

The Mobile Home Task Force Report to the General Assembly

February 8th, 2024

In Vermont

(roughly)

20,000 Mobile Homes

7,000 in 240 Mobile Home Parks

13,000 outside parks

5.98% of Total Housing Stock



A fresh look at mobile homes and mobile home parks and challenges facing Vermont

- Affordability
- Labor
- Climate Change
- Environmental Justice

A Fresh Look

- Affordability
- Labor
- Climate Change
- Environmental Justice

Purchase Price

Site-Built: very roughly \$350 / sq. ft.

1000 sq. ft. = 20 ft by 50 ft

1000 sq. ft. = \$350,000

Mobile Home:

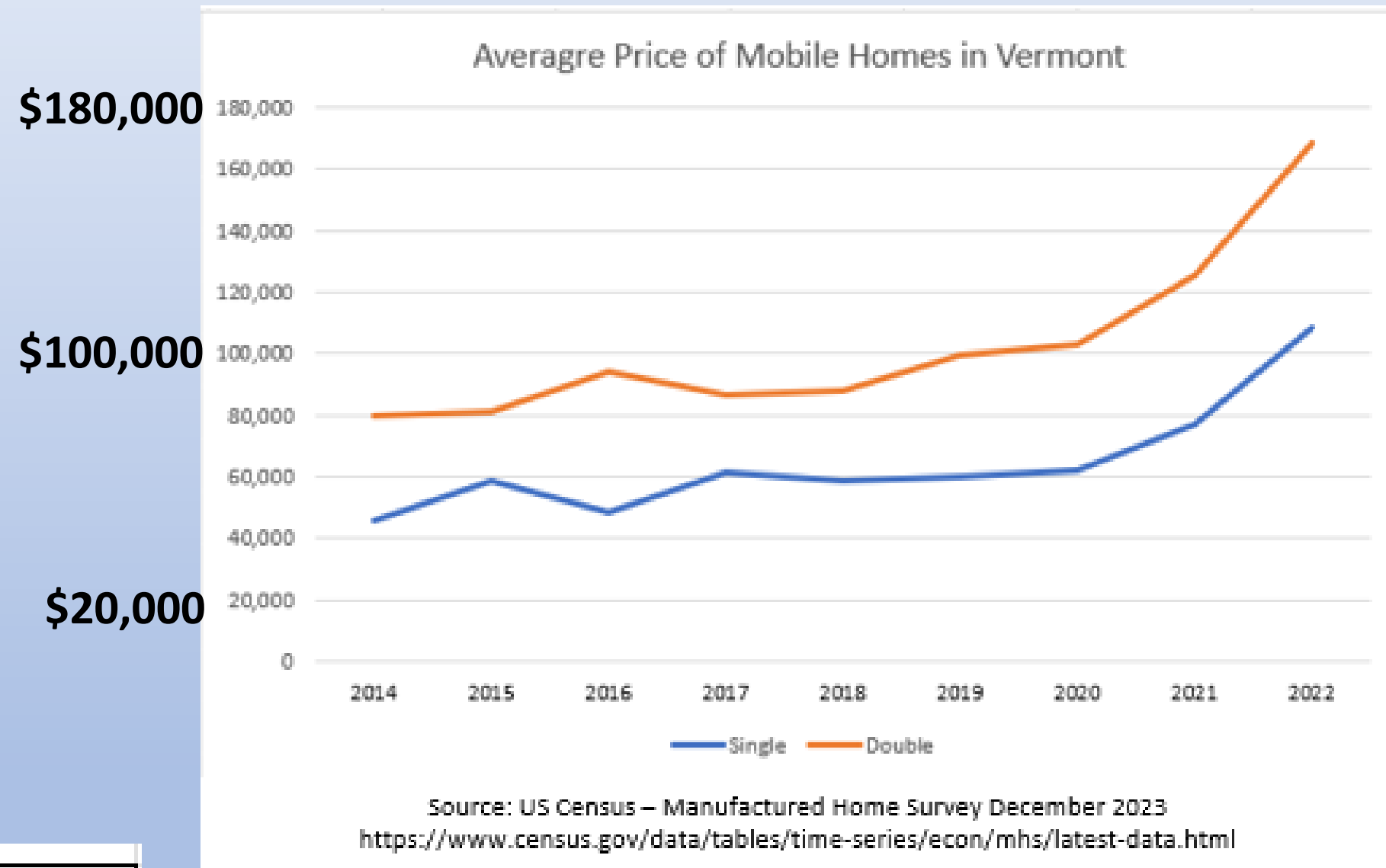
13.5 ft X 70 ft 3-bedroom, 2 bath ~ 1000 sq. ft

\$150,000 (not installed), \$150 / sq. ft.

