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DIGNITY TAKINGS AND “TRAILER TRASH”: THE CASE OF MOBILE HOME PARK MASS EVICTIONS

ESTHER SULLIVAN*

I. INTRODUCTION

A tenuous right to place is a lived reality for millions of low-income residents in America’s manufactured home communities, commonly called mobile home or “trailer” parks.¹ Mobile home parks have an ugly reputation in the United States: the home of seedy trailers and seedier “trailer trash” residents. They are often invisible, hidden behind tall walls and Walmart parking lots. Yet, mobile home parks matter immensely both for the poor and for the people who own and covet the land where parks are built. In fact, manufactured housing is the single largest source of unsubsidized affordable housing in the United States, with about 18 million people living in mobile homes and one third of these living within mobile home parks.² In mobile home parks, residents own their homes but rent the lots where the homes are located. The lack of legal right to the land under residents’ homes makes park properties ripe for redevelopment, as developers purchase these large tracts of land for other uses and legally evict entire communities with as little

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1. A note on terminology: The term “manufactured home” technically refers to an industrially-produced home fabricated after 1976 when the U.S. Department of Housing and Urban Development introduced manufactured home performance standards and the term “mobile home” refers to a home manufactured before 1976. In practice, however, the two terms are synonyms used to describe a prefabricated home of at least 320 square feet that is attached to a permanent chassis. Manufactured Home Construction and Safety Standards, 24 C.F.R. § 3280.2 (2017). This definition distinguishes mobile/manufactured homes from other forms of modular housing that are assembled on site. The term manufactured home is preferred by industry representatives and some housing advocates in attempts to increase the marketability of the homes or to downplay the notion that they are transient structures. Residents in this study were far more likely to use the problematic term “trailer,” though they also frequently used “mobile home.” I follow architectural historians in using the common term “mobile home,” not only because “manufactured home” was never used by a single resident participating in this study, but also because the term “conveys better than any other the basic hybrid character of the innovation and the essential basis for the conflicts it has engendered.” ALLAN D. WALLIS, *WHEEL ESTATE: THE RISE AND DECLINE OF MOBILE HOMES*, at viii (1991)*.

2. *Total Population in Occupied Housing Units by Tenure by Units in Structure*, U.S. CENSUS BUREAU, https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_B25033&prodType=table [<https://perma.cc/J9D9-66K3>].



as thirty days' notice in some states.³ These mass evictions occur with such frequency that U.S. housing advocates have warned the country is currently experiencing an "epidemic of [park] closures."⁴

This article examines this defining feature of contemporary life in mobile home parks: mass evictions that displace entire communities when parks are redeveloped. I analyze these mass evictions through the lens of dignity takings. Bernadette Atuahene's work provides a useful framework for thinking beyond the immediate practical and financial difficulties of eviction and forced relocation, to understand community dispossession in mobile home parks as an ongoing dignity taking.⁵ Drawing on in-depth ethnography conducted over two years living inside closing mobile home parks in Florida and Texas, I trace the legal and spatial forces that shape mobile home park residency, and provide an up-close window into the catalytic moments when mobile home residents are evicted en masse. In mobile home parks, dignity taking reproduces cultural understandings of mobile home residents as marginal and disposable and serves as a primary mechanism that structures their housing insecurity.

Understanding mobile home park housing insecurity through the lens of dignity takings is not only important to those living in mobile home parks, but to those interested more broadly in the experience of poverty and the security of affordable housing in the United States. Mobile homes are a primary way we house the nation's poor.⁶ Manufactured housing is not only the largest source of unsubsidized affordable housing but also the fastest-growing form of new housing in the United States.⁷ The last three decades have seen a steady increase in mobile home residency.⁸ Throughout the 1990s, manufactured housing represented two-thirds of the new affordable housing produced.⁹ The use of manufactured housing is concentrated among low-income Americans. Nationally, seventy-five percent of households living in

3. NAT'L CONSUMER LAW CTR., PROTECTING FUNDAMENTAL FREEDOMS IN COMMUNITIES 3–4 (2010).

4. NAT'L CONSUMER LAW CTR., PROMOTING RESIDENT OWNERSHIP OF COMMUNITIES 1 (2015).

5. See generally BERNADETTE ATUAHENE, WE WANT WHAT'S OURS: LEARNING FROM SOUTH AFRICA'S LAND RESTITUTION PROGRAM, at vii–viii (2014).

6. NAT'L CONSUMER LAW CTR., PROMOTING RESIDENT OWNERSHIP OF COMMUNITIES 1 (2017).

7. Paola Scommegna, *Study Finds U.S. Manufactured-Home Owners Face 'Quasi-Homelessness'*, POPULATION REFERENCE BUREAU (Oct. 2004), <http://www.prb.org/Publications/Articles/2004/StudyFindsUSManufacturedHomeOwnersFaceQuasiHomelessness.aspx> [<https://perma.cc/T8Y4-WQ5J>].

8. *General Industry Information*, MANUFACTURED HOUS. INST., <http://www.manufacturedhousing.org/research-and-data> [<https://perma.cc/KQX9-R6ML>].

9. NAT'L CONSUMER LAW CTR., *supra* note 6, at 1.

mobile homes earn less than \$50,000 a year, with a median annual household income of \$28,400 in 2013.¹⁰

For the large portion of mobile home residents living in mobile home parks, the threat of dispossession is literally inscribed into the land under their homes. About one-third of the nation's mobile homes are located in land-lease mobile home parks where residents own their home but rent their lot.¹¹ Indeed eighty percent of mobile home park residents own their homes but only fourteen percent own the land beneath them, effectively placing them "at the whim of property owners."¹² This unique form of land tenure, referred to as "divided asset ownership"¹³ is central in constructing both the housing affordability and housing insecurity that exists in mobile home parks. Without rights to the land under their homes, mobile home park residents are halfway homeowners.¹⁴ Their housing security depends on the decisions of private landlords. Ultimately, park residents, even those who have long owned their homes, can legally be evicted at any time when parks are sold or closed.¹⁵ This ethnography takes place inside mobile home parks before, during, and after residents were evicted and forced to relocate themselves and their homes.¹⁶ The parks described here, "Silver Sands" in Jupiter, Florida and "Trail's End" in Alvin, Texas,¹⁷ had been in operation since the 1950s and were home to stable communities of working class and poor home-owning residents who rented lots inside the parks for \$200-\$300 a month. This paper focuses on the experience of eviction from mobile home parks as a dignity taking and examines the immediate and longer term effects

10. *Income Characteristics: 2013 American Housing Survey*, U.S. CENSUS BUREAU, https://factfinder.census.gov/faces/tableserv-ices/jsf/pages/productview.xhtml?pid=AHS_2013_C09AO&prodType=table [<https://perma.cc/7NVT-Q89A>].

