46.34 units in 2019). The 12% decrease in the number of MHCs is partially offset by the 10% increase in the average number of units per MHC.

The extent to which the number of MHCs decreases and the average number units per MHC increases varies from one region to another, as shown by Tables 4 and 5 below.

**Table 4: MHC site capacity by region, 2019**

<b>Site Capacity, 2019</b>				
<b>Year</b>		<b>Average Number of Available Units per MHC (ranks in parentheses)</b>	<b>Number of MHCs</b>	<b>Number of Available MHC units (ranks in parentheses)</b>
<b>2019</b>	Capital Region	47.13 (5)	267	12,583 (2)
	Central NY	48.41 (4)	154	7,455 (6)
	Finger Lakes	54.23 (3)	236	12,799 (1)
	Hudson Valley	42.26 (6)	290	12,254 (4)
	Long Island	109.83 (1)	40	4,393 (8)
	Mohawk Valley	38.16 (8)	189	7,212 (7)
	New York City	39.92 (7)	12	479 (10)
	North Country	30.92 (10)	130	4,019 (9)
	Southern Tier	34.96 (9)	296	10,349 (5)
	Western NY	62.87 (2)	197	12,386 (3)
All Regions		46.34	1,811	83,929

**Table 5: Change in MHC site capacity by region, 1989 - 2019**

<b>Change in Site Capacity, 1989 - 2019</b>				
<b>Year</b>		<b>% Change in Average Number of Available Units per MHC</b>	<b>% Change in Number of MHCs</b>	<b>% change in Number of MHC units</b>
<b>Net change</b>	Capital Region	12%	-11%	-1%
	Central NY	5%	-6%	-1%
	Finger Lakes	7%	-2%	4%
	Hudson Valley	8%	-11%	-4%
	Long Island	0%	-7%	-7%
	Mohawk Valley	13%	-11%	0%
	New York City	-5%	9%	4%
	North Country	25%	-32%	-15%
	Southern Tier	4%	-9%	-6%
	Western NY	11%	-15%	-5%
All Regions		10%	-12%	-3%



Overall, there is not much change in the number of occupied MHC units over time, as shown in Table 6.

*Table 6: MHC occupancy, 1989-2019*

Year	Average Number of Occupied Units per MHC	Number of MHCs	Number of Occupied MHC units
1989	32.92	2,048	67,413
1990	32.86	2,094	68,801
1991	32.43	2,138	69,345
1992	32.13	2,161	69,441
1993	32.38	2,158	69,880
1994	32.49	2,139	69,492
1995	32.74	2,115	69,241
1996	32.61	2,131	69,496
1997	32.71	2,143	70,102
1998	32.64	2,129	69,496
1999	32.76	2,127	69,684
2000	32.83	2,123	69,703
2001	33.01	2,111	69,681
2002	33.21	2,110	70,076
2003	33.31	2,099	69,924
2004	33.34	2,103	70,113
2005	33.41	2,090	69,829
2006	33.80	2,057	69,528
2007	33.77	2,057	69,457
2008	34.23	2,028	69,428
2009	34.50	2,010	69,346
2010	34.70	1,996	69,261
2011	35.10	1,968	69,083
2012	35.48	1,947	69,084
2013	35.71	1,939	69,244
2014	35.96	1,921	69,083
2015	36.37	1,897	68,992
2016	36.67	1,880	68,933
2017	36.89	1,862	68,684
2018	36.85	1,821	67,100
2019	37.12	1,811	67,233
<b>Net change</b>	13%	-12%	0%

There are differences when it comes to the average number of units occupied between and among regions, as shown in Tables 7 and 8 below.

