



Housing Advocacy Mobile Home Program

255 S. Champlain St., PO Box 1603, Burlington, VT 05402 MHP Hotline: 802-660-3455 x 204

January 25, 2024

Dear Honorable Committee Chair and Honorable Senators,

Thank you for the opportunity to testify today about the state of mobile home communities in Vermont with a focus on the current needs of mobile home parks after recent natural disasters.

My name is Sandrine Kibuey, I am the Director of Housing Advocacy Programs at the Champlain Valley Office of Economic Opportunity. Our programs provide education, support, advocacy, technical assistance, and referrals for people and organizations and our team serves thousands of renters, mobile home residents, asylum seekers, 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. The Mobile Home Program (MHP) is dedicated to empowering mobile home residents through direct support, community organizing, and education while working to protect and improve their housing rights and living conditions.

We are again coming to you to request an urgent and significant investment in mobile home parks and their residents, aiming to prevent the loss of hundreds of affordable housing units and the risk of Houselessness for many Vermonters, especially those affected by current natural disasters.

CVOEO MHP services are directly informed by the unique and everyday challenges that mobile home residents and their communities face working with park residents daily. Ryan Gerrity, our Mobile Home Program Senior Resident Organizer, will be detailing CVOEO MHP' legislative priorities, while JoEllen Calderara, a disaster recovery expert and our CVOEO MHP community service specialist volunteer, will focus on gaps and challenges observed on the ground caused by the latest floodings and storms. Recommendations on addressing challenges and gaps will also be presented.

MHP Priorities

- 1. Sustained funding for mobile home parks technical assistance and support services**, to support the unique needs of mobile home residents and communities, through direct investment through BAA funding of eviction prevention legislation enacted in Act 47. Indeed, Act 47, sec. 43 provides that a statewide program of screening, referral and follow-up services be provided where the court could also refer to. After major flooding disasters and deepening housing crisis our State has been experiencing and CVOEO effectively providing its statewide essential housing support services and flooding response and recovery efforts, we are adamant that the creation of a Statewide Office of Rental Housing Stabilization Services should be housed within CVOEO Statewide Housing Advocacy Programs. The program would be available for both landlords and tenants, therefore to Mobile home residents and mobile home park owners as well and CVOEO is ready to stand up such a program if it is funded.

- 2. Continued funding for individual mobile home repair grants and mobile home park water infrastructure** for many mobile homeowners the lack of access to home repair funds is a potential condemnation of their home. By expanding state investment in home repair grants, the state is supporting a major houselessness prevention initiative. Aside from access, the other need is immediate or emergency access; even an eligible applicant with a home-destroying plumbing leak may need to wait more than 2 months before they know if they can access these essential funds in the current landscape. The creation of an ongoing flexible funding pool (\$100,000) readily accessible for unique client crises administered by the Mobile Home Program of CVOEO should be strongly considered to address these and other complex housing stability issues.
- 3. Additional funding for mobile home-specific legal assistance**, including the creation of a mobile home statute legal specialist position able to provide legal counsel to mobile homeowners. Additionally, our state housing network will be stronger by creating pathways within the jurisdiction of oversight agencies like DHCD and DEC to ensure park resident complaints receive legal support in a timely fashion and that enforcement measures are effectively enacted. Instead of direct staffing, 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.
- 4. Assistance for the purchase of mobile home parks to maintain them as affordable housing** through subsidy, down payment assistance, interest rate relief, or another model to increase the likelihood that parks can be purchased by a nonprofit or become resident-owned communities when they are sold. Nationwide, there is rising purchase pressure from multi-national investors buying mobile home parks as speculative investments. Residents of parks that may be more vulnerable due to their smaller size, lack of adequate management by private ownership, infrastructure issues, and who face the most barriers, need additional support to pursue and realize these goals.
- 5. Strengthen and expand Mobile Home Parks** which offer home ownership, affordability, and accessibility to households with low income but are decreasing as a share of available housing at a time when our State is in dire need of affordable housing. State land and dollars should be used to create new mobile home park communities offering opportunities and the dignity of homeownership and rental affordability for thousands of vulnerable Vermonters. The first step to such consideration would be funding a feasibility study and infrastructure assessment for the development of four regional mobile home parks with 150 energy-efficient manufactured homes, meeting the DOE Zero Energy Ready Home (ZERH) standards, to support this major initiative and give affordable housing access to hundreds of unhoused families.
- 6. Further dedication to actively consider the impact on MHPs 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.