11. *Cost and Size Comparison for Manufactured and Site Built Homes: 2007–2015*, U.S. CENSUS BUREAU, <https://www2.census.gov/programs-surveys/mhs/tables/time-series/sitebuiltvsmh.xls> [<https://perma.cc/3NWX-AHZM>].

12. CONSUMERS UNION, *MANUFACTURED HOUSING RENTAL COMMUNITY TENANTS RIGHTS 1* (2001).

13. Werner Z. Hirsch & Anthony M. Rufolo, *The Regulation of Immobile Housing Assets Under Divided Ownership*, 19 INT'L REV. L. & ECON. 383, 383 (1999).

14. Esther Sullivan, *Halfway Homeowners: Eviction and Forced Relocation in a Florida Manufactured Home Park*, 39 LAW & SOC. INQUIRY 474, 474–97 (2014).

15. NAT'L CONSUMER LAW CTR., *supra* note 3, at 1.

16. All ethnographic and qualitative data, including direct quotes and field observations, were collected by the author over two years from May 2012 through May 2014. The study collected data from 180 people who lived or worked inside closing or potentially closing mobile home parks in Texas and Florida. In every park, in addition to written notes, I audio recorded all conversations and interactions relating to the relocation, which resulted in about 1,000 individual audio recordings and over 300 hours of MP3 files. I personally transcribed every hour of recordings and all interviews. Data and transcripts are available upon request.

17. The names of all parks and park residents are pseudonyms; the names of places are not.

of dispossession tied to dehumanization that structured these residents' experience of forced removal.

Constitutional takings occur when a state confiscates property against an owner's will and pays adequate compensation.¹⁸ Atuahene redefines the concept of takings to include various types of involuntary property loss across a broader spectrum of displacement and dispossession.¹⁹ To do so she coined the concept dignity takings, which refers to state actions that deprive persons of property while simultaneously depriving them of dignity in the form of dehumanization, infantilization, or community destruction.²⁰ Examining dignity takings in mobile home park properties requires not only an expanded conception of constitutional takings but also an expanded conception of the very definition of property.

The legal definition of property focuses on formal rights of ownership of land or chattel, in other words of real or personal property.²¹ For mobile home residents living in parks, the nature of "divided asset ownership" complicates this legal definition.²² Understanding the divided nature of residents' right to the property under their mobile homes is an important exercise in probing the role that the narrow legal definition of property plays in circumscribing understandings of property loss. Property scholars understand property as the bundle of rights to possess, use, exclude, and transfer property.²³ In the case of mobile home parks, residents' rights to use their homes are in tension with landlords' rights to transfer their properties. Landlords' rights of transfer allow them to dispossess their tenants of the lots under their homes and forcibly evict both them and their mobile homes from communities where many have lived for decades. This is the unique space of the mobile home park. As a place for owner-occupied housing, mobile home parks suggest permanence. As a space built on divided asset ownership, removal of residents is legal with the correct notice.²⁴ As a result, the mobile home park offers a perfect case to explore instances where the legal definition of property is disconnected from its social definition. It also offers an opportunity to better understand property loss in terms of the symbolic and social values property holds.

18. A. J. VAN DER WALT, *CONSTITUTIONAL PROPERTY CLAUSES: A COMPARATIVE ANALYSIS* 399 (1999).

19. ATUAHENE, *supra* note 5, at 3.

20. Bernadette Atuahene, *Takings as a Sociolegal Concept: An Interdisciplinary Examination of Involuntary Property Loss*, 12 ANN. REV. L. & SOC. SCI. 171, 179 (2016).

21. Thomas W. Merrill, *Property and the Right to Exclude*, 77 NEB. L. REV. 730, 750 (1998).

22. Hirsch & Rufolo, *supra* note 13, at 384–87.

23. Merrill, *supra* note 21, at 730.

24. *See generally* NAT'L CONSUMER LAW CTR., *supra* note 4, at 2.

Atuahene defines dignity takings as the actions by which “a state directly or indirectly destroys or confiscates property rights from owners or occupiers and the intentional or unintentional outcome is dehumanization or infantilization.”²⁵ Based on this definition, mobile home park mass evictions do not provide an example of dignity taking *par excellence*. Rather, the property and dignity lost during mobile home park displacements offer important extensions of the concept. The following sections explore how the case of eviction in mobile home parks expands the definition of dignity takings in three ways. First, it expands understandings of property beyond legal definitions to account for the practical experience of property ownership. Second, it expands understandings of property loss to account for the multiple values property can hold, which include not only economic but also social (emotional, symbolic, and collective) values. Finally, it expands the understanding of state actions to include not only the moment of taking itself, but also the regulatory actions that enshrine exclusionary and dehumanizing treatment into law. In the case of the mobile home I show how dignity takings are codified in zoning laws and financing regulations and explore how these forms of state action structure the secondary, dehumanizing social status of trailer trash.

II. THE ECONOMIC LOGIC AND PRACTICAL EXPERIENCE OF PROPERTY LOSS

In light of divided asset ownership, the challenge mobile homes pose to strictly legal definitions of property loss are twofold. First, mobile homes are not intended to be removed from property once installed. Removal can seriously degrade or completely destroy the structural integrity of the home (and thus any value or accrued housing equity).²⁶ Second, mobile homes are not seen as mobile by residents themselves, who experience their homes as permanent homes and their rental lots as part of the home. In this way, the legal definition of property ownership and the practical experience of property ownership diverge. This disconnect challenges ingrained understanding of involuntary property loss and can help to generate a fuller understanding of the value of property that extends beyond mere economic value.

The term *mobile home* is misleading. Contemporary mobile homes are highly *immobile*. Once set in place, their frames slacken and relocation can

25. Bernadette Atuahene, *Dignity Takings and Dignity Restoration: Creating a New Theoretical Framework for Understanding Involuntary Property Loss and the Remedies Required*, 41 LAW & SOC. INQUIRY 796, 817 (2016).