*Table 7: MHC site occupancy by region, 2019*

Site Occupancy, 2019				
Year		Average Number of Occupied Units per MHC	Number of MHCs	Number of Occupied MHC units
<b>2019</b>	Capital Region	38.94	267	10,396
	Central NY	33.36	154	5,138
	Finger Lakes	44.25	236	10,442
	Hudson Valley	35.34	290	10,250
	Long Island	90.60	40	3,624
	Mohawk Valley	31.60	189	5,972
	New York City	32.92	12	395
	North Country	23.40	130	3,042
	Southern Tier	27.93	296	8,266
	Western NY	49.28	197	9,708
	All Regions	37.12	1,811	67,233

*Table 8: Change in MHC site occupancy by region, 1989 - 2019*

Change in Site Occupancy, 1989 - 2019				
Year		% Change in Average Number of Occupied Units per MHC	% Change in Number of MHCs	% change in Number of Occupied MHC sites
<b>Net Change</b>	Capital Region	14%	-11%	1%
	Central NY	9%	-6%	2%
	Finger Lakes	10%	-2%	8%
	Hudson Valley	11%	-11%	-2%
	Long Island	1%	-7%	-6%
	Mohawk Valley	19%	-11%	6%
	New York City	-5%	9%	3%
	North Country	34%	-32%	-9%
	Southern Tier	9%	-9%	-1%
	Western NY	9%	-15%	-7%
	All Regions	13%	-12%	0%

Overall, there is not much difference in occupancy rates across time, as shown in Table 9 below.

*Table 9: MHC Occupancy Rate, 1989 - 2019*

<b>Year</b>	<b>Number of Occupied MHC sites</b>	<b>Number of Available MHC sites</b>	<b>Occupancy Rate</b>
<b>1989</b>	67,413	86,494	78%
<b>1990</b>	68,801	88,355	78%
<b>1991</b>	69,345	89,040	78%
<b>1992</b>	69,441	89,177	78%
<b>1993</b>	69,880	89,696	78%
<b>1994</b>	69,492	89,223	78%
<b>1995</b>	69,241	88,710	78%
<b>1996</b>	69,496	89,123	78%
<b>1997</b>	70,102	89,783	78%
<b>1998</b>	69,496	89,898	77%
<b>1999</b>	69,684	90,079	77%
<b>2000</b>	69,703	90,033	77%
<b>2001</b>	69,681	89,979	77%
<b>2002</b>	70,076	90,374	78%
<b>2003</b>	69,924	90,066	78%
<b>2004</b>	70,113	90,120	78%
<b>2005</b>	69,829	89,856	78%
<b>2006</b>	69,528	89,298	78%
<b>2007</b>	69,457	89,130	78%
<b>2008</b>	69,428	88,732	78%
<b>2009</b>	69,346	88,240	79%
<b>2010</b>	69,261	87,970	79%
<b>2011</b>	69,083	87,505	79%
<b>2012</b>	69,084	87,377	79%
<b>2013</b>	69,244	87,592	79%
<b>2014</b>	69,083	87,034	79%
<b>2015</b>	68,992	86,812	79%
<b>2016</b>	68,933	86,587	80%
<b>2017</b>	68,684	86,136	80%
<b>2018</b>	67,100	83,919	80%
<b>2019</b>	67,233	83,929	80%

However, Table 10 indicates that there are differences between regions.

*Table 10: MHC site occupancy rate by region, 2019*

Year	Number of Available MHC sites	Number of Occupied MHC sites	Occupancy Rate
Capital Region	12,583	10,396	83%
Central NY	7,455	5,138	69%
Finger Lakes	12,799	10,442	82%
Hudson Valley	12,254	10,250	84%
Long Island	4,393	3,624	82%
Mohawk Valley	7,212	5,972	83%
New York City	479	395	82%
North Country	4,019	3,042	76%
Southern Tier	10,349	8,266	80%
Western NY	12,386	9,708	78%
All Regions	83,929	67,233	80%

In 2019, majority of MHC units can be found in rural areas, i.e., 74%, compared to 26% in urban areas.

*Table 11: MHC site capacity for rural and urban communities, 2019*

MHC Site Capacity				
Year		Average Number of Available Units per MHC	Number of MHCs	Number of Available MHC sites
2019	Rural	40.89	1,509	61,710
	Urban	73.57	302	22,219
	Total	46.34	1,811	83,929

Between 1989 and 2019, the number of available MHC site in urban areas decreased by 7%, which is more than the decrease experienced in rural areas.

