

January 26, 2023

Dear Members of the Vermont House Committee on Housing & General Affairs,

My name is Nate Lantieri and I am here today with my colleague Ryan Gerrity as Resident Organizers with the CVOEO Mobile Home Program (MHP) to provide you with information about our work supporting mobile home park residents in their efforts to protect and improve their housing rights and living conditions. Mobile homes (a term used interchangeably with “manufactured homes” in Vermont law) provide a critical homeownership opportunity to working class and fixed-income Vermonters. With mobile homes making up 7% of the state housing stock and being found in nearly every community in the state, they play a critical role in the past and future of our state’s communities.

Despite the important niche they fill, a history of underinvestment in community resources and still pervasive stigma have left many of the state’s mobile home communities (also known as “parks” or MHCs) facing uncertain economic and environmental futures. Without further support, simmering issues are likely to continue to worsen for many parks and homeowners, further heightening the potential (and very real) risk of immediate park closures and the subsequent displacement of hundreds of our most vulnerable neighbors in the midst of an incredibly difficult housing landscape. While the VT legislature has taken steps in recent sessions to address these concerns, there are still significant steps needed to ensure these Vermonters are given the opportunity to stay afloat through the current housing crisis and that these communities continue to fill their crucial role for the foreseeable future. As the only advocacy program dedicated specifically to the betterment of mobile home park residents, we at the CVOEO MHP are happy to share our experience with the legislature in hopes that it will continue to shine a light on this oft-overlooked, but essential component of Vermont.

### **Mobile Homes/Manufactured Homes**

The terms “Manufactured home” and “mobile home” are often used interchangeably when referring to factory-built homes - Vermont law does not distinguish between the two terms. The term “manufactured home”, as well as the first federal construction standards for this kind of housing, were established in the 1976 standards that have since been amended, often simply known as the HUD Code.

According to 2018 ACS data, manufactured homes represent 6.3% of the nation's housing stock, but make up a higher share (14%) of the housing stock in rural areas. For comparison, manufactured homes make up 7% of the VT housing stock (DHCD 2021 Registry) These figures account just for the manufactured homes that are located in one of the 236 registered VT "mobile home parks" (defined as contiguous land with more than 2 mobile homes under VT MH Law § 6201). Beyond this group, there are several thousand additional manufactured home owners (or renters) with homes situated on either land they own or on land that does not meet the qualifications of a mobile home park. The CVOEO MHP only serves mobile home park residents who own their home in a registered park.

Nationally and locally, most mobile home owners are both owners *and* renters: they own their homes but rent the land underneath in a mobile home park. Parks (also known as Manufactured Home Communities or MHCs) are located across Vermont, found both clustered near downtown hubs as well as spread throughout the further remote corners of the state. Mobile home parks are an important source of largely unsubsidized affordable home ownership opportunities for lower income Vermonters with 2021 statewide average lot rents nearly \$800 a month lower than the comparable 2-bedroom apartments rental rates in Vermont.

MHCs are found in every county and nearly every community in the state. While they each have unique features, they share a number of similarities amongst them. In particular, more than 75% of the parks in the state were built before the 1976 HUD Code. Their creation also largely predates many towns adoption of local zoning laws or the VT Mobile Home Law; today, many of the community systems in these parks have still not been replaced. While there are a number of similarities, key distinctions arise with differences in location, ownership type, park size, park infrastructure age, and park geography.

The term "mobile home" is often considered a misnomer as most are not moved from the first site that they are placed for residential occupancy. Nationally, 90% of manufactured homes are not relocated after they are initially sited; in Vermont, only about one percent of mobile homes in parks are moved in any given year (DHCD). The misperception of their mobility typically impacts the homeowner - moving a home is often presented as an option for solving negative park conditions, but the reality is that this option isn't viable due to the conditions of the home or its removal costs.