26. NAT'L CONSUMER LAW CTR., *supra* note 3, at 1.



result in serious structural damage.²⁷ Pervasive cultural understandings of mobile homes highlight their mobility, and actors interested in redeveloping mobile home parks into other land uses capitalize on these cultural understandings. However, the Manufactured Housing Institute, the industry's national trade organization, boasts that more than ninety percent of today's manufactured homes never move from their original site.²⁸ In truth, this estimate is misleading: when parks close, many homeowners are forced to abandon their homes. The cost of relocating a mobile home is prohibitive and can be more than the homeowner initially paid for the home. Estimates range from \$5,000 to \$10,000 with permitting and installation fees.²⁹ This cost represents a large share of both mobile home residents' average low incomes and their accrued housing equity, five to seven years' worth of accrued equity one study estimated.³⁰ While the mobile home industry is organized to depend on land-lease mobile home parks for the placement of the homes it prefabricates, the prefabrication of these homes is not designed to account for the insecure land tenure that is fundamental to land-lease arrangements. Mobile homes are not designed or constructed to move after they are transported from the factory and installed in parks. Yet the parks where they are installed are structured such that homes can be forcibly removed at any time.

This is further complicated because mobile homes become de facto tied to the land. Once put in place their structures slacken and degrade. In many cases they *cannot* be removed from the property and remain livable. Thus removal of the home effectively destroys the home and the homeowners accrued housing equity. In other words, eviction from a property that *does not* legally belong to a resident destroys property that *does*. Like many of her neighbors, eighty-seven-year-old evicted Florida resident Stella, learned she would lose her home of twenty years because it was not structurally sound for relocation. Stella cut to the heart of divided asset ownership when she stressed: "I paid for it [the home]. I did all the repairs. The only thing it's sitting on is the landlord's dirt."

Stella's perception of her home exposes a fundamental difference between her understanding of formal definitions of property rights and her practical experience of property rights. For Stella and many other mobile home residents, her understanding of home extended beyond the four walls

27. KEVIN JEWELL, CONSUMERS UNION, MANUFACTURED HOMEOWNERS WHO RENT LOTS LACK SECURITY OF BASIC TENANTS RIGHTS 1 (2001).

28. *Frequently Asked Questions*, MANUFACTURED HOUS. INST., <http://www.manufacturedhousing.org/faqs> [<https://perma.cc/7YA9-STPS>].

29. NAT'L CONSUMER LAW CTR., *supra* note 4, at 9.

30. *See id.*

of her trailer to the property of the lot itself. Residents' practical understanding of property was evident in the care they took in the land around their homes, where the "landlord's dirt" was a site of investment and cultivation.

While cultural understandings of mobile homes highlight their mobility, residents of mobile homes stress their permanence. Homeowners planted these grounds, cultivated gardens on them, and expanded their homes through built on decks, screened porches, additional bedrooms, and utility rooms. In the Florida mobile home I rented after its owners abandoned it in the face of their looming eviction, one of the rooms I utilized most was a built-on wood-working shop. The former owner had evidently done the same; the room was pristine and organized, but well used. It was the origin of many other additions and enhancements the homeowner had done inside the home. Like other extra rooms, porches, and additions that augmented the majority of homes in both Florida and Texas parks, this addition was made by the home's former owner with the knowledge and approval of the landlord and with the expectation of enhancing future livability and home equity.

These additions and improvements, made outside the home on property that did not belong to residents, were nonetheless experienced as part of the home. During her eviction, Tabitha had difficulty distinguishing between her home and improvements made on her rented lot, even after she was informed by a mobile home relocation company that her porch addition was not part of her home and would not be relocated with the home:

So they are like, can't you just live without a porch? And I'm like, if you bought a three-bedroom house and then was told that you could only have two of the bedrooms, what would you think? How would you feel? He said, how often did you sit out there? I said, that's not the point, it was part of my house! I bought that place—that was one of the reasons that I bought that place, because I liked the house and I liked the porch. And I liked the location. Not that it was mine, but I felt it was part of the house. I thought it was part of the house. I felt it was part of the house. As if it was attached to the house.

Even in the final days of their eviction, residents continued to maintain their lots as if they were part of the home. Indeed, even residents who were forced to abandon their homes because they could not be relocated took pride in the home as they abandoned it. Only two days before he abandoned his home of five years and began three years of sleeping on the street, Randall was busy replacing one of the jalousie window panes that had been lost on his front door window. Humiliated, he knew that the home would likely be dismantled for scrap metal but he insisted on this small repair because he wanted the home to look "decent." Similarly, when Betty turned over her

home to the developer that had purchased Silver Sands to build luxury apartments, she noted: "Gosh it was spotless." She even waxed her floors and washed her curtains. She abandoned the pristine home on its lot surrounded by the rows of lilies she had planted over the last two decades on grounds that did not legally belong to her.

During park closures, the residents, landlords, and park redevelopers involved in this study all articulated a clear understanding that the land under residents' homes was owned by the park. However, in practice these residents cultivated, depended on, and imagined these lots as their own. The practical experience of their home and community was based on an expectation of stability and permanence. Elderly residents in this study (a group disproportionately represented in mobile home parks) often expressed the expectation that they would never again move in their lifetime, despite the formal understanding that they did not have rights to the land under their home. Richard, an elderly evicted Florida resident, said, "I thought that this would probably be my last home. I thought that I would probably die in this unit. ('So when did you realize that you might have to move?') When the notice came through telling me that I have six months to get the hell out of here." Similarly, Ron, a seventy-year-old Florida resident, said, "I've lived here most of my life and now I have cancer and I'm going to die. I have 2 to 5 years, I thought I was going to die here." Ron was evicted before he died of cancer.

Scrutinizing the disconnect between residents' expectation of permanence and their formal lack of property rights helps us to understand the multiple values property can hold. For Atuahene, "a robust understanding of property's multiple values is required to fully comprehend the magnitude of loss associated with takings."³¹ From a sociological standpoint, this understanding emerges from a nuanced distinction between the use value and exchange value of place.³² Mobile home parks contain exchange value for landlords and property developers who have a vested interest in highlighting homeowners' lack of legal claim to the property under their homes, but they also contain use value for residents whose everyday practical experience of home includes the land underneath them. This practical perception of property is demonstrated not only in words but in deeds, as residents not only refer to their rented lot as their home but also expand and augment their homes within the confines of their lots, building and improving upon the land (with the landlord's consent). This practical claim to property is expressed

31. Atuahene, *supra* note 20, at 171.

32. JOHN R. LOGAN & HARVEY L. MOLOTCH, *URBAN FORTUNES: THE POLITICAL ECONOMY OF PLACE* (1987).

symbolically in the perimeters of shrubbery and landscaping that designate their lots. It is expressed emotionally in residents' talk of their park as a forever home. When scholars follow residents in viewing home this way they rescue the concept of property from being reduced to only its economic value and highlight the importance of its manifold emotional, symbolic, and social values.³³