Flooding and Natural Disasters due to Climate Change

Urgent Challenges:

- 1. Challenges in housing replacement awards.** Residents with condemned homes rarely received the maximum Housing Replacement Awards. Despite fifty-two manufactured homeowners receiving "Condemned to be Destroyed" orders from the State Fire Marshal's Office, award amounts varied from \$8,880 to \$32,000. Some homeowners had to appeal FEMA's decisions and provide contractor estimates for repairs to their condemned homes. Others were required to enter their unsafe homes, often without proper protective equipment, for FEMA's "virtual inspections." This process was mentally and physically exhausting for residents already dealing with significant losses.
- 2. Severe shortage of affordable housing options.** The flood disaster revealed a significant shortage of affordable housing options, both for short-term and long-term needs. Many residents sought temporary refuge with family or friends due to the lack of affordable alternatives. In flood-affected areas like Berlin, Johnson, and Ludlow, secure, long-term affordable housing remained scarce. The cost of new manufactured homes had risen since 2011, reaching \$90,000. Coupled with HUD-approved lot prerequisites, this posed significant financial challenges for homeowners, even if they received FEMA's maximum \$41,000 award.
- 3. Challenges with lot rent and evictions.** Some residents in Mobile Home Communities (MHCs) faced demands for lot rent payments or received non-payment of rent notices. Park owners, like Ran-Mar/HARR/Randy Rouleau, insisted on monthly lot rents despite homes being flooded and possessions still present. The park owner justified this based on the intact water and wastewater infrastructure. This created additional financial burdens for homeowners, especially during efforts to secure maximum FEMA assistance. Some residents who could not pay August lot rent received non-payment notices. The return of residents to Berlin and River Run mobile home parks, located in flood hazard areas with recurring damage risks, remained uncertain.
- 4. Lack of guidance for homeowners.** Homeowners in MHCs faced an urgent need for information on their best next steps. The appeal window for homeowners was closing rapidly, with looming September rent payments adding to their challenges. Organized efforts in Vermont to remove destroyed mobile homes depended on homeowners completing FEMA appeals and SBA disaster aid procedures. Homeowners required clarity on their options and potential assistance avenues, particularly if condemnation verdicts did not yield maximum awards.
- 5. Pressure to sell mobile homes at low prices.** Post-flooding, some mobile home residents encountered pressure to undersell their homes to park owners or salvagers, often without fully understanding the potential for salvage or replacement. This practice could jeopardize homeowners' access to disaster recovery funds, especially when combined with accumulating lot rent costs for their damaged homes.



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Recommendations:

- 1. Establish a permanent housing crisis and disaster response position at CVOEO.** Having a permanent, State funded, Disaster Case Manager (DCM), located at CVOEO year-round within CVOEO's Housing Advocacy Programs, is vital. With the help of a DCM, 2 damaged mobile homes in Berlin received the full \$41,000 FEMA grant. It is vital that this Disaster Case Manager position be funded by the State and not through FEMA, as FEMA-funded DCM programs can take months to stand up and FEMA-funded DCMs are confined to assisting only disaster-impacted residents. Non-FEMA funded DCMs would be able to assist with damaged homes that fall outside of a "declared" disaster, such as mobile homes that were damaged last July located in Addison County, or homes damaged during the December 2023 flooding or the January 2024 windstorms. This position would play a pivotal role in swift disaster case management, as evidenced by our team's effectiveness, and will also serve as a repository for critical knowledge on mobile home-specific FEMA and SBA treatment, ensuring immediate dissemination after disasters and more efficient management of the many complex housing cases that follow these disasters.
- 2. Increase Capacity for Mobile Home Repair Funds.** Building on our advocacy for sustained home repair funds, there is the challenge of additional flexibility needed to address disaster situations such as flooding for all state programs. Critical programs like the Manufactured Home Improvement and Repair Program (MHIR) have been able to provide substantial aid to families that struggled to receive FEMA benefits. Additionally, assistance such as our Flood Recovery Assistance Fund (FRAF) providing direct financial aid to those most affected, and the early activation of the program, was extremely helpful in meeting the immediate needs of recovering residents.
- 3. Provide Increased Legal Assistance for Mobile Home Clients.** In response to the heavy legal burden on mobile home clients seeking SBA loans post-disaster, greater access to legal assistance is needed. This would streamline the process and alleviate financial stress. The availability of legal support tailored to mobile home clients is essential for their recovery.
- 4. Explore Opportunities for New Mobile Home Parks (MHPs).** Recognizing the importance of manufactured housing communities (MHCs) and their affordability in Vermont's housing landscape. We must align this reality with the need for permanent affordable housing and explore opportunities for establishing new Mobile Home Parks (MHPs) outside flood plains.

We believe that continued action over the coming years is required to tend to the crucial issues affecting the lives, health, safety, and well-being of this important labor force community and affordable housing sources.

Thank you for your attention,

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