



February 6, 2024

Dear Committee Chair Hardy and Honorable Senators,

My name is Kelly Hamshaw and I am a Senior Lecturer in the Department of Community Development and Applied Economics and a Research Specialist in the Center for Rural Studies at the University of Vermont. Supporting the resilience and wellbeing of rural places is a primary motivator in my teaching and community-based research. I am humbled to have been invited to testify before this committee to share insights from our longstanding work focused on manufactured housing communities across the state and from our direct engagement with those impacted during the July 2023 flooding.

I have been asked to address the urgent needs that emerged in the flood-impacted manufactured housing communities and share recommendations for state government actions that could better support residents before, during, and after future disasters. I want to acknowledge that much of what I am sharing today is from a larger team of collaborators who have been deeply engaged in this work alongside me since even before Tropical Storm Irene, including my colleague UVM faculty member Dan Baker, our partners at the Champlain Valley Office of Economic Opportunity's Mobile Home Program, Disaster Case Manager volunteer JoEllen Calderara, and community leaders including Corinne Cooper, who has just provided the Committee with her in-depth firsthand account of her community's experience from the initial impact to the ongoing challenges that she and her neighbors are still navigating today.

It's important to recognize that Vermont's 238 Manufactured Housing Communities are the largest unsubsidized source of affordable housing for over 7,000 households. These are communities of homeowners who are renting the lots upon which their home sits. Our previous research has found that parks provide Vermonters with fixed or lower incomes with an important affordable housing option – especially given today's extreme challenges in the housing market. There is a higher percentage of older Vermonters living in these communities – not surprising given the advantages of single-story living as one ages. There are families with young children who are making ends meet – perhaps even living near a family member in the same community. In a door-to-door surveying effort in 2011, we found that 40% of respondents shared that someone in their household had a health condition or mobility challenge that would be a concern in an emergency situation.

The 2011 flooding events, the Memorial Day Storm and Tropical Storm Irene, underscored the vulnerability of manufactured housing communities to flooding. From Berlin to Brattleboro and Waterbury to Woodstock, 20 different parks had some level of damage. Personally, I was engaged most directly with the efforts in Weston's in Berlin – bringing UVM students to volunteer through the Central Vermont Long-Term Recovery Committee. The infrastructure was in place for managing volunteers, coordinating donations, and deploying case managers for Irene because of the Memorial Day Storms. Irene especially raised the challenges of what to do with the flood-destroyed homes – once a family's most valuable asset now turned into an expensive liability. All while navigating the challenges of flood insurance and complicated FEMA assistance while also trying to find temporary housing, determine a long-term plan, and recover emotionally and physically from the trauma brought by the disaster.



We were engaged in research at the time with goal of mapping all parks across the state and conducted an overlay analysis to see MHCs were indeed more at risk compared to manufactured homes on privately-owned land versus conventional single-family homes. Indeed, our analysis found that 12% of the homes located in parks were located in either the floodway, 100-year floodplain, or 500-year floodplain compared to about 6% of those located on privately owned land and 4% of single-family homes.

Moving forward to more recent work, from March to June 2023, with funding from the Vermont Rivers Program at the Department of Environmental Conservation, our team completed the Vermont Manufactured Home Communities Flood Risk Assessment with the technical expertise of the late Jarlath O’Neil-Dunne and the UVM Spatial Analysis Lab. We updated the park maps with the most current FEMA data and the Agency of Natural Resources’ River Corridor data. We identified 66 MHCs within mapped FEMA flood hazard areas within park property boundaries; 53 MHCs with actual lot locations at risk. Using the River Corridor data, we found 70 MHCs with property within those flood hazard areas and 48 of those had lots in the River Corridor. Twenty-four parks of the 70 with River Corridor risk are not in FEMA-mapped flood hazard areas—meaning that there 90 unique parks with some level of flood risk in our state. We held community conversations in three parks to share the maps and discuss the implications. We were actually in the Berlin Mobile Home Park, which lies nearly entirely within the mapped FEMA floodway, on June 3<sup>rd</sup>. This work, including all of the maps, is now available on the Flood Ready Vermont website so that residents and stakeholders can view the maps for their own communities.