III. CONSTRUCTING TRAILER TRASH

If we proceed from the understanding that mobile home park residents are deprived of property—both legally, as some lose their homes and accrued equity when mobile homes are not structurally sound for removal and symbolically, as they are dispossessed of properties they cared for and counted on with an expectation of permanence—we can begin to understand the dehumanizing processes that constitute their eviction as a dignity taking. Atuahene argues for a two-prong approach when examining whether the dehumanization or infantilization on which a dignity taking is based occurred: 1) examining the intentions of parties responsible for the involuntary property loss and 2) examining the intended and unintended consequences for the dispossessed.³⁴

In the case of mobile home parks, no clear strategy of dehumanization has been created to intentionally deprive mobile home residents of both property and dignity. Nonetheless, states and localities have adopted exclusionary treatment of mobile home parks that is codified in the form of municipal ordinances and financing regulations.³⁵ The discriminatory zoning and financing of mobile homes act, to paraphrase Pierre Bourdieu, as a *strategy* without a *strategist*.³⁶ In other words, with marked consistency these regulations position the mobile home park as a marginalized and substandard community form. Stigmatizing perceptions of the community form affects all members of the mobile home park and contributes to broader cultural perceptions of mobile home residents as marginal, mobile, and expendable.

The consequence for residents is a clear understanding of: a) their degradation from full citizenship, b) their perceived role as expendable detritus, and c) the disposability of their communities in the interest of redevelopment. These processes intersect to produce a marginalized class of residents

33. Atuahene, *supra* note 20, at 172.

34. Atuahene, *supra* note 25, at 811–12.

35. For a fuller examination of regulatory barriers to manufactured housing see CASEY J. DAWKINS ET AL., U.S. DEP'T OF HOUS. & URBAN DEV., REGULATORY BARRIERS TO MANUFACTURED HOUSING PLACEMENT IN URBAN COMMUNITIES (2011).

36. PIERRE BOURDIEU & LOÏC J. D. WACQUANT, AN INVITATION TO REFLEXIVE SOCIOLOGY (1992).

who lack full autonomy and rights. The process by which trailer trash is constructed—especially through the zoning and financing of mobile homes—not only *produces* residents' lack of right to their communities but also *reproduces* their social stigma as trailer trash. Degraded to trash, and swept away in the cleansing of urban revitalization, these residents are dehumanized and deemed disposable. These intersecting processes—those codified in zoning, practiced in financing, and reproduced in the designation of trailer trash—reveal the interplay of objective policies and subjective perceptions in the operation of dignity takings.

A. Zoning

The legacy of mobile home zoning and finance has been integral in constructing the marginality of the mobile home park. Municipal regulations have historically been used to prohibit, divide, and isolate parks from surrounding communities and the effects of this are still felt today. Alongside marked growth in manufactured housing that began in the post-WWII era, was a marked increase in ordinances, resolutions, covenants, statues, and municipal regulations that restricted the placement of mobile homes and the development of mobile home parks.³⁷ From 1966 to 1969, production of mobile homes nearly doubled and one out of every two new single-family homes constructed in the United States was a mobile home, leading the author of a 1973 law review of mobile home park regulation to state, “[f]or a while it has become apparent that a large number of persons are willing to live in house trailers, it has become equally obvious that many people are unwilling to live near mobile homes, especially when they are concentrated in trailer parks.”³⁸ Over the ensuing decades, as manufactured housing has continued to grow, zoning laws have been utilized as a solution.

In the 1970s, a majority of states authorized local municipalities and townships to regulate mobile homes within their jurisdictions; this set the stage for the regulatory treatment of mobile home parks for decades to follow.³⁹ Judicial decisions challenging these ordinances illustrate ingrained cultural perceptions of mobile home residents and had the effect of further institutionalizing their treatment as a secondary and subordinate class of citizens. An Alaska case considering a private covenant to exclude mobile homes from a subdivision of conventional homes was upheld on the basis that using the land for a mobile home park would violate a covenant against

37. MARGARET DRURY, *MOBILE HOMES: THE UNRECOGNIZED REVOLUTION IN AMERICAN HOUSING* (Praeger Publishers rev. ed. 1972) (1967).

38. Marvin M. Moore, *The Mobile Home and The Law*, 6 AKRON L. REV. 1, 2 (1973).

39. *Id.* at 1.

"noxious or offensive trade or business."⁴⁰ A Colorado case called the domesticity of mobile homes into questions, ruling that a private covenant could legally bar them because it held that land "will be used for dwelling houses only."⁴¹ In Iowa, the court in *Jones v. Berber* stated that no "garage, trailer, shack or hut shall be used for living purposes."⁴² In *McBride v. Behrman*, the court upheld a covenant that banned trailers based on language that prohibited "temporary dwellings" and "unsightly structures" and counterpoised them with the attractiveness and relative affluence of the existing community.⁴³ The court noted,

In general, the court rulings of this period had the effect of defining the trailer as a temporary and mobile residence. Someone moving from place to place in a trailer was treated as a transient The ambiguity of these rulings reflects legal traditions that assume that proper dwellings are *attached* to land.⁴⁴

In the absence of a national ruling on exclusionary zoning of mobile homes, an array of approaches enacted by state and local governments has created a patchwork of restrictions and regulations that severely limit the location of mobile home parks in practice. A 1980 national survey of zoning practices found the municipal techniques most commonly used to restrict the placement of mobile homes are: complete exclusion of manufactured housing, restriction of mobile homes to mobile home parks, and exclusion of mobile homes from residential areas.⁴⁵

Today, jurisdictions continue to restrict and direct the development of mobile home parks through a variety of planning and regulatory tools.⁴⁶ Historic zoning processes that relegated mobile home parks to undesirable non-residential areas have resulted in contemporary spatial arrangements in which parks remain "mislocated" in commercial and industrial districts.⁴⁷ A recent national study of metropolitan plans and regulations found that many

40. *Hallet v. Sumpster*, 106 F. Supp. 996, 999 (D. Alaska 1952).

41. *Pagel v. Gisi*, 286 P.2d 636, 636 (Colo. 1955).

42. 103 N.W.2d 364, 365 (Iowa 1960).

43. 272 N.E.2d 181, 188 (Ohio Ct. Com. Pl. 1971).