*Table 12: Change in MHC site capacity for rural and urban communities, 1989 - 2019*

Change in MHC Site Capacity				
Year		% Change in Average Number of Available Units per MHC	% Change in Number of MHCs	% Change in Number of Available MHC sites
Total	Rural	11%	-11%	-2%
	Urban	8%	-13%	-7%
	Total	10%	-12%	-3%



As can be seen in Tables 13 and 14, there are more occupied MHC units in the rural areas compared to rural areas, and that the occupancy rate increased in rural areas, but decreased in urban areas.

*Table 13: MHC site occupancy for rural and urban communities, 2019*

Site Capacity				
Year		Average Number of Occupied Units per MHC	Number of MHCs	Number of Occupied MHC sites
2019	Rural	32.98	1,509	49,761
	Urban	57.85	302	17,472
	Total	37.12	1,811	67,233

*Table 14: Change in MHC site occupancy for rural and urban communities, 1989 - 2019*

Site Capacity				
Year		% Change in Average Number of Available Units per MHC	% Change in Number of MHCs	% Change in Number of Available MHC sites
Net change	Rural	14%	-11%	2%
	Urban	10%	-13%	-5%
	Total	13%	-12%	0%

In 2019, there is not much of a difference in the occupancy rate between rural and urban areas.

*Table 15: MHC site occupancy rate for rural and urban areas, 2019*

Year	Number of Available MHC sites	Number of Occupied MHC sites	Occupancy Rate
<b>Rural</b>	61,710	49,761	81%
<b>Urban</b>	22,219	17,472	79%
<b>Total</b>	83,929	67,233	80%



In an effort to further understand factors affecting the current occupancy rate (i.e., in 2019), crosstabulations between occupancy rate and other factors (region, capacity, urban vs. rural location, whether or not the owner is also the operator). A measure of association was then computed to gauge association. The occupancy rates MHCs in the study were grouped as follows:

*Table 16: Occupancy rates (grouped)*

Occupancy rate, 2019	Number	Percent
<b>less than 60% occupancy</b>	349	19.3
<b>between 60 and less than 80% occupancy</b>	366	20.2
<b>between 80 and less than 95% occupancy</b>	531	29.3
<b>95% occupancy or higher</b>	565	31.2
<b>Total</b>	<b>1,811</b>	<b>100.0</b>

*Table 17: Occupancy rates (grouped) by region*

The table shows that there is a moderate association between occupancy rate of MHCs and the region where they are located. While a majority of the regions have occupancy rates that are between 80 and 100%, there are others a few that have a majority of MHCs with occupancy rates below 80%.

Occupancy	Capital Region	Central NY	Finger Lakes	Hudson Valley	Long Island	Mohawk Valley	New York City	North Country	Southern Tier	Western NY	Total
<b>less than 60%</b>	14.2%	29.2%	16.5%	15.9%	10.0%	21.7%	16.7%	26.2%	17.6%	24.4%	19.3%
<b>between 60 and less than 80%</b>	16.5%	33.1%	17.8%	14.1%	7.5%	17.5%	33.3%	26.2%	23.3%	22.8%	20.2%
<b>between 80 and less than 95%</b>	33.0%	21.4%	34.3%	26.6%	25.0%	32.3%	25.0%	27.7%	30.7%	25.9%	29.3%
<b>95% or higher</b>	36.3%	16.2%	31.4%	43.4%	57.5%	28.6%	25.0%	20.0%	28.4%	26.9%	31.2%
<b>Total</b>	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

- Cramer's V = .139

The table shows that there is a very weak association between occupancy rate of MHCs and whether they are in an urban or rural community, i.e., the percentage distribution across various occupancy rate groups is very similar.

