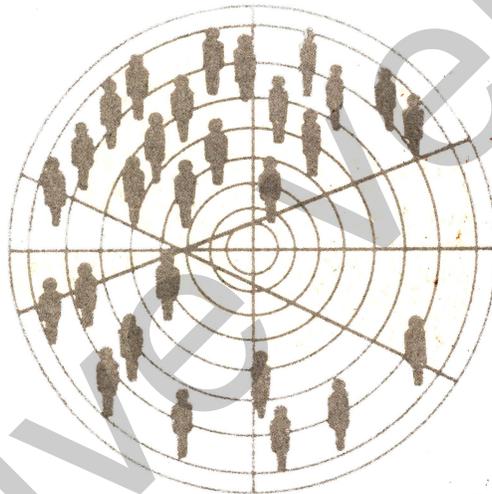


UNIVERSITY OF MISSOURI-COLUMBIA

Missouri Local Government Administrative Guide Series

Mobile Homes Challenges for Today and Tomorrow



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Preface

Five years ago when problems connected with mobile homes became eminent, the Governmental Affairs Program published Technical Bulletin No. 10, "Mobile Homes: Asset or Liability?" The purpose of this bulletin was to explain the mobile home phenomenon to people affected by mobile homes in one way or another, and to make suggestions on how to accommodate mobile homes.

Despite some resentment toward this new mode of housing, plus restrictions and exclusions, mobile homes have sprung up in Missouri in increasing numbers. They appear in metropolitan areas as well as in the countryside and are forcing state and local governments and other agencies to recognize them as a new way of shelter for people who are unable to find conventional housing within their means.

Numerous inquiries directed to the Governmental Affairs Program indicated that little is known about mobile homes on a state-wide basis, and for this reason it became of necessary importance to conduct a state-wide survey of mobile homes in Missouri. The following study is the result of research and surveys carried-out between September and December, 1973. Most parts of Missouri were

visited, and state and local government officials, bankers, realtors, dealers, and mobile home owners were interviewed.

During the survey it became evident that a different approach should be taken in analyzing the information gathered; therefore, only general statistics are presented in this study, and the emphasis is put more on the critical housing situation in Missouri, the human aspects, regulatory problems and possible solutions. It was also found that Technical Bulletin No. 10 * in principle was still valid and could be used as a follow-up, thereby eliminating duplication.

It is hoped that the study will encourage officials at all levels, and people affected by the issues of mobile homes, to take a human and common sense approach in solving problems with such a housing attitude. Boldness will be required and the challenge is worth fighting for; namely, to give all Americans a decent home of their choice in an environment of their choice.

* *Mobile Homes: Asset or Liability*, by Henry Galetschky, Governmental Affairs Program, University of Missouri, Columbia.

Introduction

Between 1963 and 1972, mobile home shipments in the United States increased by 282 percent, whereas all single family housing starts increased by only 65 percent (see Table 1). In 1972 mobile homes comprised 85 percent of all single family homes in the United States selling for less than \$20,000, according to the U.S. Department of Commerce. This should come as no surprise for the National Research Bureau in 1973 reported that a typical new house is priced today at \$34,100, up 33 percent from \$25,400 five years ago. Construction and maintenance of a conventional home is more costly, building materials costs have risen 11 percent in 1972-73 and typical homesites sell for one third more than five years ago, according to the Federal Housing Authority (FHA). If this trend continues, a typical new house may well be priced at \$50,000 by 1980.

The rising cost in conventional housing has accelerated mobile home shipments and many families, not only those in low and moderate income groups, consider mobile homes as their best housing option.

Turning to Missouri, approximately 127,200 persons, or 2.7 percent of the population, live in 50,878 mobile homes as reported by the U.S. Census of Housing in 1970. Mobile homes increased dramatically in Missouri since 1950 as shown in the following table:

Year	No. of Mobile Homes	Percent change
1950	5,444	—
1960	16,613	205%
1970	50,878	206%
1973*	75,000	47%

Source. U.S. Census of Housing, 1950-70
 * Estimate based on field survey, 1973

The 1973 estimate should be considered conservative in light of about 37,000 units shipped to Missouri between 1970 and 1973. Although there are now more census data available pertaining to mobile homes than in the past, only some "selected housing characteristics", as shown in Table 2, are presented in this study because it is felt that too many statistics may lead to perplexities. *

Mobile homes in Missouri represented 3.1 percent of all housing units in 1970; however, if the city of St. Louis is excluded, because there were only

105 mobile homes out of 238,436 total housing units within the city limits, then mobile homes would represent 3.7 percent of all housing units. It is interesting to note that in 1950 this proportion was about .5 percent and in 1960 1.5 percent.

Plate 1 shows that, contrary to common belief, mobile homes are no longer found mostly in rural areas. Inside metropolitan areas the number of mobile homes represent 38.9 percent of all mobile homes in Missouri, indeed a sizable share. Breaking it down by metropolitan areas, we find the following percentage increases over 1960: Springfield - 275 percent, Columbia - 238 percent, St. Louis - 170 percent, St. Joseph - 83 percent and Kansas City - 53.4 percent.

In order to have some sort of a comparison, mobile homes, as shown on Plate 1, were identified as a percent of total housing units. Readily it can be seen that the major concentration of mobile homes occurred along the interstate systems, ** giving people ready access to places of employment. In addition, college cities display a higher incidence of mobile home use than non-college cities.

In Pulaski County, however, a proportion of 18.1 percent was found, but this is due to the military base of Fort Leonard Wood and should be considered an exception rather than a trend. The Lake of the Ozarks and Table Rock Lake areas accommodate a great number of retired people who have found that mobile home living is the only housing they can afford economically and comfortably. Also, the rocky topography makes it difficult to excavate foundations for conventional housing, therefore, a mobile home is cheaper and easier to set. However, it was found during the survey that an enormous price will have to be paid in the future to provide these numerous mobile homes, as well as the conventional homes, with adequate and efficient sewer systems. This definitely indicates an urgent need for counties not having any development controls to adopt planning and zoning. As it stands now, the most desirable mobile home parks are found in counties that have controls such as planning and zoning; the less desirable parks are in areas or counties without controls. Considering the difficulty in achieving efficient government at all levels, good planning and reasonable zoning regulations will become necessary.

* Not included are mobile homes or trailers if vacant, used only for business, or used only for vacation.

** Detailed statistics by counties are found in Appendix A.

TABLE 1
Housing Starts 1963-73
United States

Year	Single Family Housing Starts	Mobile Homes Shipments	Total Housing Units	Mobile Homes as a % of Single Family Housing Starts
1963	1,144,940	150,840	1,148,040	13.2
1964	1,161,800	191,300	1,720,100	16.5
1965	1,180,300	216,500	1,689,400	18.3
1966	995,800	217,300	1,382,200	21.8
1967	1,084,200	240,400	1,531,900	22.2
1968	1,217,400	318,000	1,825,500	26.1
1969	1,223,300	412,700	1,879,400	33.7
1970	1,214,100	401,200	1,834,800	33.0
1971	1,647,600	496,600	2,548,800	30.1
1972	1,885,200	575,900	2,932,600	30.5
1973*	1,392,500	465,600	2,135,300	33.4

Source: Housing Starts, Construction Reports, U.S. Department of Commerce October 1973.

* Only January through September data available.

TABLE 2
Selected Housing Characteristics
State of Missouri
1970

	<i>Mobile Homes</i>						
	All Housing Units	Total	As a % of All Housing Units	As a % of All Mobile Homes	Owner Occupied	Percent	Renter Occupied
The State	1,665,506	50,878	3.1	100.0	41,501	81.6	9,377
Inside SMSA	1,027,622	19,786	1.9	38.9	16,409	82.9	3,377
Outside SMSA	637,884	31,092	4.9	61.1	25,092	80.7	6,000
Urban	1,141,001	16,249	1.4	31.9	12,715	78.3	3,534
Rural (Total)	524,505	34,629	6.6	68.1	28,786	83.1	5,843
Rural Non-Farm	395,427	30,509	7.7	60.0	25,101	82.3	5,408
Occupied Farm	129,078	4,120	3.2	8.1	3,685	89.4	435

Source: U.S. Census of Housing, 1970

Mobile Home Parks

In the preceding chapter the distribution and concentration of mobile homes in Missouri was discussed. Now let's turn to the mobile home parks in Missouri — where are they located and are they of any quality.

Woodall, a national organization, each year conducts detailed surveys of mobile home parks and publishes the results in its *Mobile Home and Park Directory*, also called the "bible" of the mobile home industry. Of more than 24,000 parks in the United States, fewer than 13,000 meet the minimum requirements necessary for listing in the directory. (This proportion also holds true for Missouri, based on spot checks).

Woodall's directory for 1973 lists 349 mobile home parks in Missouri which meet their standards and are rated on the basis of one to five stars. This is an increase of 155 mobile home parks over 1970, when only 196 parks were listed. In those 351 mobile home parks there are about 25,400 homesites. Plate 2 shows the location of these rated mobile home parks by counties. The table below gives a brief overview of rated parks in Missouri in order of rank.

*Missouri Rated Mobile Home Parks
in Their Order of Rank*

	Number	Percent of Total	Number of Homesites
5 Star	0	0	0
4 Star	21	6.0	3,726
3 Star	71	20.3	6,652
2 Star	111	31.8	6,089
1 Star	104	29.8	4,812
New (unable to rate)	25	7.2	1,934
Rebuilding (unable to rate)	5	1.4	487
Under Construction	12	3.5	1,693
Total	349	100.0	25,393

Source: Woodall's *Mobile Home and Park Directory*, 1973 edition.