44. WALLIS, *supra* note 1, at 74*.

45. See ARTHUR D. BERNHARDT, *BUILDING TOMORROW: THE MOBILE/MANUFACTURED HOUSING INDUSTRY* (1980).

46. See generally ROLF PENDALL ET AL., BROOKINGS INST., *FROM TRADITIONAL TO REFORMED: A REVIEW OF THE LAND USE REGULATIONS IN THE NATION'S 50 LARGEST METROPOLITAN AREAS* (2007), https://www.brookings.edu/wp-content/uploads/2016/06/20060802_Pendall.pdf [<https://perma.cc/4ABE-P6E4>]; Casey J. Dawkins & C. Theodore Koebel, *Overcoming Barriers to Placing Manufactured Housing in Metropolitan Communities*, 76 J. AM. PLAN. ASS'N 73 (2009).

47. WELFORD SANDERS, AM. PLAN. ASS'N, PAS 398, *REGULATING MANUFACTURED HOUSING* 4 (1986).

jurisdictions had adopted restrictive or exclusionary regulations to discourage or prohibit the use of mobile homes.⁴⁸ These processes restrict mobile home park residents from residential areas (the places where people live), and relegate them to industrial and commercial zones (the places where things are produced and exchanged).

B. Financing

While historic exclusionary zoning has continued to locate mobile home parks on inferior non-residential land, an equally damaging form of regulation has come from the treatment of manufactured homeownership as an inchoate or halfway mode of homeownership by 1) the Federal Housing Administration (FHA), which has refused to insure mortgages for mobile homes located in parks and 2) financing institutions that finance mobile homes as personal property.

The discriminatory financing of mobile homes stems from their origins as 1920s travel trailers and WWII-era temporary wartime housing. Since the 1970s, manufacturers have almost exclusively designed mobile homes as permanent residences and increasingly large, complex, and immobile models are a product of the industry's and residents' expectation of permanence. Nonetheless, the mark of impermanence has continued to plague the mobile home to the present day and has barred mobile home park residents from mainstream housing finance and the protections that come with it: "The foundation of government support and subsidy for housing has been based on 'permanence.' Because of this commitment to permanence, and since the mobile home is considered a temporary unit, the government, for all practical purposes, disengaged itself from support of the mobile home unit."⁴⁹

Tellingly, as early as 1956, the FHA developed a program for insuring park lands under Section 207 of the Housing Act.⁵⁰ It thereby protected park owners' investments in their private property while leveraging the same property to exclude park residents from the full legal status of homeowner, refusing to insure loans on mobile homes.⁵¹ Later, the 1961 Housing Act provided park developers loans of \$1800 per lot for park development.⁵² The

48. See Dawkins & Koebel, *supra* note 46, at 74.

49. DRURY, *supra* note 37, at 131.

50. See *Mortgage Insurance for Manufactured Home Parks: Section 207*, U.S. DEP'T OF HOUS. & URB. DEV., https://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/progdsc/homepark207 [https://perma.cc/QPX5-2JUD].

51. DRURY, *supra* note 37, at 131.

52. *Id.*

mobile homes located on these lots continue to be ineligible for such protection or support.

Due to restricted access to traditional mortgages, the vast majority of mobile homes are financed as private property through chattel loans which resemble automobile financing.⁵³ These loans have shorter terms, higher interest rates, higher default rates, and fewer consumer protections than traditional mortgages.⁵⁴ The classification as private property means mobile homes are more vulnerable to predatory lending practices and that they depreciate each year like a car rather than appreciating like a site-built home.⁵⁵ The negative impacts to the housing stability and wealth creation of low-income households are immense. As housing scholars have argued:

We need to promote and codify an understanding that manufactured housing is not mobile, not chattel, not disposable, and not a special case Every housing advocate knows the gospel about homeownership If we believe it, we should ask ourselves why it is acceptable to overlook millions of owner-occupied, depreciating homes that are cut off from the rest of the housing stock in a parallel legal universe.⁵⁶

As in the case of municipal zoning ordinances, these lending classifications have implications far beyond the financial, for all mobile home residents, whether they own or rent, whether then live in parks or on private land. The legal classification of mobile homes in parks as chattel, from the Latin word for "head" meaning the head of cattle, is based on its legal distinction from "real" property. This classification detaches a primary source of low-income housing from the powerful associations related to home, hearth, and community. It dichotomizes real homes and mobile homes, stable communities and trailer parks, the local people and the trailer trash. The way we regulate translates into the way we perceive. The cultural effigy of the trailer park and the trailer trash living there is in part constructed through regulation, which in turn ensures a separate, secondary, and dehumanized social status for mobile home residents.

53. See NAT'L COMM'N ON MANUFACTURED HOUS., FINAL REPORT 70 (1994).

54. CONSUMER FIN. PROT. BUREAU, MANUFACTURED-HOUSING CONSUMER FINANCE IN THE UNITED STATES 24 (2014), http://files.consumerfinance.gov/f/201409_cfpb_report_manufactured-housing.pdf [<https://perma.cc/A5RW-UBL3>].

55. See Lance George, *Manufactured Housing*, in NAT'L LOW INCOME HOUS. COAL., 2016 ADVOCATES GUIDE 6-9, 6-10 to 6-12 (2016).

56. Richard Genz, *Why Advocates Need to Rethink Manufactured Housing*, 12 HOUS. POL'Y DEBATE 393, 408-09 (2001).

C. Trailer Trash

The dehumanization of mobile home residents as trailer trash occurs from both the top down and the bottom up. From the top down, it occurs in the official city council meetings where the closures of parks are reviewed. In these meetings, residents encounter dominant tropes of their communities in the language and actions of city officials who embody (and publicly sanction) public perceptions and priorities.

In Jupiter, Florida, where Silver Sands was being redeveloped as a mixed-use luxury apartment and medical office space property, the developer needed to appear before the city council to request a rezoning change on the property from “mobile home park” into “mixed-use development.” By the time of the city council meeting in August of 2012, residents had been waiting months for the public hearing in the expressed hope that the council might acknowledge their concerns and deny the rezoning application.

Residents who came to speak during the public hearing first sat through the developer’s PowerPoint presentation, which was given to a receptive council. In the presentation, Silver Sands, a community of 130 households, some of which spanned generations of the same family and some of which had lived in the park for several decades, was reduced to the single phrase “130 mobile home sites.” No picture of Silver Sands was shown. Instead, the developer showed several full color slides depicting beautifully rendered design images of the property that would replace their community. Silver Sands resident Richard expressed how he felt seeing these images and the city council’s positive reaction to the development which would replace his home of ten years:

[The developer] is showing everybody pictures of what it’s going to look like. Who the hell cares? They’re going to kick you out what difference does it make what it’s going to look like?! Here’s the beautiful place you can’t live in.