A Fresh Look

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Price Changes



	Single	Double
2021	24.32	21.30
2022	40.67	34.48

Percent Price Increase

A Fresh Look

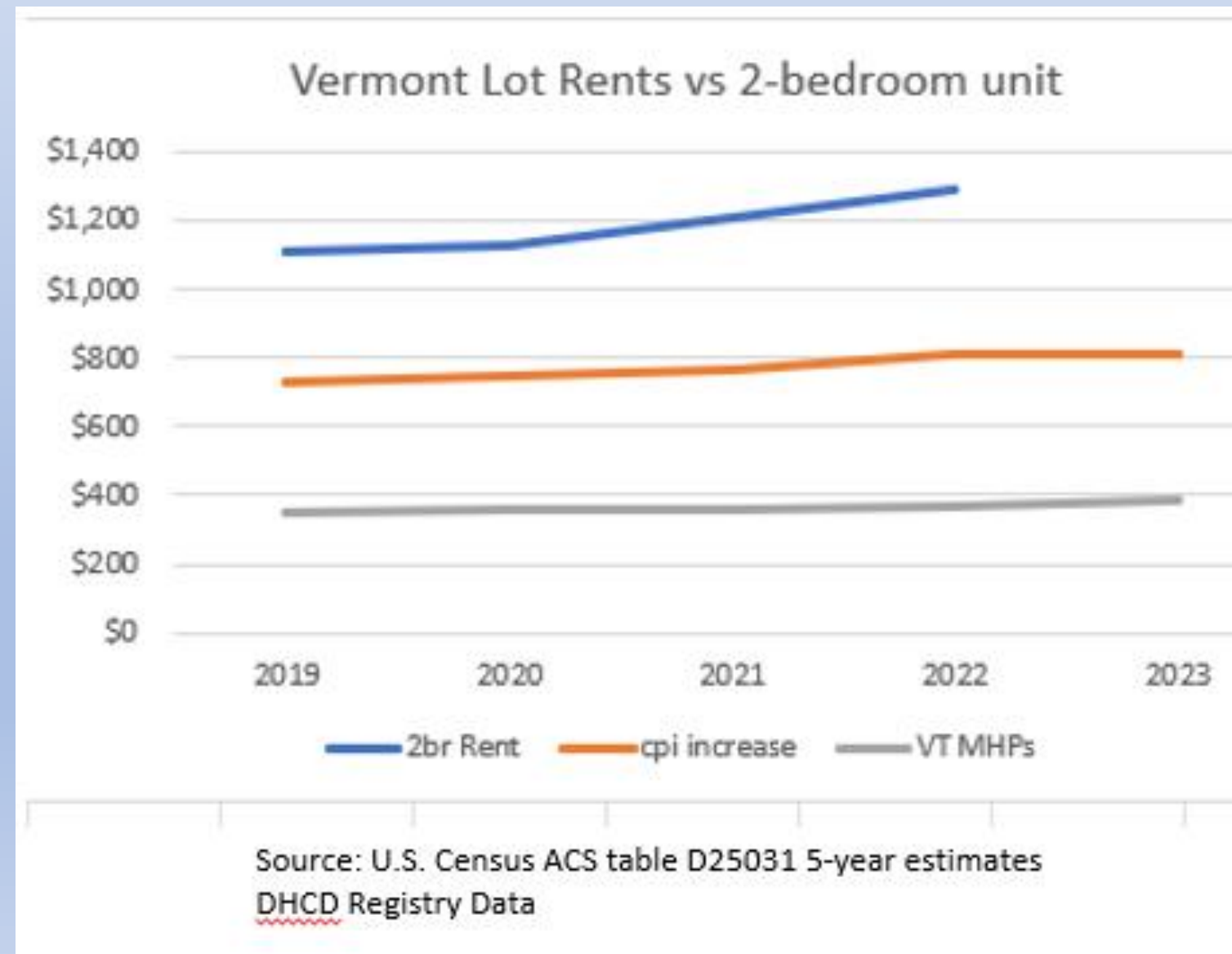
- Affordability
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MHP Lot Rents

Median Lot Rent in Vermont Mobile Home Parks				
2019	2020	2021	2022	2023
\$347	\$355	\$360	\$370	\$390

Range from \$125 to \$590 per month

Rent increases are regulated by Vermont law.



A Fresh Look

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Site-Built vs. Factory



- **Climate controlled**
 - Material and people
- Centralized – travel
- Labor
 - Training and supervision
 - Availability
 - Cost
- Climate – gas, waste
- Environmental Justice - Location