**What is the CVOEO Mobile Home Program?**

The Mobile Home Program is one of 3 Statewide Housing Advocacy Programs (HAP) of the Champlain Valley Office of Economic Opportunity (CVOEO) is one of state's five community action agencies that addresses fundamental issues of economic, social, environmental, and racial justice, and work with people to achieve economic independence. Through a variety of programs, CVOEO provides individuals and families with the basic needs of food, fuel and housing support in times of crisis, and helps them acquire the necessary education, financial skills and assets to build a stable future in which they thrive. The statewide HAP team (including Vermont Tenants, the Fair Housing Project, the Mobile Home Program, and other projects as funded), provide education, support, advocacy, technical assistance, and referrals for people and organizations and our team serves thousands of renters, mobile home residents, and people experiencing discrimination each year. We also partner with housing and service providers, municipal officials, and other organizations to promote inclusive, affordable housing for all

Since its creation in 1992, the Mobile Home Program at CVOEO has served as the only statewide mobile home park resident advocacy program in Vermont. Our team supports park residents by providing a variety of services, including direct housing counseling, community organizing support, rights-based education, and broader public advocacy. Our work is always in partnership with residents – the conversations we have with them on a daily basis inform our programmatic decision making. While resident focused, we regularly host and participate in broader MHC stakeholder meetings with park owners, managers, funders and other nonprofits to ensure all pieces are working together. Specific topic focuses have changed over the years, but have always been rooted in our rights-based education.

Primarily funded by the Department of Housing and Community Development (DHCH), the MHP has received in recent years additional funding to provide direct application assistance and housing counseling for the VERAP and VHAP programs. We also have received funding through the High Meadows Foundation/VCF for expansion of our outreach and community organizing activities (*known as our Civic Engagement project*), and other funding for small projects to provide our expertise in this sector. In the coming months, our team will additionally provide resident technical assistance for the home repair component of the forthcoming DHCD Manufactured Home Improvement & Repair Program (MHIRP) funded by the legislature in 2022.

Through its 30-year history, the MHP has never had more than four full-time team members despite serving the unique needs of parks found in some of the most remote areas of the state. As a small team trying to reach a large constituency of more than 7000 homes in about 236 Mobile Home Parks, it is through our *VT Mobile Home Hotline* that most people are able to access CVOEO MHP program and services and the trends and outliers we capture on the Hotline then inform our organizing and advocacy goals. In 2022, the Hotline received more than 700 calls for support from 80 unique mobile home parks in nearly every county.

To make sure we were truly reaching and engaging harder-to-reach residents of every parks across the state, our MHP team has undertaken a Civic Engagement focused project where we have proactively visited approximately 45% of the lots in the state (~3,000 homes) in more than 60 parks spread across 12 counties since the Fall of 2021. While primarily focused on empowering residents through different avenues of rights-based education, we in the process brought information and expertise about many of the current applicable aid programs in the state the “last mile” to some of the most rural communities in the process.

### **Recent Legislation and Funding**

The VT Mobile Home Park Law is found in [Title 10 V.S.A Chapter 153](#) of the Vermont Statutes. It covers many of the issues uniquely associated with living in a mobile home park, ranging from defining responsibilities of utility maintenance to what happens when a park is listed for sale.

Beyond the Mobile Home Law, the legislature has taken steps in recent years to begin to address the most direct needs in VT mobile home parks:

- Act 182 of 2022 – Housing Omnibus Section 3 allocated funds towards DHCD for the soon-to-be-administered MHIRP for individual home repair grants, foundation & small capital projects.
- Act 154 of 2022 - Environmental Justice bill recognizing MHC residents as disproportionately impacted by environmental burdens and creating a position for park residents on the Environmental Justice Advisory Council
- Act 179 of 2020 – Authorizing limited technical assistance funding for Tri Park Cooperative to navigate infrastructure improvements and recognizing the larger need for park technical assistance in all MHCs

- Act 8 of 2015 – Established DHCD as park oversight body and clarification of park owner/resident responsibilities
- Act 137 of 2012 – Recognition of the disparate impact of Hurricane Irene on mobile home parks and expanding the home replacement tax credit (*Now the CHT Manufactured Home Down Payment Assistance Program*)

Additionally, through the ARPA-funded Healthy Homes program administered by the Department of Environmental Conservation, \$3.25 million will shortly be directed towards mobile home park water infrastructure. These funds will immediately make a positive impact in addressing the most expensive widespread need for parks, however, they have not yet been disbursed to make that impact. This is generally true for much of the greater impact of these acts relating to mobile homes – while they are steps in the right direction, sustained funding and interest is needed to ensure the Vermonters who need it most are able to actually benefit from their provisions.