*Table 18: Occupancy rates (grouped) by urban or rural community*

Occupancy	Rural	Urban	Total
less than 60%	19.3%	19.2%	19.3%
between 60 and less than 80%	21.0%	16.2%	20.2%
between 80 and less than 95%	28.9%	31.5%	29.3%
95% or higher	30.8%	33.1%	31.2%
Total	100.0%	100.0%	100.0%

- Cramer's V = .046

The table shows that there is a weak association between occupancy rate of MHCs and whether or not the owner is also the operator, i.e., the percentage distribution across various occupancy rate groups is similar between the two ownership types.

*Table 19: Occupancy rates (grouped) by owner type (also the operator or not)*

Occupancy	Owner is not the operator	Owner is also the operator	Total
less than 60%	19.3%	16.3%	23.1%
between 60 and less than 80%	21.0%	20.6%	19.7%
between 80 and less than 95%	28.9%	30.7%	27.5%
95% or higher	30.8%	32.4%	29.7%
Total	100.0%	100.0%	100.0%

- Cramer's V = .086

The table shows that there is a very weak association between occupancy rate of MHCs and the MHC capacity (or number of units available). There is no discernable pattern between capacity and occupancy. Except for MHCs with less than 10 units, a plurality of MHCs have occupancy rates between 80% and 95%.

*Table 20: Occupancy rates (grouped) by capacity (MHC units available)*

Occupancy	less than 10 units	10 - 19 units	20 - 39 units	40 - 79 units	80 units or more	Total
less than 60%	22.5%	19.5%	21.7%	18.2%	12.6%	19.3%
between 60 and less than 80%	19.8%	19.8%	19.4%	19.7%	23.1%	20.2%
between 80 and less than 95%	13.1%	31.8%	30.2%	34.9%	39.1%	29.3%
95% or higher	44.7%	28.9%	28.8%	27.2%	25.2%	31.2%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

- Gamma = .028

In 2019, a vast majority (i.e., at least 85%) of MHCs provide/have road maintenance, parking space, running water, sewage system. On the other hand, very few MHCs (i.e., less than 10%) provide/have storage, a playground, a pool, security guard, on-site food store, club house or laundry room.

*Table 21: Percentage of MHCs providing services and amenities*

Does the facility ...	1989	1999	2009	2019	Net difference (1989 & 2019)
... provide manufactured home setup?	16.3%	16.7%	17.7%	16.8%	0.50%
... provide manufactured home tiedowns?	10.0%	14.7%	17.7%	18.9%	8.90%
... allow home sales?	10.6%	14.3%	16.1%	17.6%	7.00%
... provide manufactured home maintenance?	13.3%	13.7%	13.6%	13.1%	-0.20%
... provide grounds maintenance?	43.6%	52.0%	58.0%	60.5%	16.90%
... provide road maintenance?	88.7%	90.9%	91.7%	92.9%	4.20%
... provide storage?	7.1%	7.7%	7.3%	6.8%	-0.30%
... have a playground?	12.9%	12.4%	10.4%	8.1%	-4.80%
... have parking space?	62.9%	79.7%	83.7%	85.2%	22.30%
... have running water?	96.8%	96.6%	95.8%	95.1%	-1.70%
... have a sewage system?	96.3%	97.6%	96.9%	96.1%	-0.20%
... have a beach?	0.6%	0.6%	0.3%	0.3%	-0.30%
... have a pool?	1.6%	1.2%	1.3%	1.2%	-0.40%
... provide waste management?	71.6%	68.2%	70.2%	74.9%	3.30%
... have security guards?	1.0%	1.2%	0.9%	0.4%	-0.60%
... have an on-site food store?	0.4%	0.6%	0.3%	0.2%	-0.20%
... have a clubhouse?	2.1%	2.6%	3.0%	3.4%	1.30%
... have a laundry room?	4.7%	3.9%	3.0%	2.6%	-2.10%
... have electricity?	35.8%	46.3%	47.7%	45.7%	9.90%
... have natural gas?	10.4%	19.7%	21.6%	24.1%	13.70%
... have propane gas?	8.9%	12.6%	12.3%	10.9%	2.00%
... provide a hookup for television/cable?	36.9%	46.1%	43.1%	36.9%	0.00%



The NY State’s Department of Health inspects MHCs for violations of Part 17 of the New York State Code of Rules and Regulations that were identified during that inspection. The table below shows the inspection results of MHCs that were active in 2019.