A Fresh Look

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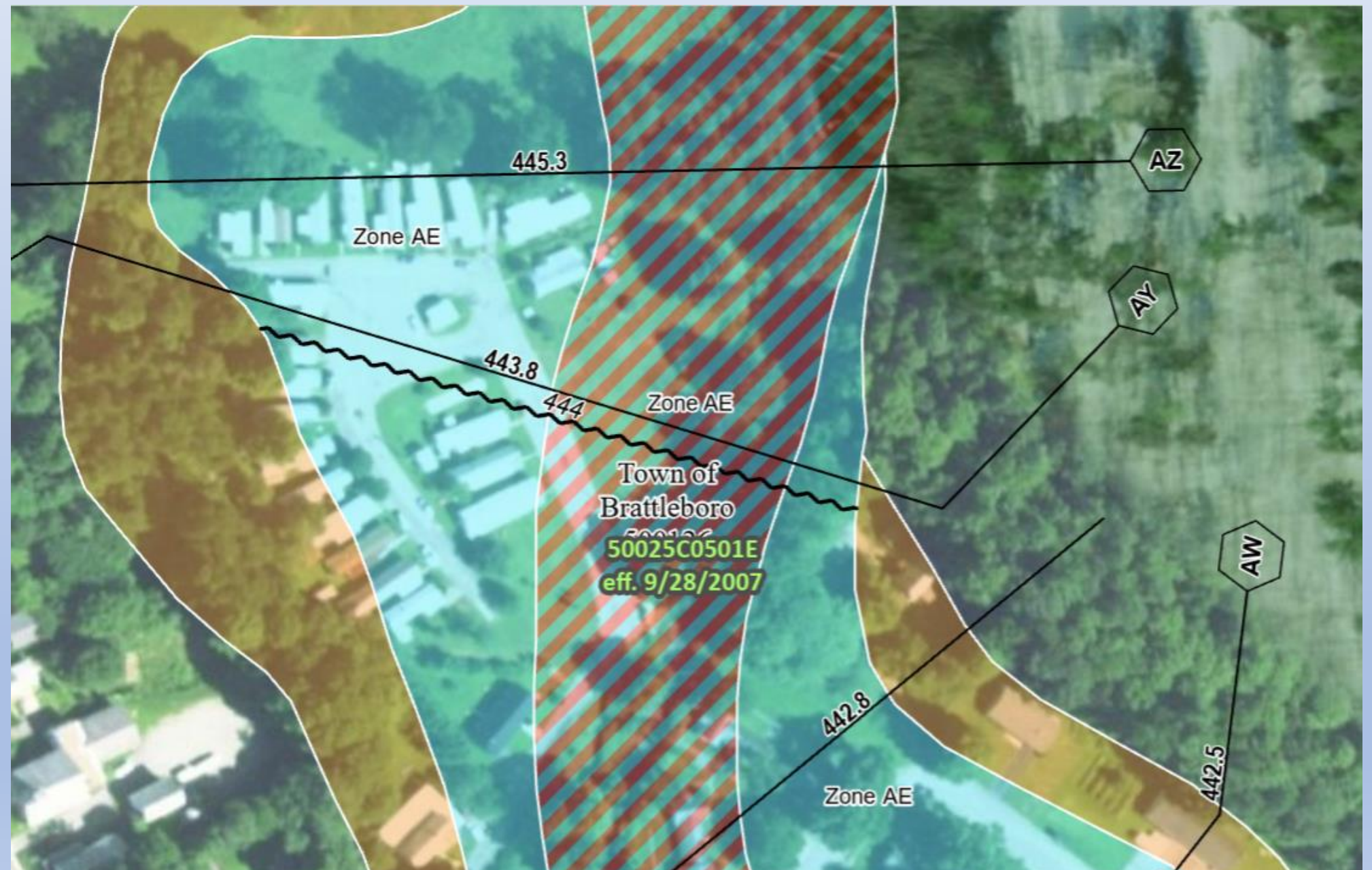
Photo from VtDigger article by Carly Berlin Sept. 29th, 2023

Mobile Homes are more likely to be destroyed by weather events than are other housing units.

A Fresh Look

- Affordability
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CVOEO and UVM in 2019 found that 40% of Vermont's mobile homes were in flood hazard areas.



A Fresh Look

- Affordability
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Act 154 of 2022 contains Vermont's Environmental Justice policy. It defines Environmental Justice.

Environmental Justice requires providing a proportional amount of resources for community revitalization, ecological restoration, resilience planning, and a just recovery to communities most affected by environmental burdens and natural disasters.

That policy must be applied, by law, when developing, resourcing, and implementing programs to address the state's housing and climate resilience needs.

A Fresh Look

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Park Residents

Same socioeconomic challenges of any lower-income neighborhood. Demographics lean to:

- Lower Income
- Lower education levels
- Older
- More likely to have disabilities

May change as more people look to mobile homes for affordable housing.