Some of the criteria to qualify to be rated are given in Table 3.

Although Missouri does not have any five star mobile home parks, it may be of interest to list the five star criteria in order to point out that the mobile home industry is concerned about quality parks, so parks may become assets to the community instead of liabilities. Furthermore, in community develop-

ment the five star criteria could be used as guidelines. In addition to the four stars described in Table 3, a five star park must have the following:

1. Well planned and laid out spacious appearance;
2. Good location in regard to accessibility and desirable neighborhood (in some locations parks should be enclosed by hedge or ornamental fence);
3. Wide paved streets in perfect condition, curbs or lawns scrupulously edged to streets, sidewalks, street lights, street signs;
4. Homes set back from street;
5. Patios or porches at least 320 sq. ft. on all homes (except double wide units);
5. Paved two-car off-street parking;
7. All homes completely skirted with quality skirting;
8. Awnings or cabanas and carport on all homes;
9. Uniform storage sheds at all homes;
10. All hitches and jack posts concealed — no tanks or bottles;
11. Beautifully equipped recreation hall with kitchen — room for community gatherings;
12. Recreation, some or all of the following: swimming pool, shuffleboard, horseshoe pitching, golf course, hobby shop, hobby classes, games, dances or natural recreational facilities;
13. All late model homes in excellent condition;
14. At least 75% occupancy in order to judge quality of residents which indicates park's ability to maintain a five star rating between inspections;
15. All empty lots grassed, graveled, or otherwise well maintained;
16. If pets or children allowed, there must be a place for them to run and play without cluttering the streets and yards; and
17. Superior on-duty management interested in comfort of residents and maintenance of parks.

In Plate 2, again, we find the same pattern of distribution as on Plate 1. The best parks are located along the interstate system and in metropolitan areas. As pointed out before, Greene County has the largest number of highly rated mobile home parks, some of them could even qualify for the fifth star based upon personal inspection by the writer.

A question often asked is how much rent is being charged for a mobile homesite. Woodall's Park

Development Service furnished this information applicable to Missouri. There are: 3 parks charging \$10-19 per month; 110 parks charging \$20-29 per month; 134 parks charging \$30-39 per month; 83 parks charging \$40-59 per month; and 13 parks charging \$60-100 per month.

Most parks visited by the writer charged between \$35 and \$50. The overall vacancy rate in mobile home parks in 1973 was less than 10 percent, with the highest vacancy rate in four star parks, probably because they are somewhat more expensive, and park operators are more discriminating in accepting tenants.

Based on observations and interviews made by the writer in visiting mobile home parks, the majority of people living in mobile homes in Missouri are in the age groups 35 and younger and 55 and older.

Although, to the writer's knowledge, no recent socio-economic composition of the average mobile home owner in Missouri is available, the following table pertaining to the United States may serve as a guide:

	PERCENT	
	1960	1970
Professional, Technical and Kindred Workers	5.1	10.8
Managers, Officers and Proprietors	5.1	12.3
Crafts, Foremen and Kindred Workers	21.4	13.9
Operators and Kindred Occupations	18.8	12.3
Clerical, Sales and Kindred Workers	6.7	11.2
Service Workers	4.4	6.5
Active Military Duty	7.8	1.3
Laborers	6.8	3.9
Others, Retired, Housewives, Students, etc.	23.9	27.8

Source: U.S. Census of Population, 1960; Department of Housing and Urban Development, *Housing Surveys*, 1968. National Housing Index, 1974.

However, in talking to mobile home park operators, mobile home dealers and representatives of the Mobile Home Manufacturers Association, it was pointed out that the professional and manager categories increased to about 11 and 12 percent respectively in 1973. In general, one will find in our mobile

home parks in Missouri the same mix of people as one does in conventional subdivisions. Chances are that economic integration will be found more readily in mobile home parks than in other places.

Furthermore, mobile home park management usually impose strict rules and regulations upon mobile home dwellers in order to maintain quality parks and, because of high densities, to give all mobile home dwellers the same rights, privileges, and privacy. A sample copy of rules and regulations pertaining to a four star mobile home park is found in Appendix B.

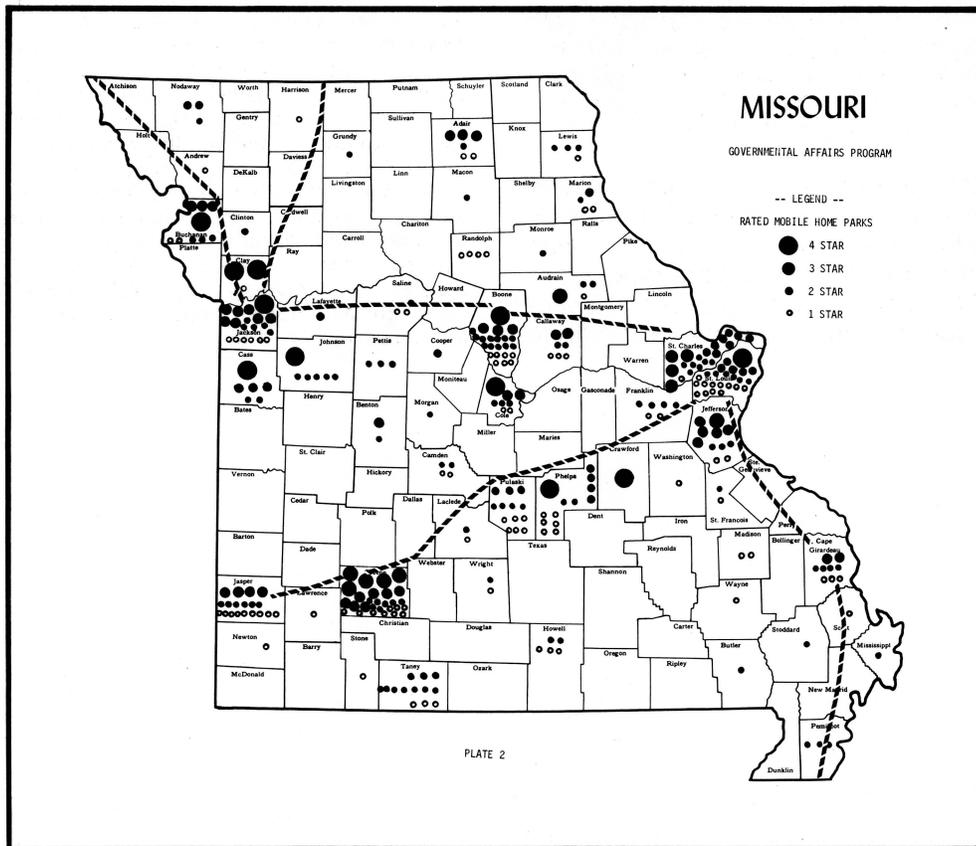
In concluding this section of the study, it may be of interest to note that beginning in December 1973, a new monthly survey of the mobile homes industry will be taken by the Census Bureau in cooperation with the Department of Housing and Urban Development.* The survey will supply continuing statistics on mobile homes similar to statistics now provided by the Bureau on conventional housing. The decision to launch the survey indicates the importance of the mobile home industry, which now supplies about one-fifth of the additions to the nation's housing inventory and accounts for about one out of every three one-family dwellings. The survey was recommended by the President's Cabinet Committee on Construction.

* HUD-Newsletter, July 2, 1973.

First step will be a mailing of questionnaires to the manufacturers of mobile homes asking for lists of the names and locations of their dealer outlets. When the lists have been compiled, a sample of the dealers will be selected and surveyed each month for information on the number and location of new mobile home placements. The statistics thus obtained will then be used to estimate national and regional placements of the homes. The Bureau expects to publish the monthly reports with information on the number of mobile homes placed in the United States, in each of the four Census Regions (Northeast, North Central, South and West), and eventually for selected local areas where substantial numbers of mobile homes are being placed. Cooperating with the Bureau in this new project are a number of housing and other associations including the Mobile Home Manufacturers Association, state trade groups, state agencies, trade publications and other interested groups.

TABLE 3
Rating Criteria

1 Star	2 Star
<p>Fair overall appearance, patios, grass, rock to cover ground Streets fair to good Restrooms clean, if any Homes old but cared for Mail service Manager available for some hours</p>	<p>In addition to 1 star: Landscaping Streets good condition Neat storage Laundry-Laundromat Free of clutter Well maintained & managed</p>
3 Star	4 Star
<p>In addition to 1 & 2 stars: Park sign near entrance Homes in good condition Awnings or cabanas Paved or hard surface streets Off-street or safe on-street parking Good lawns, trees Concrete patios, porch, cabana All lots neat, attractive Park buildings in good repairs Good management</p>	<p>LUXURY PARK which must have in addition to 1, 2 & 3: Good landscaping 75-98% of homes skirted Paved, edged, curbed streets Uncrowded lots Underground utilities All tanks concealed Hedges, fences attractive To accommodate large homes Off-street parking Equipped play area for children Community hall, swimming pool Excellent management</p>



The Setting

Before going any further, some of the mobile home issues should be discussed. There has always been a housing shortage; in some years the goals of producing 2.3 or 2.5 million housing units per year (nationally) were met, in other years they were not. Concern was focused mainly on housing for poor or moderate income families, but now everything has changed because there is a scarcity of resources, including fuel for energy, with tremendous ramifications to the building industry. Because of the oil shortage the building industry is going to have trouble getting asphalt, which is derived from petroleum; shingels, which are often made of asphalt; propane gas heating fuel, for keeping construction workers warm, and diesel fuel for construction equipment.