### **Recommendations Based on Assessed Needs**

Through working alongside mobile home park residents on a daily basis and regularly visiting parks throughout Vermont, our team has come to identify a series of common challenges threatening the long-term sustainability of the entire statewide park network. The recommendations, proposed in our “2023 Legislative Recommendations” attached at the end of this document, reflect the shared perspective of the residents we serve and our own firsthand experience. The first 3 of our 6 recommendations are:

**Higher and sustained funding for individual mobile home repair grants** accessible to all income-eligible mobile home owners in all community types statewide through the expansion of grant size for repairs that create immediate displacement-level risks but exceed the scope of existing supports (~\$15,000). As currently laid out, the existing home repair grant/loan landscape in Vermont has significant funding shortage that might exclude hundreds of mobile home owners, by no fault of their own. Additionally, there currently is little dynamism with existing funding; even an eligible applicant with a home-destroying plumbing leak may need to wait more than 2 months before they know if they are able to access these lifesaving funds. Additionally, the creation of an ongoing flexible funding pool (\$100,000)

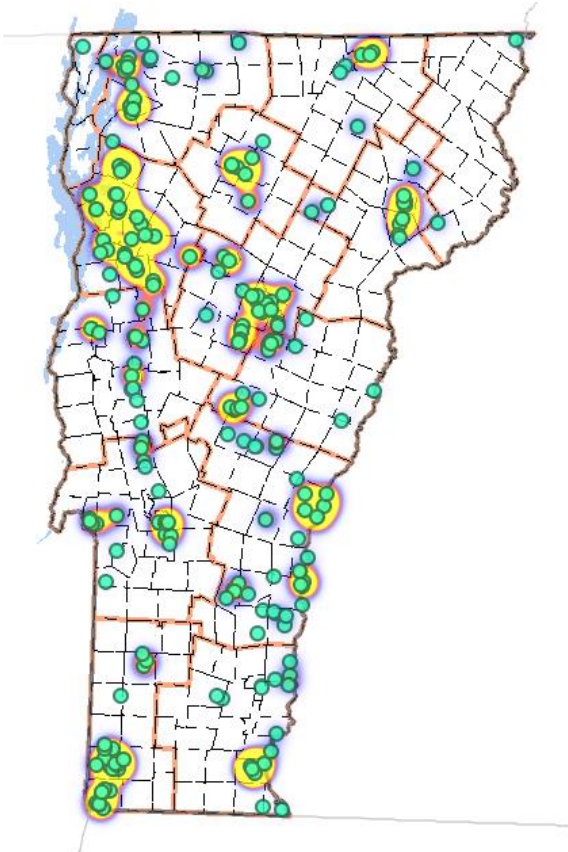
accessible on a shortened timeline for crisis situations administered by the Mobile Home Program of CVOEO should be strongly considered.

**Sustained funding for mobile home parks technical assistance services**, specifically for the unique needs of mobile home residents and communities through direct investment in the CVOEO Mobile Home Program as the statewide mobile home park technical assistance provider-in the vein of that provided to Tri Park Cooperative by DEC as part of Act 179 of 2020. This would bring information and technical assistance to the final mile as MHP services and staff are well-versed in the unique challenges that mobile home residents and their communities face. This would ensure successful usage of state resources and programs for these largely vulnerable communities. A funding of \$300,000 would guarantee technical and direct navigation and coordination support services for approximately 200 households a year for a period of 3 years.