*Table 22: Total number of violations, 2019*

Number of Violations	Number	Percent
<b>No violations</b>	1,171	65.7
<b>1 to 2 violations</b>	446	25.0
<b>3 to 4 violations</b>	121	6.8
<b>5 or more violations</b>	45	2.5
<b>Total</b>	1783	100.0

Around two-thirds of the MHCs do not have a violation, and another one-fourth have 1 – 2 violations.

The inspector also records the main issue they identified during the inspection, and Table 23 provides the results.

*Table 23: Main issue, 2019*

Main Issue	Number	Percent
<b>None</b>	545	53.7
<b>Home conditions</b>	287	28.3
<b>Infrastructure conditions</b>	112	11.0
<b>Vacancies</b>	41	4.0
<b>Others</b>	30	3.0
<b>Total</b>	1015	100.0

Table 24 below cross-tabulates occupancy rate with the number of violations noted by the inspector.

*Table 24: Occupancy rate by number of violations, 2019*

	No violations	1 to 2 violations	3 to 4 violations	5 or more violations	Total
<b>Less than 60%</b>	17.5%	17.5%	23.1%	25.6%	18.1%
<b>60% to less than 80%</b>	20.5%	20.6%	29.8%	18.6%	21.1%
<b>80% to less than 95%</b>	27.8%	32.3%	28.1%	44.2%	29.4%
<b>95% or higher</b>	34.2%	29.6%	19.0%	11.6%	31.4%
<b>Total</b>	100.0%	100.0%	100.0%	100.0%	100.0%

- Gamma = -.109

The table indicates that there is a moderate negative association, i.e., MHCs with more violations tend to have lower occupancy rates.

Table 25 below cross-tabulates occupancy rate with the type of main inspection issue.

*Table 25: Occupancy rate by Home and Property Inspection (HPI) main issue, 2019*

	None	Home conditions	Infrastructure conditions	Vacancies	Others	Total
<b>Less than 60%</b>	10.8%	21.3%	17.0%	53.7%	30.0%	16.7%
<b>60% to less than 80%</b>	13.6%	31.4%	27.7%	14.6%	13.3%	20.2%
<b>80% to less than 95%</b>	36.1%	23.7%	26.8%	24.4%	16.7%	30.5%
<b>95% or higher</b>	39.4%	23.7%	28.6%	7.3%	40.0%	32.5%
<b>Total</b>	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

- Cramer's V = .200

The table shows a moderate association between the HPI main issue and occupancy. MHCs with no main issues or, to a lesser extent, infrastructure conditions, tend to have higher occupancy rates, compared to MHCs with issues related to vacancies, home conditions and other issues.

The table below cross-tabulates the number of violations by region. There is a slight to moderate association, i.e., MHCs located in certain regions tend to have less violations (e.g., Hudson Valley, Central NY) compared to others (e.g., Long Island Region, Southern Tier Region).

*Table 26: Number of violations by region, 2019*

	Capital Region	Central NY	Finger Lakes	Hudson Valley	Long Island	Mohawk Valley	New York City	North Country	Southern Tier	Western NY	Total
<b>No violations</b>	59.2%	74.7%	71.2%	79.6%	25.0%	71.0%	59.7%	68.3%	46.5%	65.7%	59.2%
<b>1 to 2 violations</b>	28.5%	17.5%	21.5%	18.2%	45.0%	22.0%	28.7%	22.8%	38.2%	25.0%	28.5%
<b>3 to 4 violations</b>	8.1%	7.8%	6.9%	1.8%	27.5%	6.5%	9.3%	5.5%	7.4%	6.8%	8.1%
<b>5 or more violations</b>	4.2%		0.4%	0.4%	2.5%	0.5%	2.3%	3.4%	7.8%	2.5%	4.2%
<b>Total</b>	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

- Cramer's V = .169





The next table cross-tabulates the number of violations by the rural or urban location of the MHCs. The table shows that there is very weak/minimal association, i.e., the rates of violation are very similar between MHCs in rural areas and their urban counterparts.