Now everyone is affected, not only the poor, although it will hit them the hardest. It has become under present conditions nearly impossible, even for middle-class families, to buy a home - the ultimate realization of the American Dream.

Missouri has the following situation. There were 1,204,751 families reported by the 1970 U.S. Census. Of these, 1,159,861 families, or 57.5 percent, had a family income of less than \$10,000. The median family income in 1970 in Missouri was \$8,914 as compared to the national median of \$9,400. We are safe to assume that in 1973 Missouri's median income was about \$10,000. If a family with a \$10,000 income wanted to buy a home they could afford, a \$20,000 to \$25,000 home would be the range.* High interest rates, however, have reduced the "rule of thumb" proportion to only two times the annual income. In other words, the family in our example can only afford a \$20,000 home. (This home could be bought for \$10,000 in 1960!) However, since a 25 percent down payment is required, it is, under current market conditions, almost impossible for this family to raise \$5,000 down payment plus closing costs. Virtually the only option this family has is to turn to a mobile home.

Currently, mobile homes in Missouri are not so much low-cost housing for low-income people, but modern shelters which gain more recognition and appeal to even high income families and individuals.**

Another attraction of mobile homes is their low price and small down payment. In 1973, the average price of a 12 x 60 foot mobile home completely furnished was about \$6,000. Down payments in Missouri are generally 15 percent and the balance of the loan is to be paid over seven years. Although FHA

loans are available, it was found that lenders in Missouri are hesitant to take this route of financing and prefer less complicated commercial financing, similar to financing an automobile. Here is an example of the monthly cost of a mobile home based on a purchase price of \$6,000, with \$900 down payment and financing of the \$5,100 balance:

Monthly loan payment on a 12' x 60' mobile home, balance \$5,100 at 7% (11.69% add on) over 7 years	\$90.46
Insurance	8.38
Utilities	40.00
Space rental	45.00
Total	\$183.84

The above example applies to a new mobile home located in an "above-average" mobile home park. Depending on the preferences of a mobile home dweller, the total monthly cost will change. In summary, mobile homes are low-cost housing with high-cost financing, and, whenever funds for mortgages on conventional housing become scarce, higher financing costs attract funds to mobile home lending institutions.

Another issue that should be discussed is that of taxation. The most common arguments against mobile home owners are still found in Missouri, such as "they don't pay their fair share", or, "they have so many kids who overburden our school district". Taking the latter statement first, it was found that school officials do not have sufficient data to substantiate the notion that mobile home owners have more children of school age than conventional home owners. The study conducted by the writer revealed that the typical mobile home family size in Missouri is about 2.5 persons or less. There may be exceptions, however, and therefore each area in Missouri should conduct its own fact finding. For example, in a southern county it was found during the periods of construction activity, itinerant construction workers moved in, sent their children to the local school, used all the public facilities, and,

*According to the rule of thumb 2½ times the annual income can be expended for shelter. Many financial advisers today regard 1½ times salary as a more sensible limit. *Business Week*, 2-2-74.

**The Colony Mobile Home Park in California is the most expensive Mobile Home Park in the Nation, as reported by *Business Week*, 8-23-73. Rents range from \$265 to \$350 for one fifth of an acre.

after construction, moved on to greener pastures without having paid for the services they enjoyed for a large part of the year.

Turning to the "fair share" myth, it is the writer's belief that any inequity is caused by laws in regard to property taxation, and the shortsightedness of local government and planning commissions in trying to exclude mobile homes and their occupants from the mainstream of community life. In the past, this has been done either by not allowing mobile homes within city limits, or to confine them in commercial or industrial districts or in areas where land is virtually valueless for various topographic reasons, and useless for residential development. As a consequence, the creation of mobile home slums has been encouraged. Indeed, where policies like these are accepted, mobile homes are bound to become liabilities to the community instead of assets. This study of mobile homes in Missouri revealed that mobile home owners are perfectly willing to make their contributions to the community if given a chance to be recognized as equals.

At the present time, mobile homes in Missouri are taxed as personal property. All guidelines for assessing mobile homes are laid down in the *State of Missouri Book for Assessment - Mobile Homes*. Yet, assessment practices vary in Missouri county by county, for some of the following reasons:

1. An accurate count of mobile homes is sometimes not possible because the assessor's office is short handed;
2. For socio-economic reasons mobile homes are assessed at a somewhat lower rate;
3. Some counties depreciate mobile homes for about 6 years down to \$600 or \$400, where it stays;
4. Some counties in following the *Book of Assessment* depreciate the mobile home down to zero, according to the depreciation table.
5. In township-form of governments, sheriff's deputies carry assessment forms in their cars at all times and once a new mobile home is located, an assessment form is passed on to the owner to be filled out (this way the county is able to account for all property);

6. Some counties identify mobile homes on their tax books as such, others do not and, therefore, do not know how many mobile homes are within the county; and

7. It was also found in several instances that mobile homes were assessed at a higher rate than conventional homes.

The above examples indicate some degree of confusion as to how to deal with this strange phenomenon—the *mobile home*. Nevertheless, county assessors are doing a conscientious job in trying to account for all the property in their respective counties. That there are some shortcomings is not so much their fault as the inadequacy of present state laws. One step in the right direction has been taken to solve the controversy of whether or not a mobile home is personal property or real estate. There is Senate Bill No. 338 pending in the 77th General Assembly relating to taxation of mobile homes. It reads as follows:

Section 1. 1. All buildings, structures or facilities designed or intended for residential occupancy shall be classified for tax purposes as real property and taxed along with the land on which it is located; except that, buildings, structures or facilities which use wheels, axles, frames or wheel-axle-frame combinations in place of a permanent foundation and are commonly known as mobile homes or house trailers shall be classified as tangible personal property for the first assessment year that they are occupied for residential purposes by the initial purchaser.

2. Notwithstanding the provisions of subsection 1, a mobile home or house trailer which is placed on the private property of some individual, with adequate piers and underpinning or a permanent foundation, without wheels, axles and hitch, shall be classified as real property.

The inference drawn from the above is that the mobile home has come to be considered a residence, and not merely a temporary shelter. The ramifications will be discussed in the next section.

Issues and Challenges

Now what is going to be done with the 127,000 people in Missouri who live in mobile homes; how are they affected by present laws; and what are the challenges to local governments, planning commissions, and citizens at large? These problems are expressed in the following letter to the editor of a Missouri newspaper:

"However . . . the county planning commission may phrase it . . . whatever euphemisms they may use . . . regardless of the publicity rationale, the fact remains that the new county zoning is intended to ghettoize the occupants and owners of mobile homes.

Forcing the concentration of mobile homes into crowded trailer parks is, when bared of all veneer, the very worst kind of econo-realty chauvinism. . . . where are all the sociology professors, bleeding hearts and do-gooders when these people really need them?

Past experience has shown that a vocal group . . . can protect their interests with appearances of large numbers of interested citizens before the county court. Perhaps the same system would work for mobile home dwellers."

Admittedly, the letter above expresses emotional overtones, but it does point out that a long, hard look at present ordinances regulating mobile homes is needed. In doing this, the following facts are needed to find reasonable answers and possible solutions:

1. Regardless of restrictive or exclusionary practices, mobile homes have moved in and are here to stay. (Between 1950 and 1970 mobile homes increased by 835 percent.);
2. The housing market is not able to provide adequate housing to accommodate low and middle income groups; and
3. 57.7 percent of all Missouri families were making less than \$10,000 in 1970. If housing needs arise, many of them will be unable to obtain adequate housing within their means.

For a better understanding of the challenges, here are some projections about what the future might bear in regard to housing. On December 10, 1973, the Office of Public Affairs of the Department of Housing and Urban Development in its *Newsletter* reported on the opinion of 32 well-qualified construction industry observers who participated in a study of construction industry, "Futures." Here are some of the highlights:

1. The energy shortage is expected to produce legislation between 1973-75 that will force a

reduction in energy consumption by commercial buildings;

2. During the same period, ecology groups are expected to slow the growth of at least 20-30 percent of the Nation's fast growth population areas;
3. Between 1973 and 1980 multi-family starts will rise from 45 percent to 60 percent of all new conventional housing, partially caused by a doubling in the number of condominiums/co-ops;
4. Some of this housing will be built in five "new cities" the size of Reston (Virginia) or Columbia (Maryland);
5. Security will be an increasing problem with some feeling that walled city concepts may be prevalent at this time;
6. Heating costs are expected to increase 50 percent in real terms, resulting in 50 percent higher expenditures for insulation products to conserve energy;
7. National building codes will make modular residential construction a dominant factor;
8. Increased land and construction costs will result in smaller houses. Mobile homes, expecting to be produced at a rate of 750,000 units per year, will be subject to the same taxing, building codes and quality specification as conventional housing;
9. By 1990 - new building materials, light as magnesium, but strong as steel, will change methods of construction;
10. Wireless transmission of energy should also have a major impact on building design;
11. Solar energy collectors will be on the scene, further changing present-day concepts of building design;
12. The modular builder of today will not necessarily be the builder of tomorrow. The major conventional home builders of today will represent only one-half of the companies producing modulars, with building materials companies, major conglomerates and new companies moving onto the scene in increasing numbers; and
13. The advent of modulars is seen as a cause for major change in distribution channels, with many more direct sales to the builder and with much more sophisticated buying practices based on value analysis.

In conclusion, in looking at today and into the future, mobile homes, modulars, and all other hous-

ing concepts will indeed present challenges for today and tomorrow.