In the end, after months of waiting and hoping the city council would not approve the rezoning of their community, the council not only approved the rezoning change but also expressed satisfaction that the redevelopment of Silver Sands into middle-class “workforce housing” would be beneficial for the city. The Mayor asks the council if they are satisfied from both the verbal and written presentation. All of the members of council agree they are satisfied. There is very little discussion on this point. The Mayor announces that they have consensus within one minute. Next, they vote on the future land-use change from residential to commercial. The Mayor says: “Overall the opportunity to have additional workforce housing is very important to us.

That is a great location for the reasons that we heard. So I think that it's going to be quite good!" The city council votes unanimously in favor of the zoning change and eviction of all Silver Sands residents.

In Alvin, Texas, similar perceptions of mobile home park residents were expressed by the local city council who had instituted a new mobile home park ordinance that required all of the city's decades-old mobile home parks make costly upgrades to be "up to code" or else close down. The city council held several meetings where landlords requested variances to the code, citing prohibitive costs and pleading that they would be forced to evict residents as a result. The attorney for the city herself lamented that some of the requirements of the new ordinance (for example, the requirement that all parks be enclosed with an eight-foot fence) were not only prohibitively costly for the town's "mom and pop" landlords but also that they were not meant to improve health and safety in the parks. Instead they were designed to visually remove the sight of parks from non-mobile home residents of the town: "Some of them [the code requirements] are not helping safety; some are aesthetic." The city attorney further explained:

I think what happened was that some people got on city council and they said: the place is all trashed, the city is trashed, there's trailers everywhere . . . you could say, I own a nice house next to a trailer park, this is an example, if it is shut down my property will have better property value than if it is not.

In Trails' End, as in Silver Sands, the city council process reduced residents to their material homes. The Alvin city council debated over how many homes could be left behind for the property to no longer be considered a mobile home park. They decided on the arbitrary number of three homes, meaning three structures. Because of this arbitrary distinction, generations of families living in Alvin parks were split up. In their efforts to get up to code, landlords made determinations about which three households could stay based on the quality and appearance of the homes, not the characteristics or needs of the people within the homes. In Trail's End, Lupe and her husband as well as her mother and father were able to stay in their park and in their homes, along with one other household who lived in a newer model mobile home. Lupe's sister, Ana, was evicted from Trail's End and forced to move her older, more dilapidated mobile home to a park outside of town in the county jurisdiction. She said the hardest part of the move was being cut off from her family.

In both states, these city council processes both revealed and officially sanctioned the secondary status of mobile home park residents. Silver Sand's

resident Kathleen had spoken during public comment to her local city council. She hoped that expressing her love for her home of ten years and detailing the difficulty of moving herself (confined to a wheelchair after the amputation of her leg at the hip) and her disabled husband might influence the council's decision. After attending the city council meeting, Kathleen discussed the process with her husband Chip:

Kathleen: It's too late. It's a done deal.

Chip: What I was hoping for was that the Town of Jupiter would make it tough for them. But the Town of Jupiter—and Palm Beach County—doesn't want trailer parks. You can tell that. Since we lived here, how many trailer parks have closed up? Three?

Chip names the three trailer parks that have closed in this area. Kathleen says softly that the reason that people don't like mobile home parks is because they've never been inside a mobile home. They just see them on the outside and they think the people that live in them are trailer trash. Kathleen points out: "It's sad but the community wants us out of here. They just don't want a trailer park." Kathleen tells Chip that what is so sad to her is the way that "the community has not backed us up," pointing out that many people in Silver Sands give to local charities or belong to churches and none of these organizations have made any attempts to help the residents of the park. In her perception the local council and the broader community have remained silent in the face of their removal. Kathleen says: "This is what really bothers me."

The process of dehumanization occurs from the top down in the official language of city councils that reduce park residents to their physical homes, and then deem these homes undesirable, unsightly, and disposable. In doing so they not only dehumanize mobile home residents but they remove the ethical dilemma of evicting poor, elderly, or otherwise vulnerable people. This process of dehumanization also occurs from the ground up, as residents recognize their secondary status, identify themselves as trailer trash, and feel a diminished sense of autonomy and power.

Mattie points out that she was not really surprised when she received the notice that her city was considering rezoning Silver Sands and evicting over one hundred of her neighbors. She explains that she was also not surprised by the city council's evident desire to replace her mobile home park with more "acceptable" forms of housing:

We've been living here 20 years and when we came here that was just a two lane road out here. And as they kept building, we figured, the land was good. It's property that people naturally want to build on. And as we know they don't want trailers, campgrounds, whatever you want to call them, mobile homes. They don't want them in the town. Now this is an upscale town.

....

I think that they think that the people that live in mobile homes are not wealthy enough or do not have enough money for enough income or a good enough job to be average citizens. I think that's why this company [the development company] can mess over so many people. They think that they don't have any rights or that they can't protest for what they want. That kind of stuff.

....

It's scary when you stop and think about it. When you have been settled and you own your own home and you think everything is going nice and smooth and everything, then all the sudden somebody says: Get out. Well, how am I going? Where am I going to? What's it gonna cost me? Will I like the place I'm going to? One question after another. And you can't find out! That's the way it is. [Sighs.] Yeah.

Mattie articulates the confusion and powerlessness she faced as her park began to close. She also articulates a sense of disposability, loss of autonomy, and lack of full personhood that she associates with being a mobile home park resident. This sense of disposability and powerless was driven home by the physical relocation of her home.

As a researcher, I had anticipated that the moment of receiving the eviction notice and the process of speaking at city council would be most salient for residents. I did not anticipate the primacy that the physical move of the home would have. Through the lens of dignity takings, however, there are clear parallels between park residents witnessing their homes being hauled away on the back of a semi-truck and Soweto residents witnessing of the bulldozing of their former homes.⁵⁷ In these moments the full impact to residents' indignation was laid bare. Park residents told me repeatedly that the experience of seeing their home being "pulled down the road" was unnerving, demeaning, and painful.