Climate Impact

More likely to be in a flood hazard area

Poorer infrastructure to handle climate events

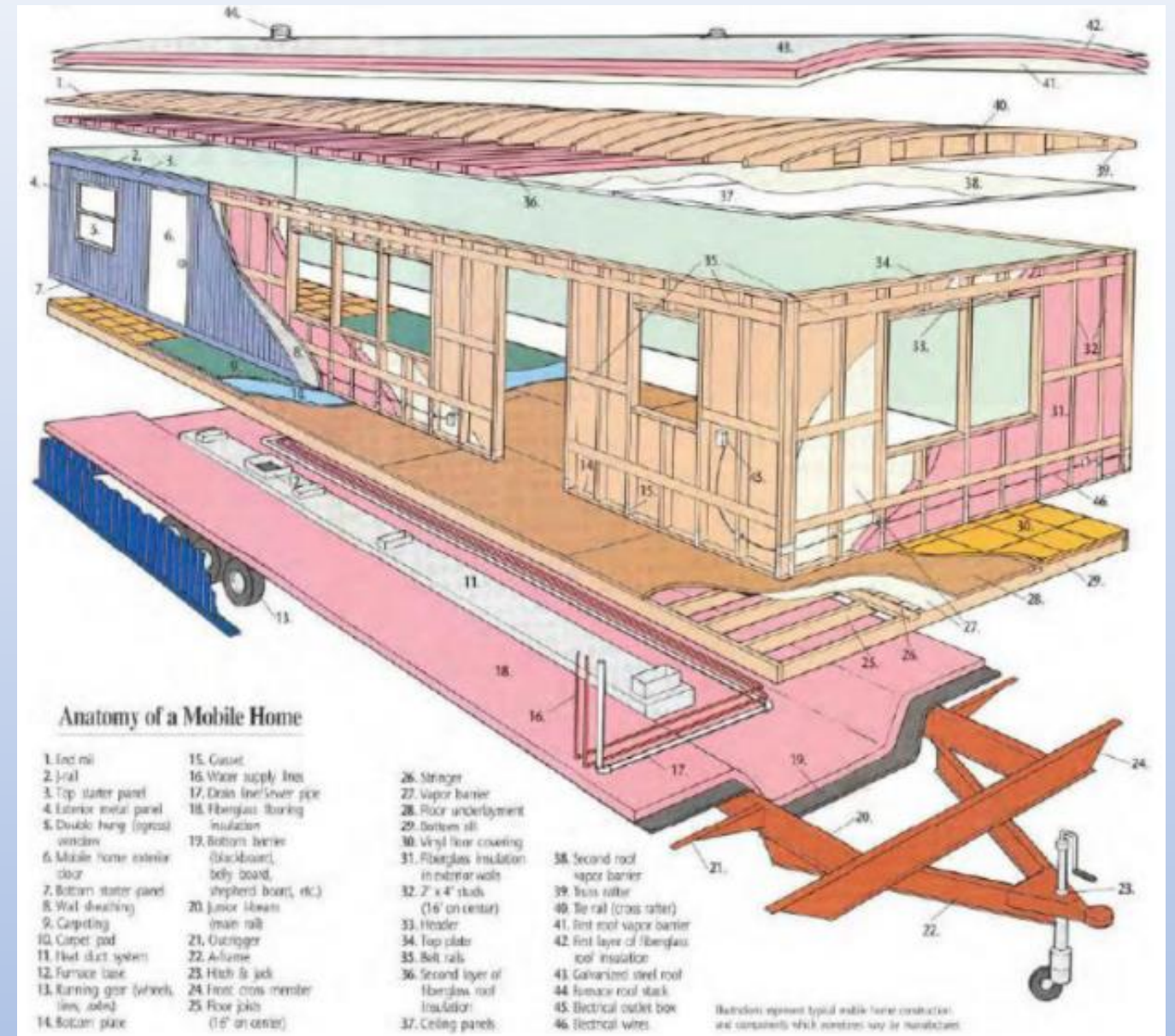
More severe impact on material and people's lives.

What is a Mobile Home?

Mobile Home vs.
Manufactured Home

Vermont and federal Housing and Urban Development (HUD)

- One or more transportable sections mounted on a permanent steel chassis.
- Designed to be used as a dwelling without a permanent foundation when connected to utilities.
- No on-site interior wiring or plumbing needed.



HUD Specific

- Built in a factory under controlled conditions and to specific safety and quality standards.
- Must comply with the Federal Manufactured Home Construction and Safety Standards (HUD Code)

Regulating Mobile Homes

United States Codes

TITLE 42—THE PUBLIC HEALTH AND WELFARE

§ 5401. Findings and purposes

(a) Findings

Congress finds that—

(1) manufactured housing plays a vital role in meeting the housing needs of the Nation; and

(2) manufactured homes provide a significant resource for affordable homeownership and rental housing accessible to all Americans.

(b) Purposes

The purposes of this chapter are—

(1) to protect the quality, durability, safety, and affordability of manufactured homes;

(2) to facilitate the availability of affordable manufactured homes and to increase homeownership for all Americans;

(3) to provide for the establishment of practical, uniform, and, to the extent possible, performance-based Federal construction standards for manufactured homes;

Mobile homes are:

- **Mobile**
- **Move across state lines**
- **Regulated by the federal government**

Regulation includes:

- **Design**
- **Production**
- **Quality control**
- **Certification**
- **Installation**

And mobile homes must adhere to HUD health and safety standards.

