

February 2, 2023

Dear Members of the Vermont Senate Committee on Econ. Dev., 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 talk about the most pressing concerns we have identified from our work supporting mobile home park residents in their efforts to protect and improve their housing rights and living conditions.

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 by playing a key role in broader public advocacy for MHC residents.

While the MHP is primarily funded by the Department of Housing and Community Development (DHCD) for those activities, we have received additional funding in recent years to provide direct application assistance and housing counseling for the VERAP and VHAP programs. In the coming months, our team will additionally provide resident technical assistance for the home repair component of the DHCD Manufactured Home Improvement & Repair Program (MHIR) funded by the legislature in 2022. Our small team works with park residents daily; their experiences inform our decision making.

Mobile homes (also known as “manufactured homes”) are a critical source of affordable homeownership across the state, making up 7% of the Vermont housing stock with MHCs found in every county in nearly every community. Statewide, there are more than 7000 homes in the state’s 236 registered manufactured home communities (also know as “MHCs” or “mobile home parks” in VT laws).

MHCs are particularly accessible as they are a largely unsubsidized affordable housing option; in 2021 statewide average lot rents were nearly \$800 a month lower than the comparable 2-bedroom apartments rental rates in Vermont. This is especially important in remote areas with low rental vacancy - manufactured homes make up 14% of the national rural housing stock. On average, manufactured home owners made \$40,000 less per year than “stick-built” home owners according to 2018 national ACS data. Regularly, we work with families making less than \$20,000 a year that are still able to get by

with low lot rent payments; nationally more than 25% of manufactured home owners are below that threshold. The low lot rent payments are all many low-income or fixed-income Vermonter's can afford.

Despite the important niche they fill, a history of underinvestment in community resources and still pervasive stigma have left many of the state's MHCs facing uncertain economic and environmental futures. Without further support, simmering issues are likely to continue to worsen, further heightening the potential (and very real) risk of park closures and the subsequent displacement of hundreds of our most vulnerable neighbors.

While the VT legislature has taken steps in recent sessions to address these looming concerns, additional attention is needed to ensure these Vermonters are given the opportunity to stay afloat 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.

By working alongside mobile home park residents and within many of Vermont's MHCs, our team has identified a series of common challenges threatening the long-term sustainability of the entire statewide park network. The recommendations presented here reflect the shared perspective of the residents we serve and our own firsthand experience working deeply within this network and in MHCs:

Recommendations Based on Assessed Needs

1. **Sustained funding for individual mobile home repair grants** accessible to all income-eligible mobile home owners in all registered mobile home communities statewide, meeting the highest level of need beyond existing support (up to \$15,000 per household). On an individual household level, the greatest unmet need for many mobile home owners is a lack of access to home repair funds that could prevent the further degradation or potential condemnation of their home. Unfortunately, many mobile home owners are ineligible for existing repair resources for myriad reasons. 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 also be strongly considered.
2. **Sustained funding for mobile home parks technical assistance services**, specifically to support 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. This service, to be conducted in the vein of that provided to Tri Park Cooperative by DEC as part of Act 179 of 2020, would ensure MHCs are able to more equitably and effectively navigate state resources. At a community level, successful uptake of available resources will be the key determinant of the network's future sustainability – investing in sustained technical assistance now can push the states mobile home parks in the right direction.

3. **Continued funding for mobile home park water infrastructure**, specifically focusing available ARPA Healthy Homes resources on parks without strong administrative/technical capacity to ensure the parks (and residents) that need it most are given realistic opportunity to apply for this potentially transformational funding.
4. **Additional funding given for mobile home-specific legal assistance** including the creation of a mobile home statute legal specialist position able to provide legal counsel to mobile home owners. Additionally, it is imperative there be pathways created within jurisdiction of oversight agencies like DHCD and DEC that ensure park resident complaints receive enforcement measures that are effectively enacted. If creating a specialist position is not possible, creating a legal fund accessible to park residents could be established for more nuanced community-level legal situations such as issues with probate court or prolonged resident rights violations without correction. From experience, there are countless rights violations or near violations across the state where the residents have little ability. As less than 1% of mobile homes are moved from their original site in a given year in VT, if the situation further devolves, the homeowner can potentially lose their home to their park owner and become homeless as it is claimed as abandoned property or sold at below market value. In other cases, if the park's ownership is stuck in a legal quagmire, residents may feel the most acute harm should the situation remain unresolved. Increasing capacity in these areas would also help close loopholes in the current statute that allow for chronic rights violations and environmental injustices.
5. **Assistance for the purchase of mobile home parks to maintain them as affordable housing** through subsidy, down payment assistance, interest rate relief, or other model to increase the likelihood that parks are able to be purchased by a nonprofit or become resident-owned communities when they

are sold. Due to the history of underinvestment, affordable housing providers have been reluctant to add mobile home parks to their portfolio in recent years out of trepidation that they may uncover significant infrastructure or capital needs after taking ownership, leaving new parks up for sale as easy prey to out of state investors. We have seen consistently that nonprofit and resident ownership models maintain lower lot rents than for-profit park ownership, yet the barriers to these models are continuously increasing. While we have thus far largely avoided the national trend of large out-of-state investors buying Vermont's mobile home parks, we have seen signs of moving in this direction.

- 6. Further dedication of mobile-home-specific considerations in all housing assistance programs,** including provisions that consider the unique needs of mobile home residents in all future broad housing investments and through the creation of a working group of pertinent state departments (DEC, DHCD, VEM and others) to consolidate understanding of these needs and how to address them. As currently structured, certain programs disadvantage park residents when compared to other Vermonters just by virtue of their home type – we will continue to work with state agencies and officials to expand fair access and environmental justice.

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. While the issues seem numerous, we believe (and have seen from experience) that even a small amount of financial relief that is well targeted can make a real difference for MHCs and in the lives of park residents.

Although we have primarily talked about the issues today, I also would like to make clear that MHCs are and can be vibrant, affordable, sustainable communities if residents are given the opportunity to succeed. We are grateful for the opportunity to be here today to support park residents and hope that in the near future, as a state, we can fully address what we have discussed. We are happy to take any questions and hope to continue this conversation with the legislature throughout the session.

Nate Lantieri & Ryan Gerrity

CVOEO Mobile Home Program – Resident Organizers