



Housing Justice Center
Dedicated to expanding
and preserving the supply
of affordable housing in
Minnesota and nationwide.

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April 17, 2026

John Marty, Chair
Senate Finance Committee
Minnesota Senate Bldg.
95 University Ave W
Room 1200
St. Paul, MN 55103

Re: Housing Justice Center Support of S.F. 203

Dear Chair Port and Members of the Housing and Homelessness Prevention Committee:

My name is Shana Tomenes, and I am an attorney at the Housing Justice Center. My primary area of practice is within manufactured home communities, where I respond to homeowner inquiries, provide legal education, and represent homeowners in individual and class action cases. But beyond my legal work, I also write to you as someone with personal experience—I have lived in a manufactured home, my husband grew up in a manufactured home community, and I have family members who are manufactured homeowners today.

I urge your strong support for the Manufactured Home Residents Bill of Rights, which is included in Senate File 203. This bill will help protect manufactured homeowners from exploitation and preserve manufactured housing as one of the few remaining paths to affordable homeownership. While the Housing Justice Center supports the bill in its entirety, I want to highlight two provisions that are especially critical: the requirement that lot rent increases be reasonable and the resident opportunity to purchase their communities.

Manufactured homeowners own their homes but rent the land beneath them. Unlike renters in traditional housing, they already pay most of the costs associated with homeownership—including home maintenance, lawn care, utilities, and property taxes. In many ways, they function much more like homeowners than tenants. Lot rent collected by park owners largely covers the land itself and limited shared infrastructure or amenities.

Yet homeowners who have invested their life savings into their homes are often trapped. Manufactured homes are extremely expensive to move and, in many cases, cannot be moved at all. Unlike renters, when lot rent skyrockets in manufactured home communities, homeowners can't simply move—they either pay or risk losing the largest asset they own. Because of this structure and power imbalance, rent increases in manufactured home parks are fundamentally different from rent increases in traditional rental housing. In recent years, large lot rent increases are increasingly untethered from the actual costs of operating the park. For example, a park in Lake Elmo, Cimarron Park and Golf Course, charges \$1,019 each month for lot rent in each of its 535 lots, resulting in

\$545,165 in *monthly* income. In contrast, Cimarron's *yearly* tax bill for 2024 for its six parcels covering 200 acres was \$179,770.

It's no surprise that over the past several years, large out-of-state private equity firms and corporate investors have rapidly acquired Minnesota's manufactured home parks. Their business model is simple: buy parks, raise rents aggressively, cut maintenance, and extract as much profit as possible from homeowners who cannot easily leave. I see the consequences of this model every day in my work. In the past four years, every manufactured home park case I have worked on has involved a corporate or out-of-state park owner. These cases consistently involve the same pattern—rapid rent increases, declining conditions, and homeowners who feel trapped in communities they once believed would provide stable, affordable housing.

These rent increases are often part of a larger speculative cycle. Investors buy parks and raise rents to inflate revenue, then sell the property at a higher price to another corporate buyer. The new owner then points to that inflated purchase price to justify even higher rents. Meanwhile, homeowners are notified only after the sale has happened and have no meaningful opportunity to keep their communities stable.

The Manufactured Housing Bill of Rights begins to break this cycle. By ensuring that rent increases remain reasonable and by giving residents the opportunity to purchase their communities before they are sold to corporate investors, this legislation would provide real protections for homeowners who have invested their lives and savings into these communities.

Manufactured housing is one of the most important sources of naturally occurring affordable homeownership in Minnesota. Without action, these communities will continue to be targeted by corporate investors seeking to extract profit from the very families who can least afford it.

I urge you to stand with Minnesota homeowners and support the Manufactured Housing Bill of Rights provision within Senate File 203.

Sincerely,



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