In addition to the above, some philosophical thoughts should be considered so ordinances can be seen from a 1974 viewpoint. Almost each year Congress reaffirms the national housing goal that every American is entitled to a decent home and a suitable living environment. Also, in 1970 Secretary Romney stated before the Senate Select Committee on Equal Educational Opportunity:

"This Department is deeply involved in assuring all Americans both the 'right to choose' and the 'ability to choose'. These are the basic goals of our Department's evolving 'open communities' policy . . .

Although policies and programs in the spirit of the above statements were to a degree successful in alleviating slum and deteriorating housing conditions, the continued rise in the cost of housing may lead to a housing crisis in addition to the energy crisis. So it appears, since better solutions have not come up, the mobile home in its numerous styles of design, is one answer to the problem. Now, ways to accommodate this new form of housing must be found within the framework of existing laws or through clarification and creation of new laws.

In order to gain an understanding of zoning ordinances as they are in Missouri, some of the discriminatory practices embedded in zoning ordinances need to be discussed. It is not the intent of this writer to condemn officials, planning commissioners, and planners who were instrumental in drawing-up these ordinances; all people were extremely conscientious in interpreting and employing Missouri statutes to protect the health, safety, morals, and general welfare of the community but, in their desire to be as conscientious as possible, the question might arise: "when has regulation gone far enough to become an infringement on individual rights."

Under certain conditions mobile homes are considered non-conforming uses unless otherwise specified. Now assume after 6-7 years the owner decides to replace his mobile home with a new one. Is he permitted to do this? Or, a mobile home (non-conforming use) burns down. According to the ordinance he cannot replace his mobile home even though he owns the land. What is he going to do?

Next situation: A family owns a \$25,000 home and it burns down. Home-owner's insurance pays \$15,000 for loss. Replacement costs are too high because of construction, mortgage, and insurance costs. The family decides to buy a double-wide mobile home for \$10,000-\$12,000 and put it on their lot. Will the family be permitted to do so?

The above examples are intricate but decisions have to be made. For example, take a mobile home park, 20 years old, 3 acres in area, with 34 mobile homes 10 years and older. The occupants are retired people on social security and blue collar workers averaging \$7,000 in annual income. A mo-

bile home park ordinance has been enacted which puts the park in violation of the ordinance because of density, set-back restrictions, etc. As a consequence, litigation becomes imminent. Is it the intent of the ordinance to evict old people (because they would be the first ones who would have to leave), to achieve the allowed density and prescribed set-backs and side yards? Certainly not, but since it is the duty of local government to protect the safety and welfare of the entire community, exceptions cannot be made, rather a reasonable solution must be found to accommodate all parties involved.

Here is a possible solution to the above problem, already suggested by the writer and tested successfully in Missouri: The city engineer (or his equivalent), the planning commission, and the park operator should discuss the matter and develop a timetable. The timetable will delineate on an annual basis what has to be done to up-grade the park to eventually meet minimum standards. Since the park operator will have to obtain a license to operate the park each year, this license may be refused if he has not complied with the "timetable." The advantage of this approach is that the park owner can protect his investment and still receive a fair rate of return, and on the other hand, the mobile home occupants are not harassed or aggravated by the threat of eviction and will enjoy the protection of the law.

At this point, a Michigan court decision should be of great interest. *

A city ordinance permitted mobile homes in a commercial district, but the trial court had found that its effect was to exclude mobile homes totally because there was practically no vacant land left in the commercial category.

"A city ordinance excluding or severely restricting mobile home parks will not be presumed to be valid, and the burden is upon the municipality to justify the ordinance in light of needs of the neighboring communities as well as its own. This is a balance between the effect of local considerations, concerns, and desires and the greater public interest of the region whenever a particular favored use is involved. A particular favored use is a use that advances the general public interest as evidenced by state constitutions, statutes, judicial precedents, or a combination of these factors." (Bristow v. City of Woodhaven, Court of Appeals of Michigan, Division 1 (intermediate court), Decided July 26, 1971, Leave to Appeal Denied November 11, 1971, Released for Publication December 21, 1971, 192 N.W. 2d 322.)

In this case the court went on to say that the protection thus afforded mobile home parks took on greater significance "in view of the massive nationwide housing shortage which necessitates a re-defining of the term 'general welfare' as applied to justify residential zoning."

* 24 *Zoning Digest* 1 (1972). Reprinted with permission of the American Society of Planning Officials, Chicago, Illinois.

“That term is not a mere catchword to permit the translation of narrow desires into ordinances which discriminate against or operate to exclude certain residential uses deemed beneficial. Citizens of the general community have a right to decently placed, suitable housing within their means and such right must be a consideration in assessing the reasonableness of local zoning prescribing residential requirements or prohibitions. Such zoning may never stand where its primary purpose is shown to operate for the exclusion of a certain element of residential dwellers.”

Although there are no similar cases pertaining to mobile homes in Missouri, it should be noted and compared to local situations more closely in light of what has happened over the past 20 years.

Previously, another stumbling block in accepting mobile homes was local building codes. These codes were not uniform in Missouri communities making it almost impossible for mass produced mobile homes to comply. However, January 1, 1974, Missouri passed a law pertaining to uniform standards for mobile homes.

On August 9, 1973, Governor Bond signed into law Act 181, House Bill No. 98, establishing uniform standards for mobile homes and recreational vehicles, providing for inspection and fees, and with penalty provisions. The act will alleviate much controversy surrounding mobile homes in regard to building, electrical and plumbing codes, and structural properties. The standards established in the act were promulgated by the American National Standards Institute and identified as ANSI A119.1 relating to mobile homes and A119.2 relating to recreational vehicles. In approving this act, Missouri has joined 34 other states which had recognized ANSI Standard A119.1 for mobile homes, either directly or as a guideline.

A119.1 specifies standards for mobile homes in regard to body and frame design, construction requirements, and the installation of plumbing, heating and electrical systems.

Of interest in the act is the definition of a mobile home: “Mobile Home means a factory built structure or structures more than eight feet in width equipped with the necessary service connections and made so as to be readily movable as a unit or units . . . and designed to be used as a dwelling unit without a permanent foundation.”

Any mobile home or recreational vehicle manufactured after January 1, 1974, must bear a seal issued by the Public Service Commission (the inspection agency) evidencing that the mobile complies with A119.1 or A119.2 respectively for recreational vehicles.

Furthermore, mobile homes or recreational vehicles shipped to Missouri from other states must comply with standards which are at least equal to those provided in A119.1 and 2 and approved by the Public Service Commission.

Very important to local governments is Section 7 of the act which reads as follows:

“If a mobile home or recreational vehicle carries a seal as provided in this act, no agency of this state, nor any municipality or other local governmental body shall require such mobile home or recreational vehicle to comply with any other building, plumbing, heating or electrical code other than the code established by this act.”

Section 7, also, will facilitate drawing up mobile home park ordinances in the future. Instead of spelling out in detail the various requirements of electrical, plumbing and other codes, in order to make a mobile home acceptable to local conditions or regulations, one paragraph should suffice in explaining all codes by stating that all mobile homes have to comply to ANSI A119.1 or 2 respectively.

In addition, all mobile homes located in Missouri will have to be anchored and tied down in accordance with the standards promulgated by the Division of Health of the State Department of Public Health and Welfare, pursuant to the provisions of this act. After the Division of Health has developed the minimum tiedown standards, copies of the standards will be distributed to all mobile home dealers, and to persons selling tiedown systems and other persons requesting a copy. Before any tiedown system is sold, a letter of approval from the Division of Health approving the system must be prominently displayed at the place of business selling the tiedown systems. Also, a copy of the letter of approval will have to be furnished each person purchasing the anchor or tiedown system.

However, mobile homes purchased prior to 60 days after the effective date of this act will have a grace period of one year to comply with the act.

In light of the evergrowing number of mobile homes in Missouri this act should be considered as a milestone in providing quality uniform standards in low cost housing and protection to low and moderate income families in the future. Missouri is now one of 42 states that have adopted this code either by law or by using it as a guideline. (The implementation procedures are found in Appendix C).

What are the consequences of what has been discussed in this section of the study? Policies will have to change and people's right to choose what kind of housing they want and where to live must be acknowledged. In order to accommodate people the following policies are suggested:

1. There should be well designed mobile home parks in residentially zoned areas where people can rent their space;
2. There should be well designed mobile home sub-divisions where people can buy property, permanently attach their mobile home to the ground, and become property owners if they so desire - property would be treated as real estate;
3. Double-wide mobile homes should be allowed on individual lots provided they com-

- ply with the restrictions imposed by the zoning ordinance and have no adverse effect on the surrounding neighborhood. There are already cities in Missouri that allow double-wides on individual city lots;
4. In unincorporated areas where individual, conventional residences are allowed according to the zoning ordinance, mobile homes should be allowed also. This suggestion may be open for debate but, in looking into the future, there may not be any other choice;
 5. In writing or reviewing zoning ordinances,

the mobile home as a non-conforming use should be scrutinized in order to lessen hardships on the individual; and

6. In eliminating pockets of blight in residential areas, substandard housing, (inadequate student housing, public housing etc.), the possibility of utilizing double-wide mobile homes should be taken in consideration.

These policy suggestions are by no means revolutionary; the quiet invasion of mobile homes in Missouri has already established these policies de facto.