*Table 27: Number of violations by Rural or Urban Location, 2019*

	Rural	Urban	Total
<b>No violations</b>	65.3%	67.7%	65.7%
<b>1 to 2 violations</b>	25.6%	22.1%	25.0%
<b>3 to 4 violations</b>	6.8%	6.7%	6.8%
<b>5 or more violations</b>	2.3%	3.5%	2.5%
<b>Total</b>	100.0%	100.0%	100.0%

- Cramer’s V = .039

The last table cross-tabulates the number of violations by the owner type (owner is or is not also the operator). The table shows that there is very weak/minimal association, i.e., the rates of violation are very similar regardless of whether or not the MHC owner is also the operator.

*Table 28: Number of violations by Owner Type, 2019*

	Owner is not the operator	Owner is the operator	Total
<b>No violations</b>	64.8%	66.8%	65.7%
<b>1 to 2 violations</b>	26.5%	23.1%	25.0%
<b>3 to 4 violations</b>	6.5%	7.1%	6.8%
<b>5 or more violations</b>	2.2%	2.9%	2.5%
<b>Total</b>	100.0%	100.0%	100.0%

- Cramer’s V = .044

## CONCLUSIONS AND RECOMMENDATIONS

**Conclusion:** On the number of MHCs, MHC capacity and MHC occupancy

- Overall, there is a decline over time in the number of manufactured home communities (MHC) in New York State.
- This decline in the number of MH communities leads to a decline in availability of MH units, even if MH capacity has increased over time.
- It does not help that occupancy, overall, marginally increased over time.

**Recommendation:**

- Advocate for state and local policies to make it easier to purchase, set up and maintain MH units in MHCs by way of, but not limited to, adjusting land use regulations, access to affordable loans or outright grants for repair and replacement of MH units.
- In light of limited time and resources, focus should be on regions that are experiencing high rates of decline in the number of MHCs, MHC capacity and occupancy.
- There is no need to differentiate the approach between MHCs in rural areas and their urban counterparts because there is no significant difference in the decline of MHCs and MHC capacity between these locations. The only component where there could be a slight difference is on approaches to improve occupancy rates, i.e., more stress on MHCs in urban areas.

**Conclusion:** On inspection results and violations

- The number of violations and types of HPI issues are associated with MHC occupancy rates.

**Recommendation:**

- Minimizing violations and addressing vacancy issues could lead to improved occupancy rates.

**Conclusion:** On the review of N.Y. Real Prop. Law § 233-a

New York's opportunity to purchase law, N.Y. Real Prop. Law § 233-a, is currently almost entirely ineffective. Its most fundamental flaw is that it requires the residents to be given the opportunity to purchase their community only when the buyer certifies that it intends to change the use of the land. This is exactly the point when the property, because it has development value, is likely to be priced beyond the residents' reach. At the same time, New York's law denies the residents a purchase opportunity when the property is being sold for continuation as an MHC, denying them the opportunity to establish long-term, stable, and affordable housing.

**Recommendations:**

- To make New York's purchase opportunity law usable, it should be amended to:
  - Expand it to cover any sale of the community, not just a sale that will result in a change in use. (S.5881/A.5549) which has passed both chambers of the state legislature and is expected to be sent to the Governor for signature by the end of the year, would make this change, but the bill does not deal with the other flaws in New York's law).
  - Require the community owner to consider any offer made by the residents, not just one that is identical to the third-party offer, and to negotiate in good faith with them.
  - Provide for enforcement of the purchase opportunity requirements, by adding a substantial penalty for non-compliance and providing for public enforcement.