And they must be affordable

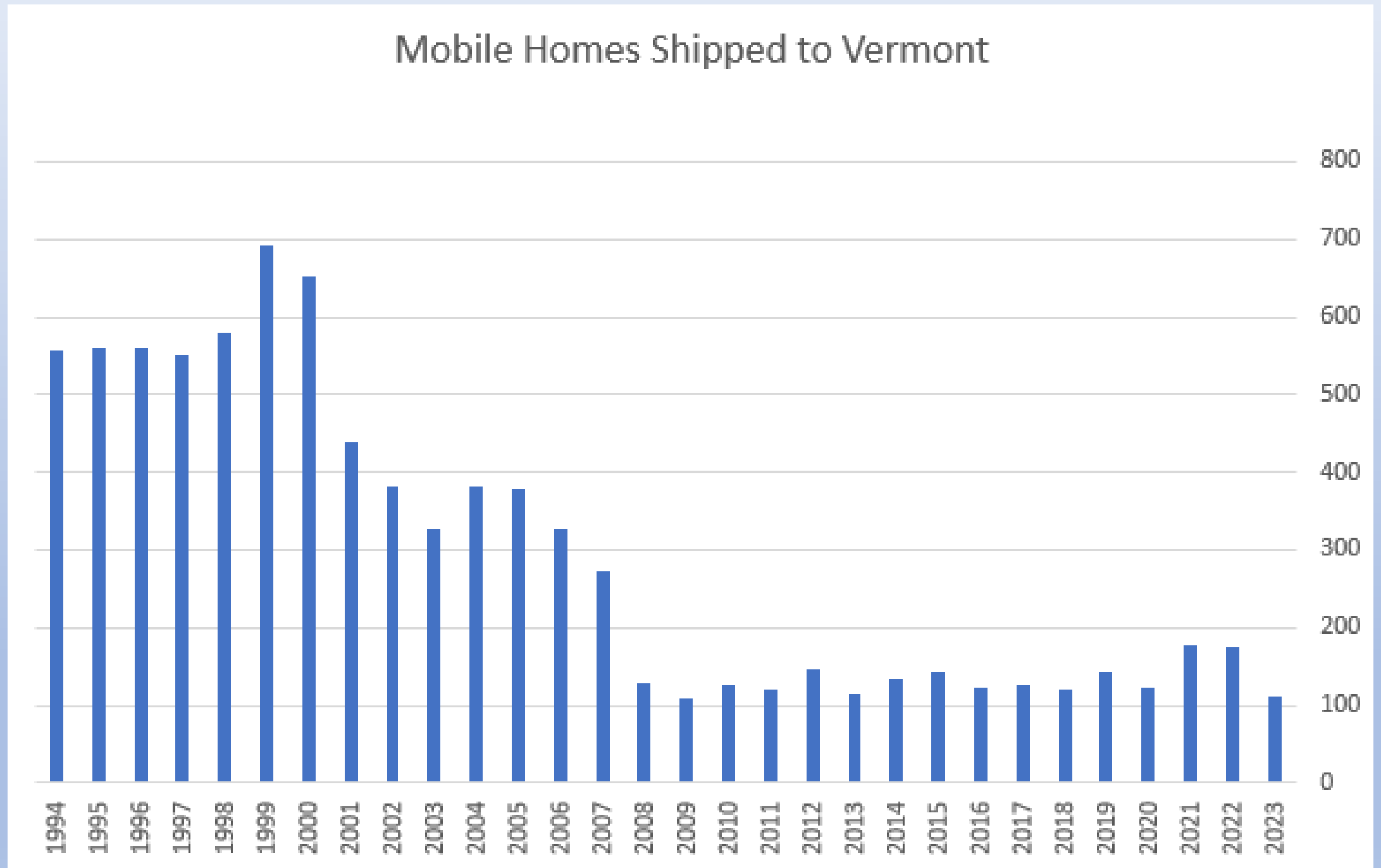
HUD Standards (codes) are Performance Based, while most building codes are Prescriptive.

Vermont's Mobile Homes

How Old are Vermont's Mobile Homes?

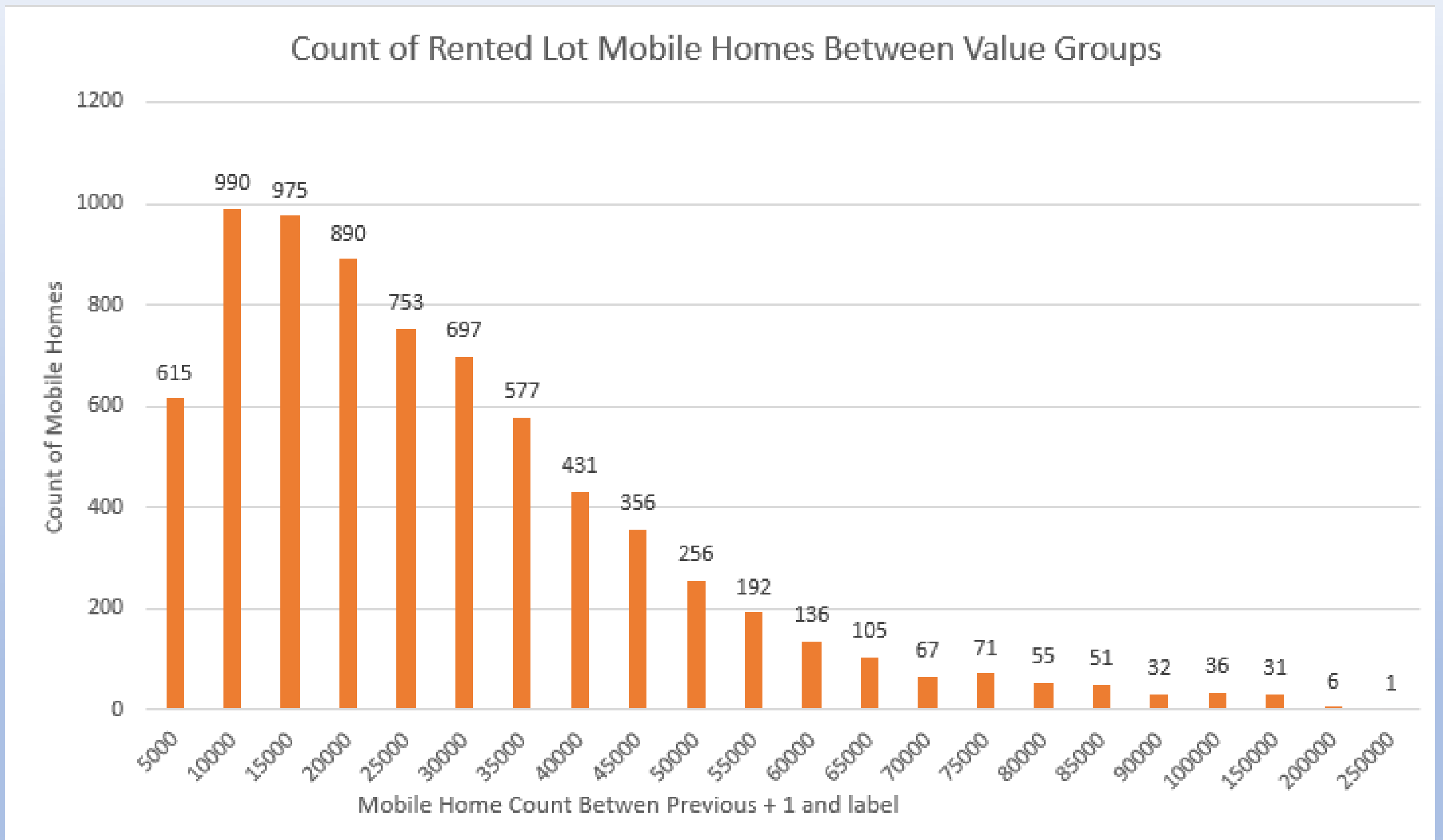
4,635 new homes shipped to VT since 2000.