Suggested Reading

Governmental Affairs Bulletin No. 10
Mobile Homes: Asset or Liability, by Henry Galetschky
Governmental Affairs Program, 306 Watson Place,
Columbia, Mo. 65201

Technical Bulletin 66 and 68
Mobile Home Parks, Part 1 and 2
Urban Land Institute
1200 18th Street, N.W., Washington, D.C. 20036

Policy Alternative for Mobile Homes, by Constance B. Gibson,
Center for Urban Policy Research
Rutgers University
New Brunswick, New Jersey

Woodall's Mobile Home & Park Directory, 1973
Woodall Publishing Company
500 Hyacinth Place
Highland Park, Illinois 60035

Mobile Homes in New England
New England Economic Review, May/June, 1970
Federal Reserve Bank of Boston

Appendix A

Mobile Homes 1970

	Total Mobile Homes			Rural	Occupied Rural Farm	Total Housing Units 1970	Mobile Homes in 1970 as % of Total Housing Units
	1950	1960	1970				
Adair	41	198	500	228	47	8,222	6.1
Andrew	30	56	199	112	9	4,420	4.5
Atchison	14	52	176	121	14	3,469	5.1
Audrain	69	76	452	333	90	9,100	5.0
Barry	15	70	277	248	42	7,888	3.5
Barton	7	35	125	70	7	4,402	2.8
Bates	29	40	244	206	25	6,468	3.8
Benton	9	37	185	185	27	6,414	2.9
Bollinger	9	17	119	119	—	3,541	3.4
Boone	487	804	2,714	1,200	242	25,862	10.5
Buchanan	166	443	812	278	24	32,101	2.5
Butler	64	122	394	333	37	13,006	3.0
Caldwell	8	38	87	87	15	3,470	2.5
Callaway	22	142	615	564	41	8,090	7.6
Camden	6	92	594	594	141	9,628	6.2
Cape Girardeau	55	91	612	252	24	16,698	3.7
Carroll	30	43	188	113	30	5,122	3.7
Carter	4	22	60	60	5	1,547	3.9
Cass	37	612	1,121	650	51	13,112	8.5
Cedar	10	33	196	123	37	4,074	4.8
Chariton	16	41	195	195	40	4,562	4.3
Christian	6	52	445	445	40	5,463	8.1
Clark	18	53	212	212	25	3,152	67
Clay	306	570	825	157	31	39,942	2.1
Clinton	22	46	160	142	21	4,698	1.3
Cole	29	134	596	423	88	14,884	4.0
Cooper	18	80	237	151	30	5,291	4.5
Crawford	6	45	326	321	34	6,310	5.2
Dade	—	16	53	53	9	2,934	1.8
Dallas	5	20	187	187	48	4,047	4.6
Daviess	6	55	146	146	40	3,723	3.9
DeKalb	18	33	98	53	11	2,869	3.4
Dent	6	48	262	116	34	4,467	5.9
Douglas	8	4	141	103	15	3,609	3.9
Dunklin	59	92	366	215	18	12,565	2.9
Franklin	47	369	1,582	1,069	99	19,345	8.2
Gasconade	14	72	298	201	47	4,978	6.0
Gentry	6	27	97	97	21	3,492	2.8
Greene	182	571	2,144	961	103	54,174	4.0
Grundy	9	51	150	125	7	4,942	3.0
Harrison	10	32	153	64	15	4,558	3.4
Henry	22	94	307	138	26	7,745	4.0
Hickory	—	44	178	178	39	2,572	5.8
Holt	19	28	92	92	26	3,262	2.8
Howard	13	76	165	135	23	3,829	4.3
Howell	15	44	405	373	25	9,090	4.5
Iron	8	37	244	244	9	3,801	6.4
Jackson	802	1,583	2,411	494	60	241,525	10.0
Jasper	87	221	763	559	48	30,999	2.5
Jefferson	45	601	3,324	3,273	146	33,285	10.0
Johnson	46	483	1,071	746	40	10,555	10.1
Knox	4	20	103	103	27	2,388	4.3

Laclede	10	60	414	380	76	7,294	5.7
Lafayette	37	68	503	224	50	9,422	5.3
Lawrence	19	60	303	258	24	9,394	3.2
Lewis	37	121	362	300	35	3,919	9.2
Lincoln	11	75	487	438	76	7,146	6.8
Linn	28	97	198	84	21	6,547	3.0
Livingston	38	91	342	157	29	5,950	5.7
McDonald	23	32	326	326	62	4,987	6.5
Macon	20	133	332	192	34	6,472	5.1
Madison	18	8	133	61	23	3,829	3.5
Maries	2	21	130	130	10	2,796	4.6
Marion	44	129	360	216	52	10,799	3.3
Mercer	6	38	69	69	9	2,265	3.0
Miller	11	71	558	402	66	5,763	9.7
Mississippi	22	47	155	91	10	5,561	2.8
Moniteau	8	40	172	110	17	4,106	4.2
Monroe	9	60	176	176	37	3,808	4.6
Montgomery	13	44	202	202	41	4,489	4.5
Morgan	13	57	233	233	73	5,908	3.9
New Madrid	48	97	397	262	14	8,179	4.9
Newton	38	78	708	653	61	12,140	5.8
Nodaway	28	80	280	155	16	7,782	3.6
Oregon	6	24	198	198	4	3,777	5.2
Osage	7	64	203	203	16	3,794	5.6
Ozark	—	15	62	62	20	2,747	2.3
Pemiscot	38	82	217	92	9	9,801	2.2
Perry	12	27	233	161	43	5,166	4.5
Pettis	53	119	297	215	19	12,914	2.3
Phelps	64	295	995	646	39	9,908	10.0
Pike	71	130	396	229	79	6,665	5.9
Platte	61	279	314	107	12	10,352	3.0
Polk	14	36	381	234	61	5,900	6.5
Pulaski	7	1,509	1,918	1,645	28	10,586	18.1
Putnam	6	35	113	113	43	2,619	4.3
Ralls	2	24	183	183	25	3,011	6.1
Randolph	23	88	396	299	21	8,484	4.7
Ray	35	32	199	165	4	6,441	3.1
Reynolds	1	5	139	139	20	2,770	5.0
Ripley	16	16	160	160	38	3,980	4.0
St. Charles	103	903	2,707	1,791	79	27,911	9.7
St. Clair	15	24	105	105	15	3,950	2.7
St. Francois	31	127	760	522	11	13,262	5.7
St. Louis	1,087	1,582	1,727	226	19	291,577	6.1
Ste. Genevieve	5	25	201	119	4	4,175	4.8
Saline	16	48	342	265	42	9,054	3.8
Schuyler	8	33	90	90	19	2,051	4.4
Scotland	6	32	56	56	6	2,256	2.5
Scott	32	131	516	440	13	11,399	4.5
Shannon	3	24	145	145	6	2,766	5.2
Shelby	5	49	145	145	22	3,267	4.4
Stoddard	20	61	268	183	22	9,534	2.8
Stone	15	36	324	324	89	4,554	7.1
Sullivan	3	34	120	120	43	3,342	3.6
Taney	11	131	560	560	47	5,558	10.1
Texas	13	79	380	380	20	6,931	5.5
Vernon	20	53	219	177	36	7,023	3.1
Warren	22	84	274	274	21	3,606	7.6
Washington	7	45	365	350	44	5,148	7.1
Wayne	17	28	184	184	11	4,118	4.5
Webster	8	57	381	331	39	5,600	6.8
Worth	3	8	39	39	6	1,426	2.7
Wright	11	28	215	186	36	5,401	4.0
St. Louis City	120	39	105	—	—	238,436	—

Appendix B

Rules and Regulations for Woodstock Rolling Estates

The following rules and regulations have been adopted by Owners and Management of Woodstock Rolling Estates.

1. Tenants shall avoid making or contributing to excessive noise.
2. The Owners and Management of Woodstock Rolling Estates shall not be liable for fire, theft, or damage of any kind to any trailer, car or other personal property belonging to any tenants living therein, or their guests; and the Owners and Management of said Trailer Park shall not be liable for any personal injuries to any person occupying such trailer or their guests while upon the premises known as Woodstock Rolling Estates.
3. The Owners and Management reserve the right of access onto all trailer lots or trailer sites at all times for the purpose of inspection and utility maintenance.
4. Trailers and lots, or trailer sites, shall be used only for living and dwelling purposes and no business or commercial activity shall be conducted on the premises without written consent of the Management.
5. Pets are allowed within Woodstock Rolling Estates under the following provisions:
 - a. All cats and dogs must have a valid rabies tag verified by the Management.
 - b. All dogs must be on a leash, in a fenced yard or tied.
 - c. Any dog running loose will be taken to the Humane Society. Any cat creating a disturbance will be taken to the Humane Society.
6. All new residents of Woodstock Rolling Estates shall be required to undershirt their trailer within sixty (60) days from date of occupancy, management reserves the right to reject or accept tenants selection of material.
7. All plants, trees, shrubs and walkways placed on a lot or site shall automatically become the property of the Owners and cannot be removed without the permission of the Owners or Management.
8. To Plant a tree on the premises, the tenant or resident shall first obtain the permission of the Owners or Management.
9. Each resident or tenant is required to mow, trim, edge, weed, and water his own lawn around the trailer and patio once a week. If said tenant or resident fails to do so, the Management and Owners reserve the right to perform the work, the cost of which shall be borne by the tenant. During inclement weather, the tenants will not be expected to accomplish the above.
 - a. Each tenant is required to keep his lot in neat order at all times, and no storage of any kind shall be permitted under any trailer unless neatly and properly screened from view and such screening approved by the Management.
 - b. The Management will mow, trim, edge, the public recreation areas in the park once a week and will provide routine maintenance to the swings, picnic tables and other facilities and equipment therein. Any tenant or tenant's children or guests found to be willfully misusing and/or damaging said facilities and equipment shall be responsible for the cost of repair and additional maintenance so incurred.
10. Temporary or permanent cabanas, porches, awnings, masonry work or fencing of any type must be approved by the Management prior to installation.
11. All connections by a tenant to utilities located in the park shall be done or performed in a manner approved by the Owners or Management; and after said connection has been completed, no tenant, resident, or guest of a tenant shall tamper in any way or manner with any utility connections.
12. The Management will provide off-street parking space for two cars on each lot for tenants to utilize. Tenants must assure that their visitors do not block other driveways when parking on the street.
13. No motor vehicle, including motorscooters and motorcycles, shall be driven within the park at speed limits in excess of 10 m.p.h.
14. No tenant, resident or guest shall leave any type of motor vehicle (other than that used regularly for transportation and business) either on a trailer lot or site or on the street within the park for a period longer than twenty-four (24) hours; and the Owners and Management reserve the right to have towed away any vehicle left standing for longer than twenty-four (24) hours, and the towing and storage costs shall be paid by the owner of the vehicle.
15. Only umbrella-type clotheslines shall be permitted within the park.
16. No television antenna shall be erected on any lot or site higher than four (4') feet above the trailer located on said lot or site.
17. All garbage, rubbish or trash shall be at all times kept in covered containers—plastic

or metal containers with lids.