- New York’s law would also be enhanced by:
  - Specifically allowing the residents to assign their opportunity to purchase to a local or county government or agency, tribal government, housing authority, or nonprofit with expertise related to housing for the purpose of continuing the operation of the manufactured home community. This would give residents a wider range of purchase options.
  - Clarifying that, if the residents form a resident association to make an offer to purchase the community, the association must consist of “the owners of at least 51% of the homes within the manufactured home park that are occupied by the owner or a family member of the owner.” This would set a clear, objective standard for the existing 51% requirement.
  - This is a list of the most important changes that are necessary to make the existing statute at least usable. Among the many other steps that would improve the law are adding a strong anti-evasion provision and specifying that the state agency should make copies of purchase opportunity notices it receives available to entities (such as non-profit groups) that list themselves as wanting to receive copies, so that they can offer their services to the residents.
- Create a program and funding mechanism to purchase the development rights of MHC’s.
  - Utilize existing programs to preserve farmland and open space as a model for preserving MHC’s by creating a state-funded program to buy the development rights of MHC’s.
  - This would enable family-owned mobile home parks to remain an affordable housing option without raising costs to MHC residents.
- Better enforcement of mobile home park registrations.
  - Since Tax and Finance assumed administration of the registration process for mobile home parks in 2020, the number of registered parks has declined from 1,800 to 1,200.
  - Either step up enforcement of registrations or reassign responsibilities back to Housing and Community Renewal, which previously administered the registration process until 2019.
- Help low- and moderate-income homeowners to replace dilapidated manufactured homes.
  - Increase funding for the Mobile and Manufactured Home Replacement Program administered by HCR from the current \$5 million to \$10 million.
  - Increase the amount allocated per home from \$100,000 to \$200,000.

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## Appendices

### Appendix A: MHCs by County

SARATOGA	105	JEFFERSON	27
DUTCHESS	88	ST LAWRENCE	27
ULSTER	83	RENSSELAER	26
OSWEGO	68	CHEMUNG	25
ONEIDA	63	SENECA	25
STEBEN	62	WARREN	24
ORANGE	56	GENESEE	22
CHAUTAUQUA	53	MADISON	20
BROOME	52	MONTGOMERY	20
ONTARIO	50	ONONDAGA	20
ERIE	48	MONROE	19
COLUMBIA	46	ROCKLAND	19
TOMPKINS	46	CORTLAND	17
WAYNE	44	GREENE	17
LIVINGSTON	41	WYOMING	17
SUFFOLK	40	ESSEX	16
TIOGA	37	WASHINGTON	15
CLINTON	36	FRANKLIN	14
CATTARAUGUS	35	ORLEANS	13
OTSEGO	35	SCHOHARIE	12
SULLIVAN	34	SCHUYLER	12
NIAGARA	33	NEW YORK	11
CHENANGO	32	PUTNAM	8
FULTON	31	LEWIS	7
ALBANY	30	YATES	5
DELAWARE	30	SCHENECTADY	4
CAYUGA	29	HAMILTON	3
ALLEGANY	28	WESTCHESTER	2
HERKIMER	28	RICHMOND	1
<b>TOTAL</b>			<b>1,811</b>

### Appendix B: Data Sources

- Historic Manufactured Home Park Registrations: 1989-2019
  - New York State Homes and Community Renewal's (HCR) Division of Housing and Community Renewal (DHCR)
  - <https://data.ny.gov/Economic-Development/Historic-Manufactured-Home-Park-Registrations-1989/sxi2-m23m>
- Mobile Home Parks: Last Inspection
  - Department of Health database: <https://health.data.ny.gov/Health/Mobile-Home-Parks-Last-Inspection/d3mj-xg62/data>
  - date of the last inspection and violations of Part 17 of the New York State Code of Rules and Regulations
- Manufactured Home Park Registrations: Beginning 2020
  - NYS Department of Taxation and Finance (DTF)
  - <https://data.ny.gov/Economic-Development/Historic-Manufactured-Home-Park-Registrations-1989/sxi2-m23m>

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