**Continued funding for mobile home park water infrastructure**, specifically focusing on parks without strong administrative/technical capacity to ensure the parks (and residents) that need it most are given opportunity to apply for this potentially transformational funding. Funding should be applicable for improving park drinking water and septic systems, connecting park systems to municipal water systems, improve flood resilience, and protecting park roads from erosion.

As a state, we need to further invest in our mobile home communities' future to preserve this incredibly valuable component of our affordable housing network. Parks and residents need immediate investment through the expansion of grant programs accessible to mobile home communities and individual households, continued funding for mobile home park water infrastructure, funding of CVOEO's Mobile Home Program as the statewide comprehensive dedicated technical support provider, strengthening of mobile home owner protections in Vermont statute and the assistance for the purchase of more mobile home parks along with further dedication of mobile-home-specific considerations in all housing assistance programs so that this critical form of affordable housing is preserved and strengthened.

**Vermont's Mobile Home Park Demographics**



	Parks	Lots	Occupied
Addison	15 (6%)	387 (5%)	381
Bennington	25 (11%)	704 (10%)	624
Caledonia	12 (5%)	374 (5%)	312
Chittenden	24 (10%)	1851 (26%)	1796
Essex	2 (1%)	42 (1%)	39
Franklin	27 (11%)	466 (7%)	435
Grand Isle	2 (1%)	32 (1%)	25
Lamoille	7 (3%)	327 (5%)	314
Orange	15 (6%)	278 (4%)	220
Orleans	6 (3%)	215 (3%)	207
Rutland	25 (11%)	432 (6%)	362
Washington	24 (10%)	593 (8%)	538
Windham	16 (7%)	499 (7%)	475
Windsor	36 (15%)	880	809
<b>Grand Total</b>	<b>236</b>	<b>7080</b>	<b>6537</b>

	Parks	Lots	Occupied
Cooperative	20 (8%)	1702 (24%)	1673
For profit	168 (72%)	3602 (51%)	3242
Non-profit	48 (20%)	1776 (25%)	1622
<b>Total</b>	<b>236</b>	<b>7080</b>	<b>6537</b>

*MHCs in Vermont with population-weighted heat map*

*Data Based on 2021 DHCD Mobile Home Park Registry, map generated with VT Open Geodata Portal*

- Since 1989 (expansion of park purchase opportunity) 68 parks have become coop or nonprofit
- 75% of all parks opened before 1976
- Oldest Park – Burlington’s North Avenue Cooperative (1926)
- 7080 total lots with 6537 occupied lots (7.6% statewide vacancy rate)
- Less than 1% of homes are re-sited in a given year in VT (DHCD)
- 92% of occupied lots are owner occupied homes
- 85% of small parks are privately owned

## Costs of manufactured homes vs “stick-built” homes

Average Home cost (2021 US Census Bureau Manufactured Housing Survey data)

- Average new manufactured home
  - o 2017 - \$70,100
  - o 2022 - \$122,500
    - In 2020-2021, this rose by 37%
    - Average price of a new single-wide was below \$50,000 until 2019
- Average national sale price for a new site-built home in 2021 - \$365,900

## Costs of MHC lot rent vs comparable VT Apartment rent

- Average lot rent 2021
  - o Statewide - \$360
  - o Chittenden Co. - \$455
- Average 2BR apt rents 2021
  - o Statewide - \$1,111
  - o Chittenden Co. - \$1,347

## Mobile Home Owner Income

According to the 2021 ACS dataset, the national median annual household income of:

- site-built homeowners - \$97,000
- manufactured home owner - \$57,000;
  - o Over one-quarter earn less than \$20,000 annually
  - o two-thirds earn less than \$50,000 annually.

An Addison County Community Trust (ACCT) 2022 cost analysis of new manufactured homes found:

- \$65,000 - Income needed to afford a replacement home in 2022
  - o Means only 30% of income is going towards housing
  - o Price estimate includes usage of \$25,000 CHT administered Manufactured Home Replacement tax credit
- 75% of their residents have income below \$50,000