18. No tenant or resident shall burn any trash or any other material without first obtaining the permission of the Management.
19. No trailer shall be permitted in the park with dimensions less than ten (10') feet width and (40') feet length, and oil or bottled gas are not allowed in Woodstock Rolling Estates.
20. In the event any taxing authority assesses any mobile home or any improvements erected by a tenant as part of the real estate, the tenant will refund or pay to the Owners or lessor the amount of the real estate tax generated by the increased assessment. The tenant shall pay said amount within five (5) days after receiving notice from the owner or lessor of said increased real estate tax.
21. Bicycles must have a light and a reflector if

they are going to be used after dark. Bicycles will not be allowed in the streets between the hours of 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. because of the traffic coming and going from Woodstock Rolling Estates. Bicycles may be ridden on the sidewalks at any time.

22. The Owners and Management reserve the right to add to or alter these rules and regulations as circumstances require. All tenants will receive a forty-eight (48) hour grace period to comply with any changes or alterations to the Rules and Regulations.

These Rules and Regulations have hereby been adopted by the Owners of Woodstock Rolling Estates this _____ day of _____, 19 ____, and constitute the Rules and Regulations referred to in the Lease Agreement with tenants leasing space in said park.

Woodstock Estates Trailer Site Lease

hereinafter referred to as "Lessor" does hereby lease to _____ hereinafter referred to as "Lessee" trailer site number _____ in the Woodstock Estates Trailer Park for a period commencing on the _____ day of _____, 19____ and terminating on the day of _____, 19____, and Lessee agrees to pay a monthly rental of \$ _____ per month, the first months's rent payable upon the execution of this lease, and subsequent monthly rental shall be due on the first day of each month and all rent shall be paid at Lessor's office in the Woodstock Estates Trailer Park.

THIS LEASE SHALL BE SUBJECT TO THE FOLLOWING CONDITIONS:

1. Lessee agrees not to assign, sublet or allow any other tenant or person to come in with him or under him except after having first obtained a written consent of Lessor.

2. It is the desire of the Lessor that said trailer park shall be free of tenants which make or cause disturbance or which may engage in activities detrimental to the welfare, peace of mind and health of all the tenants in said trailer park; and therefore, in order to assure the best possible living conditions for all persons living in said trailer park it is hereby agreed that if Lessor deems it desirable that Lessee move from said premises and said Lease shall be terminated that Lessor shall give to Lessee five (5) days' notice in writing deposited in the United States mail with postage prepaid that said lease is terminated, and Lessee shall deliver possession of said trailer site to Lessor within said five (5) day period, and this Lease shall then be terminated and it shall be at the sole discretion of Lessor, and Lessor shall have the sole right of determination of whether or not it is for the best interest of the people residing in said trailer park that this lease be terminated in the manner set out herein. In the event the Lessee desires to vacate said premises and terminate said Lease prior to the termination date of said Lease, the Lessee shall give notice of his intent to vacate said premises prior to the first day of the month in which he intends to vacate said premises, and with said notice he shall pay to Lessor the rent

due for said month, and Lessee shall vacate the said premises during the month following the month in which the notice is given.

3. In the event Lessee is in default of any payment of rent for five (5) days after the same is due, Lessee will at the request of Lessor quit and render to Lessor peaceful possession of the premises, but for this cause the obligation to pay rent herein specified shall not cease. No alteration in and to the premises shall be made by Lessee except on written consent of Lessor.

4. It is understood and agreed by the parties that Lessor has adopted a set of rules and regulations regarding the conduct of all tenants, lessees and guests while in the trailer park and regulating the use of all clubrooms, driveways and other common areas, including the parking areas, and that all of said rules and regulations are incorporated in this Lease by reference herein; and Lessee agrees to abide by all of said rules and regulations, and failure of Lessee fully to abide by all said rules and regulations shall be a breach of Lessee's covenants and conditions as contained in this Lease. The rules and regulations herein referred to are the rules and regulations in existence as of the date of this Lease, and any new rules or regulations or changes in existing rules and regulations made at any time by Lessor.

IN WITNESS WHEREOF, the parties have executed two (2) copies of this Lease, one to be retained by each party. Dated this _____ day of _____, 19_____.

Form No. 1

_____ 19 _____
I, We _____
hereby admit service on this date of a certified copy of an order of the Public Service Commission of Missouri, dated _____, in the matter of Case No. _____

the terms of which are accepted and will be obeyed.
SIGN HERE _____

Appendix C

Implementation Procedures Regarding Uniform Standards for Mobile Homes and Recreational Vehicles in Missouri

STATE OF MISSOURI PUBLIC SERVICE COMMISSION

At a Session of the Public Service Commission held at its office in Jefferson City on the 20th day of December, 1973.

CASE NO. 17,974

In the matter of adopting uniform systems for mobile homes and recreational vehicles.

GENERAL ORDER NO. 58

The Commission, in order to implement the provisions of Chapter 700 RSMo 1969, as amended by Laws 1973, H. B. 98 Sections 1 through 16, concludes that it should adopt American National Standards Institute standards identified as ANSI A119.1, 1973, relating to mobile homes and ANSI A119.2, 1972, relating to recreational vehicles, as its code for establishing uniform standards for mobile homes and recreational vehicles.

A copy of ANSI A119.1, 1973, relating to mobile homes, and ANSI A119.2, 1972, relating to recreational vehicles, are attached hereto and made a part hereof and are kept on file with the Commission.

It is, therefore,

ORDERED: 1. The standards code promulgated by the American National Standards Institute identified as ANSI A119.1, 1973, relating to mobile homes and ANSI A119.2, 1972, relating to recreational vehicles be, and are, hereby adopted by the Commission.

ORDERED: 2. That every manufacturer of mobile homes and recreational vehicles in the State of Missouri, and every dealer in mobile homes and recreational vehicles in the State of Missouri and all manufacturers of mobile homes and recreational

vehicles in other States desiring to ship same into Missouri for sale shall, within ten (10) days after the receipt of a certified copy of this General Order No. 58, notify the Commission whether the terms of this Order are accepted and will be obeyed.

ORDERED: 3. That this General Order No. 58 shall become effective on January 1, 1974, and a copy, duly certified by the Secretary of the Commission, shall be filed in the archives of the Commission, and that said copy so certified and filed shall be deemed the original hereof, and a certified copy hereof be filed in the office of the Secretary of State, and that a copy hereof be served upon each interested party.

BY THE COMMISSION

Wanda Tipton
Acting Secretary

(S E A L)

Mauzè, Chm., Clark, Fain,
Reine and Pierce, CC., Concur.

STATE OF MISSOURI OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file with this office and I do hereby certify the same to be a correct transcript therefrom and of the whole thereof.

Witness my hand and seal of the Public Service Commission, at Jefferson City, this _____ day of _____, 1973.

Acting Secretary

December 17, 1973

TO: Mobile Home and Recreational Vehicle Industries

FROM: Missouri Public Service Commission

UNIFORM STANDARDS CODE FOR MOBILE HOMES AND RECREATIONAL VEHICLES

The following information is submitted to you for implementation of the Uniform Standards Code for Mobile Homes and Recreational Vehicles contained in General Order No. 58. General Order No. 58 establishes the Standards Code promulgated by American National Standards Institute and identified as ANSI A119.1, relating to mobile homes and, ANSI A119.2, relating to recreational vehicles, and revisions thereto, as approved by this Commission.

By law the Missouri Public Service Commission will be the enforcing agency of the State. A Division of Mobile Homes and Recreational Vehicles has been established by the Commission with Douglas R. Busby as Director to submit proposed rules and regulations and administer the provisions of this program.

It is realized from a practical viewpoint that all provisions of this directive cannot be implemented at once. It is the goal of this Commission that effective January 1, 1974 units sold in Missouri will meet the standards which have been adopted and bear a Missouri Seal as evidence of ANSI standards compliance.