23.18% current stock.



Charts shows 8,790 of the 20,000 – 43%.
60% of the MHs in VT are over 30 years old.

Vermont's Mobile Homes



The grand list value of Vermont's Mobile Homes on rented lots?

The Mobile Home Factory



7 Homes a day

Could produce 1,800 homes a year

The result is a fairly specialized product that must be properly maintained.

Vermont does not have the labor force with the skills to maintain mobile homes, particularly older models.

Purchasing a Mobile Home

Real Estate vs. Personal Property

Landed vs. Unlanded

Mortgage Loan vs. “Chattel” Loan



- Lower Rates
- Longer Terms
- Can be sold on secondary market
- Can be insured by FHA

Lenders have flexibility in deciding type of loan, rates, and terms.

It's all about perceived risk

Title 9: Commerce And Trade

Chapter 72: Mobile Homes

§ 2601. Definitions

(c) A mobile home that was financed as residential real estate shall be defined as residential real estate.

§ 2603. Financing of mobile homes; creditors' remedies; retail installment contract disclosure

(b) A mobile home that is or is intended to be permanently sited for continuous residential occupancy by the owner on land that is:

- (1) Owned by the owner of the mobile home **shall** be financed as residential real estate.
- (2) Leased by the owner of the mobile home **may** be financed as residential real estate.

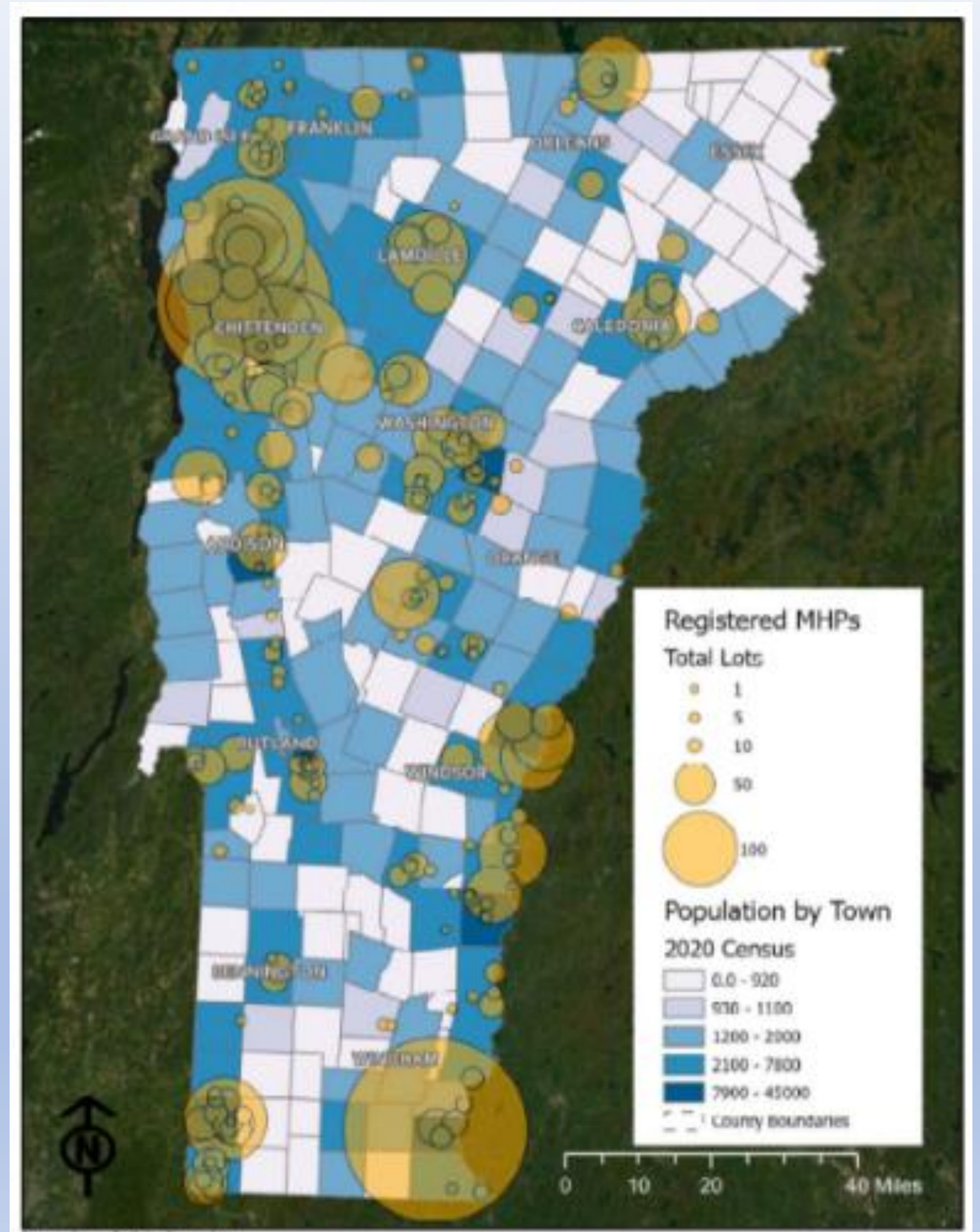
Vermont's Mobile Home Parks

Roughly 240 parks with a total of 7,000 lots.