We've been standing outside Walter's home for the better part of the day, waiting as it is hitched to the truck. Walter's daughter-in-law, Gail (who lives down the street in her own mobile home) has come to join us. Finally, around 3:00 p.m. Walter's home starts to move. It comes towards us trailing behind the large semi-truck. We are all silent as the truck, the house, and then the escort car drives by with lights flashing and a wide load banner hung across its back. As the home turns the corner down the main road that leads out of Silver Sands, we silently pile into Gail's minivan, pulling behind the caravan. We go about thirty miles per hour as we drive behind the trailer the whole way. Gail whispers as she concentrates on driving: "Surreal." Though

57. ATUAHENE, *supra* note 5, at 38–42.



both Gail's and Walter's households have been packing and disassembling their homes for months, including serious physical labor like removing the large screened-in porch additions that ran the length of both their singlewides, Walter mentions for the first time how exhausted he feels. He's surprised by the toll this day has taken on him: "I'm all worn out and I ain't done nothing." Gail states: "That's when Matthew and I started noticing that we were actually tired, was the day our trailer actually got moved."

Tabitha summarized this experience more tersely, explaining: "This whole thing is not settling. Watching your home be pulled down the street, crooked." These residents' visceral response to seeing their homes being hauled away speaks to the deep "unsettling" produced by the visible sight of their home torn from its foundation, by the material expression of their own disposability. That this became the most salient feature of the eviction for some residents demonstrates that beyond the practical and financial costs of eviction, the loss of dignity was a primary cost.

Traffic flowed freely by Walter's home as he followed behind it with Gail in the minivan, and she whispered: "Surreal." Local charities and churches remained silent in the face of their own members' eviction and Kathleen mused: "The community has not backed us up That's what really bothers me." Sammy summarized the treatment of his family and neighbors by the developer, the landlord, and the local city officials by stating blankly: "We're trailer trash to them."

Trash. The word encapsulates the disposability of mobile home park residents and the communities they call home. It also encapsulates a broader process by which urban redevelopment privileges some residents (and their claim to place) while dehumanizing and dispossessing others. The very process of urban redevelopment and revitalization is a process of taking out the trash, what sociologist Loïc Wacquant calls "the cleansing of the built environment and the streets from the physical and human detritus wrought by economic deregulation and welfare retrenchment."⁵⁸ Within this framework the mass evictions that occur when mobile home parks are redeveloped must be understood as a community-wide exercise in dignity taking.

IV. REAL LOSS AND SYMBOLIC HURT

The possibility of dignity restoration for mobile home park residents requires more than simple compensation for what residents have lost. Tellingly, in both Texas and Florida, residents expressed a similar loss of dignity,

58. Loïc Wacquant, *Relocating Gentrification: The Working Class, Science, and the State in Recent Urban Research*, 32 INT'L J. URB. & REGIONAL RES. 198, 199 (2008).



a similar sense of being demoted to "trash," even though state statutes in Florida require monetary compensation for relocation paid to residents to defray the cost of their move. The Florida statutes have organized a permanent trust fund through which evicted mobile home park residents receive payment in the form of a voucher (to be redeemed by a licensed mobile home mover) in the amount of \$3000 for a singlewide mobile home and \$6000 for a doublewide mobile home.⁵⁹ In Texas, state statutes do not mandate any form of compensation or assistance for residents when their parks are closed and they are evicted.⁶⁰

Despite this difference in legally mandated financial compensation, residents in both states experienced their eviction through a similar emotional framework. In its most raw form, the emotional impact of the evictions was expressed as a deep sense of sadness and hurt. Trail's End resident, Eunice summarized the experience: "On learning the news I was surprised, I didn't expect it," Eunice says. She has lived in the park for seven years. She remembers that when she first heard the news she felt "a lot of sadness." She recalls that her children and her husband were all feeling the same way, sad mainly. Eunice's neighbor tells Eunice that when she learned that her park would close: "Duele, se Duele." She felt simply hurt, it hurt.

Rachel, a young resident of Trail's End, was overcome by this hurt in the days immediately after her family of six was evicted. Overwhelmed, Rachel explained: "I think that this is why there is a lot of suicide. I think this is why people do suicide, because right now you are just depressed . . . You want to kill yourself. I mean, it hurts. Oh. I'm gonna cry. It hurts."

Silver Sands resident Lois had a more bodily experience of this hurt. During the eviction process she began taking five milligrams of Oxycodone in both the morning and evening. This troubled her, since regulating her use of the drug had long been important to her. She used to attend a pain management clinic, but she cut her ties with the clinic when she felt the doctor was pressuring her to increase her dose. Yet, during the eviction she began increasing her own dose because she felt constant pain. She explained: "But *with all this*, the pain is back in my stomach. I am taking two pills in the morning and two at night. Now I took the pill an hour and a half ago and my stomach *still hurts*. So you can imagine how much it hurt before I took it." Silver Sands resident Paula also turned to substances to dull the pain she felt, so much so that she ran out of the pain pills she was prescribed for a back injury. She said, "I've been a basket case." Though she had never been a big

59. See FLA. STAT. ANN. § 723.0612 (West 2017).

60. See TEX. PROP. CODE ANN. §§ 94.201–206 (West 2017).

drinker, without her pain medication she had been taking Aleve or Motrin and drinking a beer or two at night to “at least try and function.”

During the eviction (and due in part to Florida’s system of providing voucherized relocation assistance) Silver Sands resident Walter encountered outsiders’ views of himself and his community. After one recent interaction, Walter used his characteristic dark humor to express the hurt of encountering demeaning perceptions of mobile home residents. Walter notes:

And I was feeling so good! Here I am, I thought I was looking so good. I put on a clean shirt every three or four days, change my socks once in a while and shower here and there. I can drive a car and all that stuff. And I thought damn, I’m pretty high up. Come to find out I ain’t nothing. It is funny yeah, but it’s also kind of serious too—not that people say all that stuff about how I should know my level, but it’s just kind of sorry that people think that way. That’s the thing that hurts.

The experience of hurt, a sense of indignity in one of its rawest forms, was shared by residents across Texas and Florida, in contexts where they received state compensation or where they did not. Their common emotional experience of eviction speaks to a more fundamental dignity taking that occurred over and above their loss of community. This common experience may seem counterintuitive through the lens of property rights and the economic value of property. Through that lens residents might be expected to be up in arms, feeling a sense of injustice, fighting for their rights. However, through the lens of dignity takings, the layers of sadness, humiliation, and hurt they felt overshadowed these other emotions. In short, the sense of indignity became most salient and may have even acted to dampen their political activism.