Implementation of the requirements of General Order No. 58 is anticipated in two phases. Phase One will consist of affixing the fifteen-digit serial

numbers to all units manufactured in Missouri. Also, in this first phase will be a self-certification by manufacturers and dealers of units either manufactured or in dealer inventory of those units manufactured after initial implementation date of this General Order, insuring units are in compliance with ANSI A119.1 or ANSI A119.2, 1972, effective January 1, 1974. This self-certification procedure is temporary. The self-certification clause has been implemented to insure that there will be inconvenience to our Missouri manufacturers and dealers.

Affixing the Missouri certification Seals as applies to self-certification will be effective January 1, 1974. Manufacturers will apply Seals of certification retroactive to those units manufactured after January 1, 1974.

Phase Two will consist of preparing and publishing Missouri Uniform Standards Code, establishing inspective criteria, and preparing out-of-state reciprocity agreements. The revenue received from the sale of the Seals is to underwrite the cost related to administering these rules and regulations.

I solicit your full cooperation and indulgence in the enforcement of the Missouri Uniform Standards Code.

Attached are two supplemental information procedures implementing this General Order. Read them carefully as they cover in detail our initial implementation instructions to this General Order No. 58.

If you have any questions concerning implementation of this initial phase, please write to Director, Division of Mobile Homes and Recreational Vehicles, Jefferson State Office Building, Jefferson City, Missouri 65101.

Very truly yours,

James F. Mauze
Chairman

SUPPLEMENT NO. 1

TO: Missouri Mobile Home and recreational Vehicle Manufacturers

FROM: Missouri Public Service Commission
Division of Mobile Homes and Recreational Vehicles

DATE: December 17, 1973

MISSOURI SERIAL NUMBERING

1. The following instructions implement the fifteen-digit serial number to each manufacturer and its application to units as required by the Commission's General Order No. 58.

2. The Section of the law which provides for the above requirements is quoted as follows:

Section 10. "From and after January 1, 1974, the manufacturer shall cause a serial number to be stamped on the front cross member of the left-hand side so that it may be easily read. It may not contain more than fifteen (15) digits. Any multiple units shall contain the same serial number with letters of the alphabet designating that each is a separate unit. Starting with "A" each additional unit shall be in alphabetical order. Letters shall be stamped at the end of the numbers."

3. The regulations as promulgated by the Commission which regulate the manufacturer's serial number are as follows:

The manufacturer shall stamp a serial number on each unit produced in this State. The serial number shall:

- a. Be not less than three-eighths of an inch high.
- b. Be conveniently visible and clearly legible.
- c. Be stamped on the metal chassis, or if none, on a section of the permanent frame.
- d. Be located on mobile home on the front cross frame or near the tow bar.
- e. Be located on recreational vehicles at or near the lower left front corner of the unit.

f. Consist of not more than fifteen characters. Serial numbers shall include manufacturer's origin, date of manufacture, and the sequential number indicating order of production, commonly known as serial number. Each manufacturer will maintain records, subject to audit, which will reflect sequential numbers and dealer who purchased each unit.

g. The same fifteen-digit numbers on each section of a multiple-section unit shall be followed by a letter "A" on the first section and continue in alphabetical order for each succeeding section of the unit.

h. Not have any character stamped over, crossed out, ground off, welded over, or otherwise altered or corrected. Errors shall be corrected by crossing out the entire number (at the point discovered) and by providing a correct substitute that is clear, complete and unblemished.

4. Your attention is especially directed to Item c above. The serial number shall be stamped on part of the unit itself. It shall not be stamped on a metal tag and then fastened to the unit.

5. There need be *no* relationship between the frame serial number and the seal number.

6. Directly under the manufacturer's fifteen-digit serial number the letters "MOM" or "MOR" will be stamped, and the serial number of the Missouri Certification Seal which was affixed to the unit at the manufacturer's plant will be stamped.

"MOM" signifies "Missouri Mobile Home" and "MOR" signifies "Missouri Recreational Vehicle".

If any questions arise, please write Division of Mobile Homes and Recreational Vehicles, Missouri Public Service Commission, Jefferson State Building, Jefferson City, Missouri 65101, or telephone 314 751-2557.

Douglas R. Busby
Director, MH/RV

SUPPLEMENT NO. 2

TO: Mobile Home and Recreational Vehicle
Manufacturers and Dealers

FROM: Missouri Public Service Commission
Division of Mobile Homes and Recreational
Vehicles

DATE: December 17, 1973

**SEALS
MISSOURI CERTIFICATION OF
MOBILE HOMES AND RECREATIONAL VEHICLES**

1. The following information is forwarded for the implementation of the Missouri Uniform Standards for Mobile Homes and Recreational Vehicles providing for inspection and fees with penalty provision.
2. All manufacturers of mobile homes or recreational vehicles will "self-certify" those units produced after January 1, 1974, insuring that all construction systems meet the standards promulgated by the American National Standards Institute and identified as ANSI A119.1, 1972, relating to mobile homes and, ANSI A119.2, relating to recreational vehicles, and all revisions thereto.
3. All dealers will "self-certify" those mobile homes or recreational vehicles manufactured in Missouri or in another state after January 1, 1974. Mobile homes or recreational vehicles manufactured in another state may not be accepted by the dealers 30 days after date of implementation of this General Order, or until out-of-state manufacturers meet the requirements of the ANSI standards and affix the Missouri Certification Seal prior to shipment into Missouri. (Note to Dealers) If you are in doubt about out-of-state mobile homes or recreational vehicle standards, a letter or teletype communication listing make, model, and serial number from the manufacturer indicating certification to ANSI standards will suffice for those units presently in your inventory. This communication must be retained in your file. This will be a one-time only approval to reduce any

hardship on dealer-possessed inventory. Your cooperation is solicited for initial implementation of this program.

4. All mobile homes and recreational vehicles manufactured after prescribed date of implementation by the Missouri Public Service Commission will have a state identification seal visibly located on the section housing the primary entrance door.
5. Seal Acquisition. Application for seals shall be made to the Director upon forms provided by him for such purpose. Each application shall show on its face that the applicant agrees and understands that:
 - a. Seals issued to the applicant shall be affixed to only those units which meet or exceed the requirements of the Missouri Uniform Standards.
 - b. The applicant has provided or agreed to accept a method approved by the Commission to evidence his present and continuing compliance with this Act.
 - c. The applicant shall permit inspection of all units and of the premises and facilities of the applicant as may be required by the Commission to insure compliance with the Act.
 - d. The applicant shall return seals which are recalled upon notification in writing by the Director.
 - e. The applicant has fulfilled all other conditions and requirements of the Act and those regulations for the acquisition and use of seals.
6. Seals, issuance. Seals shall be issued by the Commission by one of the following methods to an applicant who has fulfilled the conditions in paragraph 5 above:
 - a. By registered mail sent to the applicant's business address.
 - b. By an authorized representative in person at the applicant's address. The authorized representative shall obtain an acknowledgment signed by the applicant upon delivery of the seals.
 - c. By an applicant in person at the office of the Director. The Director shall obtain an acknowledgment signed by the applicant upon delivery of the seals.
7. Seals, control. Seals will be numerically con-

trolled by the Commission, Mobile Homes and Recreational Vehicles Division, Missouri Public Service Commission, to each manufacturer.

Two forms will be provided manufacturer; one to remain with unit titled Purchaser's Certificate of Compliance and, the second, Manufacturer's Certification of Compliance. This form is self-explanatory and will be substantiated monthly to the Director of MH/RV, Missouri Public Service Commission. These forms will accompany certification seals upon purchase to manufacturers for compliance.

Lost, mutilated, or unserviceable certification seals will be annotated on the Manufacturer's Certificate of Compliance Form Monthly Report and seal will be replaced. Replacement seal cost will be \$4.00. Original seal cost will not be returned if original seal is replaced. Purchase price of replacement seal will accompany Monthly Report Form.

8. Upon completion of this initial implementation phase of General Order No. 58, that is, affixing manufacturer's unit serial numbers, manufacturer's self-certification of units, dealer self-certification of those units manufactured after implementation date, the second phase will be implemented.

It is realized from a practical viewpoint that all provisions of this directive cannot be implemented at once. It is the goal of the Commission that effective January 1, 1974 units sold in Missouri will meet the standards which have been adopted and will bear a Missouri seal as evidence of ANSI standards compliance.

9. If all mobile home and recreational vehicle dealers would expedite sending out-of-state manufactured units manufacturer's name and address, this office will immediately contact those manufacturers and assist them in their compliance with the Missouri Uniform Standards to insure there will be no inconvenience to our Missouri dealers.
10. The initial sale price of the Missouri certification seal will be \$8.00 for both in-state and out-state manufacturers.
11. Form for the purchase of certification seals are enclosed. Checks or money orders will be made payable to Director of Revenue, State of Missouri. Payment for seals must accompany purchase form.
12. Out-of-state manufacturers will be required to purchase Missouri seals of certification after their manufacturing facilities and mobile home or recreational vehicle standards have been approved by the Division of Mobile Homes and Recreational Vehicles, and by the Director, and until such time as reciprocity agreements between states have been established concerning the manufacture of mobile homes and recreational vehicles which meet or exceed the compliance standards of ANSI A119.1 or ANSI A119.2, dated 1972, and revisions thereto.

Douglas R. Busby, Director
Mobile Homes and Recreational Vehicles

STATE OF MISSOURI
PURCHASERS CERTIFICATE OF COMPLIANCE

NAME OF MANUFACTURER

CITY STATE ZIP CODE

I hereby certify that the Mobile Home/Recreational Vehicle as described here-
on has been constructed in compliance with the 1974 Missouri Uniform Stan-
dards Code and does comply with all provisions of the act and the regulations
promulgated thereunder.