Unfortunately, as you’ve heard today from Corinne Cooper, the challenges we saw in 2011 have not gone away. Berlin Mobile Home Park and River Run Manor, both in Berlin, saw extensive damage, with nearly all 40 homes left uninhabitable. Black River Mobile Home Court in Ludlow had a home carried away by the Black River in addition to a home with a twisted frame and others sustaining some degree of flooding. Twenty-three homes in Highland Heights in Johnson were flooded. And this committee recently heard testimony about the flooding impacts at Woodstock’s Riverside Mobile Home Park from the leader of Sustainable Woodstock and their community-driven volunteer efforts to meet local needs. We’ve been shown, yet again, the physical vulnerabilities of these communities and how those intersect with social vulnerabilities related to the socio-economic characteristics. In Berlin alone, we met single women in their 90s who were able to live independently up until the storm. Families with young children who are embedded in the local schools with family living nearby. Folks with jobs and medical providers located nearby who can’t easily move out of the area. People have been uprooted from communities that they enjoyed calling home and are beyond exhausted from putting their lives back together still, now nearly eight months later. During that time, residents have been working with too little to no information or clear guidance to make big decisions. Do they keep paying rent on their destroyed homes? Will they be able to rebuild their home in place? Is that even possible with concerns about mold and structural integrity? What program might they be eligible or ineligible for? People are having to make difficult decisions between what might too few and/or not great options.



**Moving to Recommendations:** We know that disaster events amplify the pre-existing conditions and vulnerabilities that were already in our communities the day before the disaster occurred. I offer these recommendations for the Committee’s consideration as opportunities for improving the health, safety, and wellbeing for our fellow Vermonters who these communities home:

- 1. Invest in existing MHCs located in safer locations** – MHCs are an important source of affordable housing that can provide Vermonters with low and moderate incomes with a valuable option. Investing in infrastructure, and more infill development where appropriate, within communities located outside of flood hazard areas. Strengthening the viability of these existing MHCs in safer locations would be a cost-effective measure for protecting this source of affordable housing.
- 2. Pursue hazard mitigation projects to reduce risk to MHCs** – We know the 90 MHCs that were identified as having some level of flood risk in the 2023 MHC Flood Hazard Risk Assessment. Prioritizing these at-risk communities for hazard mitigation activities can address increase resilience going forward into the future. These activities could range from elevating and anchoring of homes or pursuing upstream floodplain connectivity projects to creating infill lots in less risky places within an existing park to exploring options for building new communities in safer locations.
- 3. Develop permanent systems that can be activated when disasters happen** – Vermont is already experiencing increased frequency and severity in precipitation events due to climate change. Extreme wind events just last month led to significant roof damage to a family’s home in a non-profit owned park in my hometown of Bristol, highlighting how even isolated events, ones that don’t receive a federal declaration, can be devastating for a family. Developing clear policies and procedures that can guide immediate response and recovery efforts and inform longer-term decision-making. Determining points of contact that can gather information specific to these communities and communicate with residents. Establishing a state-funded disaster case management system that can be scaled to handle a range of disaster events would enable resources to be deployed much more rapidly. The ability to activate disaster case managers knowledgeable about the unique qualities of MHCs could improve support for impacted residents and lead to more favorable long-term outcomes.
- 4. Continue funding the Manufactured Home Improvement and Repair Program (MHIR) with a mechanism for prioritizing residents impacted by disaster events** – This program has been funded with American Rescue Plan Act funds for the past two years. This program has many co-benefits – from making urgently needed home repairs that can stabilize housing situations, while improving health, safety, and comfort for residents. Having continued and stable funding to support this program going forward will be helpful for communities before and after disasters. I personally know of several cases where residents have applied for MHIR funds to make urgently repairs to used manufactured homes located in other parks. This funding is essential today as home prices as have skyrocketed, FEMA award dollars do not stretch nearly as far as they once did in today’s housing market.



- 5. Enhance capacity at the CVOEO Mobile Home Program** – The CVOEO Mobile Home Program is a vital resource for MHCs across the state. Their relatively small team provides a range of services for residents encountering challenges of all types. They launched an emergency small grants program to help meet urgent needs while FEMA assistance and insurance payments were in process. With greater funding, the capacity of this resident-focused program can expand its engagement efforts and deepen its impact – especially with those communities who are most at risk.

Thank you so much for the opportunity to share about our ongoing research and engagement with Vermont’s manufactured housing communities. Events like Tropical Storm Irene and the July flooding underscore the urgency of taking action today to address the disproportionate burdens these communities face from climate change. Many families are still working towards their permanent housing solutions from the July flooding. It is critical to remain focused on supporting their recovery while also taking proactive steps for those communities also located in harm’s way. I am happy to answer questions at this time.

Respectfully submitted,

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*Photo Caption: Berlin Mobile Home Park, Vermont Civil Air Patrol, July 2023*