By statute, more than 2 homes on common land.

Infrastructure Considerations

- **Age**
- **Size**
- **Ownership**

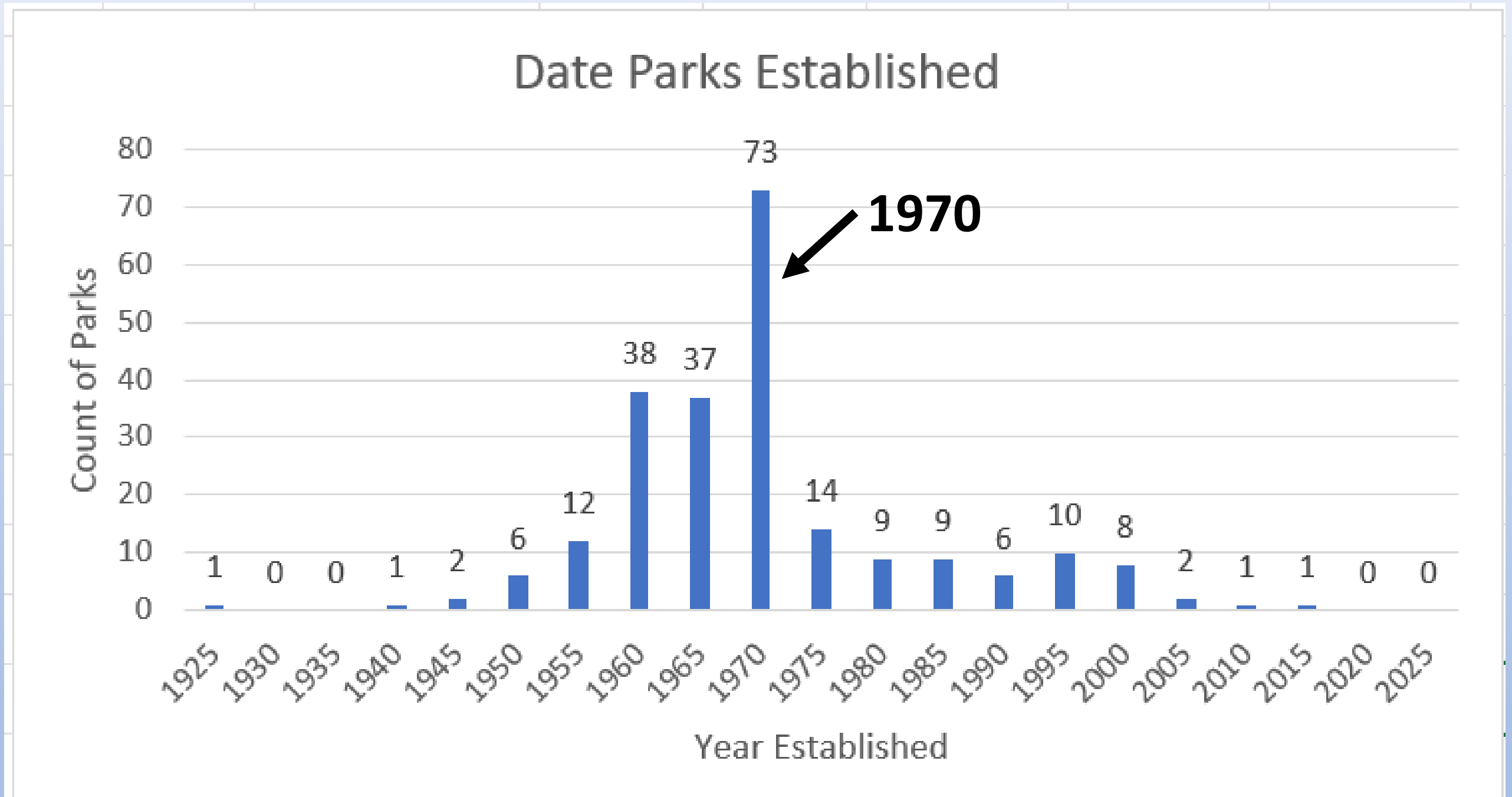


Vermont's Mobile Home Parks

- Age

- Size

- Ownership

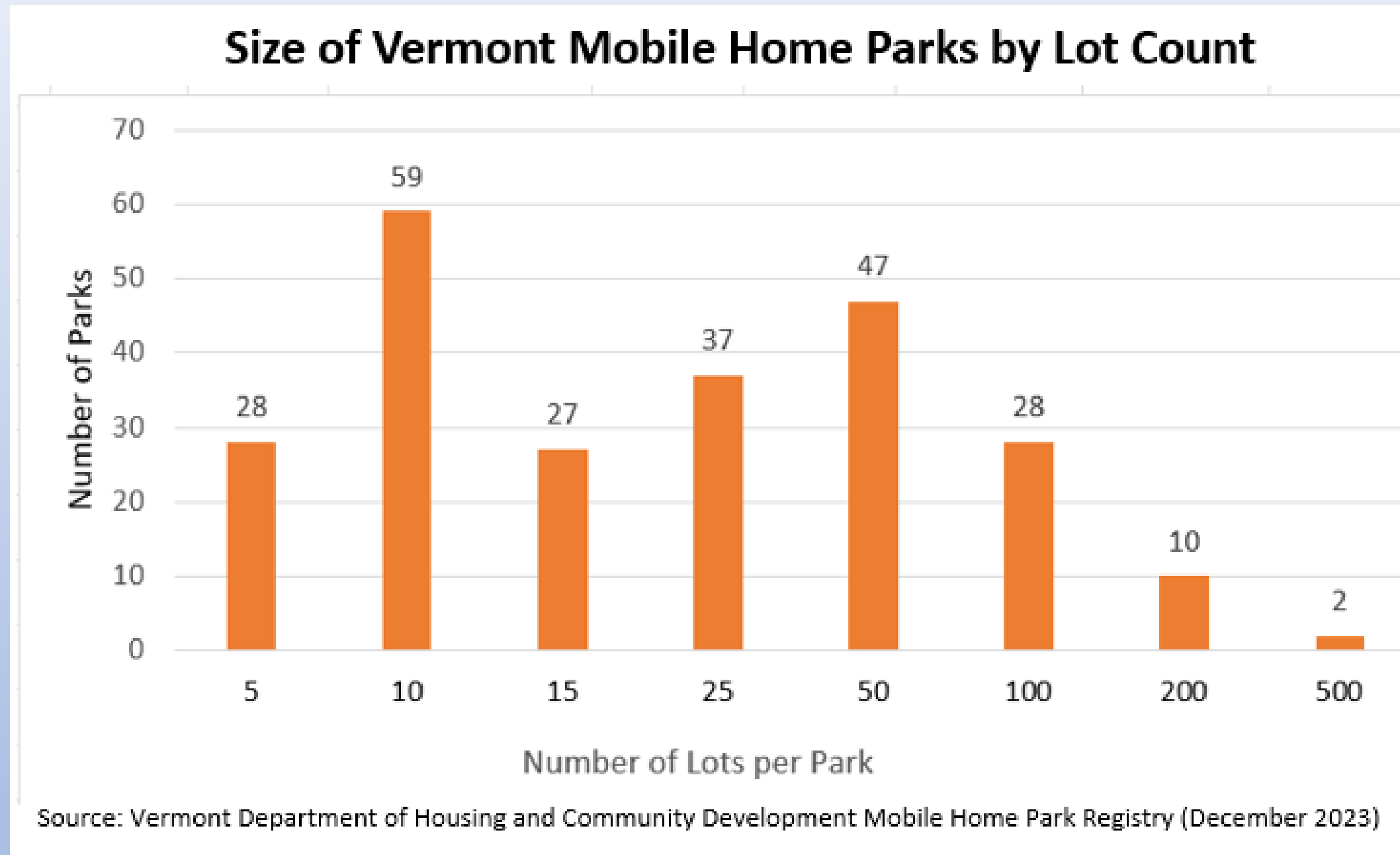


National and State Legislation

National Clean Air Act of 1970
Vermont Mobile Home Park Act
(10 V.S.A Chapter 153) 1970.

Vermont's Mobile Home Parks

- Age
- Size
- Ownership



Large parks have economies of scale

Infrastructure: roads, sewer, drinking water, electric

Small parks (< 20 lots) are endangered

Vermont's Mobile Home Parks

- Age
- Size
- Ownership

	Parks	Lots		
Status	Count	Average	Min	Max
Cooperative	20	85	9	262
For profit	170	21	2	151
Non-profit	48	37	6	172

Infrastructure: roads, sewer, drinking water, electric
Loan Rates

Small parks (< 20 lots) are endangered

**125 parks with a total of 700 lots
appear to be owned by individuals or
families.**

# of Lots	Parks
5	26
10	51
15	21
25	27
	125

Vermont's Mobile Home Parks Infrastructure

**Large million-dollar
projects**

**Can have complex
funding stacks**

**Grant, loan and
permitting
applications**



These are not municipalities with resources

Mobile Home and Park Data

CVOEO & UVM Surveys
U.S. Census American Community Survey
Mobile Home Shipments Data
VT Trans Reports
DEC
DCI Surveys
VHFA
DHCD Registry and Reports
Assessment Tool
Risk of Sale
Property Valuation and Review Data
Transfer Tax Refund
Vermont Grand List
Property Valuation and Review

Recommendations

The report first lists eight key findings and recommendations.

There are also a total of 22 more specific recommendations for the six charges to the Task Force.

Many are “continue and enhance” funding for existing programs

A couple are to focus on a specific issue that need research: data, purchasing, technical support.

Several groups working on issues. Listen to them every year.

Recommendations

Who to hear from:

DHCD – On status of mobile home parks and overall issues.

CVOEO – On governance issues and park residents

VHCB – On projects and programs

**Housing & Homelessness Alliance of Vermont (HHAV)
Manufactured Home Subcommittee**

And plenty more . . .