Serial No. _____ Date MFG _____ Model _____
Mo. Seal No. _____ Width _____ Length _____
Date _____
Person authorized to certify this unit

This certificate must remain with the unit
Form MHRV-3

MISSOURI PUBLIC SERVICE COMMISSION

APPLICATION FOR SEALS CERTIFYING COMPLIANCE WITH
MOBILE HOMES AND RECREATIONAL VEHICLE STANDARDS

TO: Director
Mobile Homes and Recreational Vehicles Division
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65101 Date: _____

Applicant: _____
Street: _____
City: _____ State _____ Zip Code _____

Applicant is a Manufacturer _____ Dealer _____ (Check One)
of mobile homes _____ recreational vehicles _____ (Check One).

Applicant hereby applies for the issuance of _____ (number) mobile home and
recreational vehicle seals as required by the provisions of House Bill 98 as passed by the
77th General Assembly. The fee for such seals is \$8.00 each. A check or money order pay-
able to Director of Revenue is enclosed in the amount of \$ _____.

I, the undersigned, under penalty for false statement, do hereby certify that I am an owner
or officer of Applicant and the above information is true and correct and I hereby certify
the seals herein applied for will be affixed only to mobile homes or recreational vehicles
which comply fully with the standards code of the American National Standards Institute.

Signature _____
Title _____

NOTICE: The standards code of the American National Standards Institute is identified as
ANSI 119.1, 1972, for mobile homes and ANSI 119.2, 1972, for recreational
vehicles.

Form MHRV-1

Serial Numbers: (This Report) From _____ To _____

STATE OF MISSOURI
CERTIFICATES OF COMPLIANCE

NAME OF MANUFACTURER

MAILING ADDRESS

CITY STATE ZIP CODE

I hereby certify that the mobile homes as described hereon have been constructed in compliance with the Uniform Standards Code for Factory Manufactured Movable Homes and does comply with all provisions of the Act and the Rules and Regulations promulgated thereunder.

Line NO	Serial Number	Decal Number	Date MFG.	Model	Length	Width
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						

This form, completed in duplicate, must be used in reporting and certifying units to the Division of Mobile Homes and Recreational Vehicles. The original is to be sent to the Director of Mobile Homes and Recreational Vehicles and the copy may be retained by the manufacturer. This form must be filed by the first day of the month.

Date _____, 19____ By _____
(Person Authorized)

Form MHRV-2

Mobile Home
Recreational Vehicle
Missouri Public Service Commission
Jefferson Building
Jefferson City, Missouri 65101

The Division of Health of Missouri

REGULATIONS RELATING TO MINIMUM STANDARDS FOR MOBILE HOME TIE-DOWN SYSTEMS

SECTION I. DEFINITIONS

For the purpose of these regulations, the terms used are defined as follows:

1. **Anchor Tie**—a restraining device used to secure a mobile home against overturning or sliding.
2. **Vertical Anchor Tie**—an anchor tie designed primarily to resist overturning by applying a force to the mobile home in a direction no more than 15° from the vertical.
3. **Diagonal Anchor Tie**—an anchor tie designed primarily to resist sliding by applying a force to the mobile home in a direction more than 60° from the vertical.
4. **Tie Down**—two (2) anchors on opposite sides of the mobile home coach, each of which is attached to the frame of the mobile home via a suitable cable or strap and/or to the coach via either an integral strap attached during manufacturing or an external strap or cable passing over the coach and connecting the two anchors.
5. **Tie-Down System**—a combination of tie downs that will, when properly installed, resist overturning and lateral movement of the mobile home in specified sustained wind velocities.

SECTION II. TIE DOWNS

1. All mobile homes shall have tie downs spaced as evenly as practical with the piers or blocks. End tie downs shall be no more than 5 feet from the ends of the mobile home.
2. In addition to the above-mentioned tie downs, tie downs shall also pass over-the-top at the stud and rafter location near each end of the mobile home. These over-the-top tie downs may be installed under the skin at the factory or may be installed over the skin at the mobile home site. They may use the same anchors as the end frame tie downs.
3. All tie downs shall be fastened to ground anchors and be drawn tight with ½-inch or larger galvanized, drop-forged turnbuckles or other equivalent tensioning device. Turnbuckles shall be ended with jaws or forged or welded eyes. Turnbuckles with hook ends are not approved.
4. When cable is used for ties, it shall be of either galvanized steel or stainless steel. It shall be ⅝-inch diameter or larger. (7 x 7 — 7 strands of 7 wires each) steel cable, or ¼-inch diameter or larger (7 x 19 — 7 strands of 19 wires each) "aircraft" cable.

5. All cable ends shall be secured with at least two U-bolt type cable clamps or other equivalent fastening device.
6. When flat steel strapping is used, it must equal or exceed Federal Specification QQ-S-781, i.e. 1¼-inch x .035-inch, Type 1, Class B, Grade 1. Zinc coating must be a minimum of 0.30 ounces per square foot of surface. Any other material shall be at least equal to the above specifications in tensile strength and weather resistance.
7. Steel bands used for ties must terminate with a D-ring, bolt or other device that will not cause distortion of the band. Tensioning device should be supplied.
8. Sharp edges of the mobile home that would tend to cut the cable or strap must be protected by a thimble or other device that will prevent such cutting.
9. Connection of a cable frame tie-down to the I-beam should be by a 5/8-inch drop forged closed eye, bolted through a hole drilled through the beam. A washer, or equivalent, should be used so that the beam is sufficiently fishplated around the hole. If steel strapping is used, it may be secured around the I-beam using an appropriate connecting device. Care should be exercised to insure that minimum bending radius is adhered to so that the breaking strength of the strapping is not reduced.
10. Other connectors, straps and cables of equivalent holding power, permanence and resistance to deformation are acceptable.

SECTION III. ANCHORS

1. Ground anchors should be spaced evenly along the length of the home. They should also be situated immediately below the outer wall so as to also accommodate over-the-top tie downs if this placement allows for sufficient angle for the anchor-to-frame connection.
2. Anchor rods shall be of 5/8-inch minimum diameter steel with a forged eye, welded eye, or approved tensioning head at the top.
3. When auger anchors are used, the augers shall be sunk to a depth of at least 4 feet.
4. When arrowhead anchors are used, the arrowheads shall be sunk to a depth of at least 4 feet.
5. When dead man anchors are used, the bottom of the rod shall be hooked into the concrete. Rods ends bent into hooks shall have a maximum inside bending radius of 3/8-inch and the hook shall be at least 4 inches in length. Dead

man anchors shall have a minimum vertical dimension of 2 feet and a diameter of at least 6 inches. They shall be sunk to a depth of at least 5 feet.

6. Anchors to reinforced concrete slabs supporting the mobile home must be of strength comparable to above.

SECTION IV. APPROVAL FOR SALE OR INSTALLATION

To secure approval of a product for sale, each anchor and tie-down system manufacturer shall submit to the Division of Health of the State of Missouri the following documents:

1. Detailed plans and specifications of each anchor model and tie-down showing model identification number, pertinent dimensions, materials, and method of securing ties. Each drawing shall bear the seal of a registered Professional Engineer attesting that the drawing accurately describes the anchor and tie-down as produced for sale.
2. Reports on field loading and destruction testing of each anchor model. Test reports shall bear the seal of the registered Professional Engineer in responsible charge of the testing and the following information:
 - a. Manufacturer and model number of anchor tested.
 - b. Date, time and location of testing and date of report.
 - c. The type of test performed (field loading or destructive), method and depth of installation, and test method used.
 - d. Soil type at test site and load-deflection data for field loading tests. Field loading tests must be performed in soil of each type for which the anchor is applicable. The soil types recognized for this purpose are:
 - (1) Sound, hard rock.

- (2) Very dense and/or cemented sands, coarse gravel and cobbles, preloaded silts and clays.
 - (3) Medium dense coarse sands, sandy gravels, very stiff silts and clays.
 - (4) Loose to medium dense sands, firm to stiff clays and silts, alluvium fill.
- e. Ultimate load and mode of failure (including location) for destruction tests.

3. List of proposed registered holding strengths for the various soil types. The registered holding strength for a particular soil type may not exceed either the lowest maximum load at which the anchor model experienced less than 2 inches of vertical deflection in that soil type, or 2/3 of the lowest maximum load which could be applied to the anchor in that soil type. In addition, the ultimate loads of all samples in the destruction tests must be at least twice the anchor model's highest registered holding strength.

SECTION V. MINIMUM TIE-DOWN SYSTEM

1. The number of tie-down components, including the anchor system, each with a registered holding strength of 4800 pounds, shown in the following table, shall constitute a tie-down system for a mobile home with indicated dimensions. A system designed to withstand a 70 mile per hour wind velocity shall be a minimum approved system.
2. The required number of tie-down components installed in soils of lower holding strength shall be increased to provide the equivalent total pull. Lower holding strengths shall be determined as indicated in Section IV. 3.
3. Mobile home tie-down systems exceeding minimum standards shall be labeled to show protection against the designed minimum wind velocity.

Wind Velocity m.p.h.	10- and 12- ft. wide mobile homes				12- and 14-ft. wide mobile homes	
	30 to 50 ft. long		50 to 60 ft. long		60 to 70 ft. long	
	No. of Diagonal Ties	No. of Vertical Ties	No. of Diagonal Ties	No. of Vertical Ties	No. of Diagonal Ties	No. of Vertical Ties
70	3	2	4	2	4	2
80	4	3	5	3	5	3
90	5	4	6	4	7	4
100	6	4	7	5	8	6
110	7	6	9	6	10	7

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