V. CONCLUSIONS—SOCIAL PROPERTY AND COLLECTIVE DIGNITY RESTITUTION

The insights from inside closing mobile home parks contribute to our understanding of dignity takings in important ways. They broaden the very concept of property, and point to the need to examine the practical, emotional, and symbolic experience of property loss when evaluating dignity takings. They also highlight that this experience of loss not only produces static emotional states—anger, sadness, indignity—but also produces hurt and harmed subjectivities that may preclude further political action among the dispossessed.



Struggles over property are both material and representational, as urban residents' battles over gentrification in their neighborhoods show.⁶¹ As Atuahene's South African case also demonstrated, even in cases where residents did not legally own land due to apartheid they were nonetheless subject to dignity takings when evicted from long-time neighborhoods.⁶² The feelings of hurt expressed by residents in both Texas and Florida highlight the limits of strictly legal dimensions of property rights and point to a need to better understand social definitions of property.

According to geographer Nicholas Blomley, the meaning of property has long appeared to be settled by legal definitions that highlight rights of ownership and exclusion: "Property is imagined here as private property, with the solitary owner exercising exclusionary rights over a bounded space. While property may be public (that is, held by the state), it is rarely imagined as collective It encourages a view of property as nonsocial; that is, as concerned with relations between people and things, thus obscuring property's effect on social relations of power."⁶³ Indeed this hegemonic understanding of property excludes social definitions of property, like those generated from the ground up by residents' practical experience of their homes and communities. This is important not simply to social scientists examining the social implications of property loss, but to legal scholars interested in foundational understanding of property. After all, legal theory has long sought to distinguish property from "thing-ownership,"⁶⁴ stating "property is not things, but rights, rights in or to things."⁶⁵ Returning to foundational legal understandings of property as rights necessitates addressing residents' collective rights to the places they call home.

Yet, social definitions of property cannot include everything. Arguing that social property is everything risks reducing the concept to nothing. The case of mobile home park dispossessions highlights key elements that shape the practical experience of property. These elements of social property include: 1) temporality, 2) sweat equity, and 3) identity.

In the mobile home park, the temporality of residents' land tenure shaped their practical experience of their community as their own. This is not to say that only long-term residents had property rights in Trail's End

61. See, e.g., Nicholas Blomley, *Landscapes of Property*, 32 LAW & SOC'Y REV. 567, 568 (1998).

62. ATUAHENE, *supra* note 5, at 30.

63. NICHOLAS BLOMLEY, UNSETTLING THE CITY: URBAN LAND AND THE POLITICS OF PROPERTY, at xiv-xv (2004).

64. Blomley, *supra* note 61, at 572.

65. PROPERTY: MAINSTREAM AND CRITICAL POSITIONS 2 (C. B. MacPherson ed., 1978).



and Silver Sands. The expectations and experiences of even shorter term residents were shaped by neighbors who had lived in the parks for decades, some since the parks first opened in the 1950s. The vector of temporality goes both ways, the long-term residency of many park residents shaped the future expectations of those like Richard and Ron, who said, "I thought I was going to die here."

Over time, residents invested in property, and their sweat equity transformed their practical experience of home. Though they acknowledged their lots were not legally theirs, the very practice of extending their homes through porches, extra rooms and additions transformed their understanding of the land under their homes and led residents to argue, like Tabitha did: "Not that it [the land] was mine, but I felt it was part of the house. I thought it was part of the house. I felt it was part of the house."

Finally, in the mobile home park property loss is collective. While the threat to property is facilitated by a collective social identity, trailer trash, the claim to property comes from resisting this collective identity through a self-conscious pride in their communities. This pride also affected residents' ability to resettle in new parks. Though their homes were transported, residents described a deep-felt loss of community and social ties. As Kathleen explained in her new park: "I'm not happy . . . I don't know anybody. Down there everybody knew everybody." As Larry lamented after leaving, "Everything was just so beautiful there, so great . . . It's not going to be the same. No matter where you go, it's not going to be the same."

This points to a process fundamental to dignity restoration. When dignity takings result in community destruction, dignity restoration must occur at the community scale. When dehumanization or infantilization targets a collective identity, as in the social construction of trailer trash, dignity restoration must occur at the collective scale. Doing so in the case of evicted mobile home park residents requires envisioning alternative definitions of property, name collective or social property. It also requires imagining alternative community forms, including collective ownership through alternative land holdings such as cooperative parks, community land trusts, or public ownership.

Indeed, the primary national non-profit working to address mobile home park mass evictions, ROC (Resident Owned Communities) USA, does so by working with residents to submit competing purchase offers for rede-

veloping parks and converting parks to collective ownership, thus guaranteeing lands cannot be sold out from under residents.⁶⁶ The legal work of non-profits like ROC USA to create resident-owned communities transforms the social property of parks into legitimized communal property.

What is important about this work is not only that it offers one solution to the halfway homeownership found in parks, but that it also reveals how process is key in dignity restoration. Recall that in the Florida case residents did receive some financial compensation but monetary reparations did not mitigate the hurt and harm they felt. Because dignity restoration incorporates principles of redistributive justice, it "seeks to rehabilitate the dispossessed and reintegrate them into the fabric of society to through an emphasis on process."⁶⁷ Residents of parks converted to resident ownership describe how the very process of converting their park into resident ownership is empowering. For instance, in a Minnesota ROC USA park called Park Plaza one resident described feeling "very scared" before the process began. Another resident worried: "We're common folk, where are we gonna come up with \$4.3 million [to purchase the park]?"⁶⁸ After receiving loan counseling, forming a co-op, receiving training to manage finances, and learning to use Robert's Rules of Order to manage park projects, residents no longer approached collaborative park management with fear, instead they felt empowered: "Everybody has a voice, you own a little piece of where you live."⁶⁹ Converting private poverty housing models like mobile home parks to collective affordable housing through cooperative ownership is just one example of how dignity restoration might be accomplished through attention to community-wide process. These residents' experience of empowerment highlights the efficacy of dignity restoration that targets collective identities and affirms social property.

66. ROC USA is a non-profit social enterprise that offers financing, training and networking to help homeowners gain security through community ownership. See *Public Policy Statement*, ROC USA <http://rocusa.org/about-us/public-policy.aspx> [https://perma.cc/24X2-ECAE].

67. ATUAHENE, *supra* note 5, at 4.

68. Daniel Zwerdling, *When Residents Take Ownership, A Mobile Home Community Thrives*, NAT'L PUB. RADIO (Dec. 27, 2016, 4:08 PM) (quotes taken directly from radio broadcast). A full transcript of the NPR story is available at <http://www.npr.org/templates/transcript/transcript.php?storyId=503052538> [https://perma.cc/H7AV-QDUZ].

69. *Id.*

