

2025

**Housing Justice Priorities:
Legislative Action Toolkit**

Dear Members of the Vermont Legislature,

The Champlain Valley Office of Economic Opportunity (CVOEO) Statewide Housing Advocacy Programs (HAP) are deeply committed to the principle that housing is a fundamental human right. Our mission is to ensure that every Vermonter has equitable access to secure and maintain a home, free from discrimination and unnecessary barriers. Through our advocacy and programs, we work to improve housing stability and accessibility across the state, focusing on policy reform and resource allocation that serve the needs of Vermont's most vulnerable residents.

This toolkit outlines the key legislative priorities we seek to address during the 2025 session. These priorities are organized under three main themes:

- **Strengthening Tenant Rights and Protections**
- **Preserving and Expanding Affordable Housing**
- **Providing Support for Vulnerable Populations**

We have indicated the priorities as policy-related recommendations that **do not require funding** and those that **require funding**. Each priority is summarized in the legislative checklist, with detailed explanations provided in subsequent pages to offer context, data, and recommendations for action.

Our team views all of the priorities as essential needs for our Vermont communities who are most at risk of housing instability. We encourage you to review these priorities, consider their impact on housing stability and affordability, and check off the items you support. Your commitment to addressing these priorities in the state house is vital to ensuring that every Vermonter has the opportunity to live in safe and equitable housing.

Thank you for your attention to these critical issues and for your partnership in creating a more just and supportive housing environment in Vermont.

Sincerely,

CVOEO Housing Advocacy Programs Team

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Strengthening Tenant Rights and Protections

"No Cause" Evictions were the reason given by landlords in 21% of eviction cases filed in Vermont in the last year. Non-court related terminations and exorbitant rent increases—well beyond a typical renter's ability to pay—effectively serve as terminations and drive this number much higher.

In 2024, our VT tenant's helpline alone received **3,048 calls and emails** from renters seeking support for housing challenges.

Preserving and Expanding Affordable Housing

The Manufactured Housing Improvement and Repair (MHIR) Program has funded critical repairs for **329 homes** since 2023—with CVOEO's Mobile Home Program providing technical assistance for more than **2/3** of these households—preserving affordable housing and ensuring stable, healthy living conditions for residents.

18 mobile home parks, comprising 1,632 lots, are impacted by the 3-acre stormwater rule. These requirements place a significant burden on these communities to maintain their affordability.

More than **809 homes** located in Mobile Home Parks **(11%)** are in a food hazard area.

More than **277 homes** damaged by flooding in 2023.

Providing Support for Vulnerable Populations

"When I was no longer safe in my country it was like I lost my roots. I had to leave but because of CVRAN, I found people who helped me grow new roots, grow new leaves. Because of CVRAN, I survived. ...Today I feel safe. I have a home. I have work, I am part of a community. Without their support, I could not have done it. Nobody can remake a life without support." - Asylum grantee supported via SASAP

HOME voucher has housed **~150 families** since 2023.

SASAP provided critical support services to **155 asylum seekers** in 2024

Housing Justice Priorities Legislative Checklist

<input type="checkbox"/>	1	Support Statewide "Just Cause" Eviction Protections to <u>remove ambiguity and prevent arbitrary termination of tenancy.</u>		Ref. 1A
<input type="checkbox"/>	2	Expand Fair Housing Protected Classes to Include "Citizenship & Immigration Status" to <u>prevent housing discrimination.</u>		Ref. 1B
<input type="checkbox"/>	3	Support Rent Stabilization & Reintroduction of H.135 to <u>protect tenants from excessive rent increases.</u>		Ref. 1C
<input type="checkbox"/>	4	Limit Security Deposits to One Month's Rent Statewide to <u>reduce financial barriers for prospective tenants.</u>		Ref. 1C
<input type="checkbox"/>	5	Require all landlords to complete approved rental law education to <u>ensure consistent understanding and application of tenant rights.</u>		Ref. 1D
<input type="checkbox"/>	6	Remove "+1%" From the Threshold for Triggering Mediation on MHC Lot Rent Increases to <u>Protect Vermonters on Fixed Incomes.</u>		Ref. 1E
<input type="checkbox"/>	7	Clarify Lot Habitability Standards in Manufactured Housing Communities (MHCs) to <u>better address issues with Erosion & Flooding.</u>		Ref. 1E
<input type="checkbox"/>	8	Set Minimum Potable Water Supply Standards During Mobile Home Park Water Outages to <u>Protect Vermonters Basic Human Needs.</u>		Ref. 1E
<input type="checkbox"/>	9	Require Siting of New MHCs Outside of Flood Zones to <u>protect vulnerable residents from displacement.</u>		Ref. 2A
<input type="checkbox"/>	10	Reform Three-Acre Stormwater Rule Implementation for MHCs to <u>protect affordable housing while maintaining environmental goals.</u>		Ref. 2B
<input type="checkbox"/>	11	Fund a Feasibility Study & Infrastructure for Four New Manufactured Housing Communities to <u>expand affordable housing options statewide.</u>	\$	Ref. 2C
<input type="checkbox"/>	12	Provide Funding for one Additional Staff Member for Vermont Tenants (VTT) Housing Coaching Services to <u>support renters facing hardship</u>	\$	Ref. 3A
<input type="checkbox"/>	13	Provide \$400,000 Annual Funding for Statewide Mobile Home Resident Organizers to <u>sustain critical support services statewide.</u>	\$	Ref. 3B
<input type="checkbox"/>	14	Renew and Expand Funding for the Asylum Seekers Assistance Program to <u>expand services that help asylum seekers integrate into Vermont's workforce.</u>	\$	Ref. 3C
<input type="checkbox"/>	15	Support an "Office of New Americans" Equivalent to <u>meet the growing need for a legal intake and referral system for asylum seekers and immigrants.</u>		Ref. 3D
<input type="checkbox"/>	16	Expand funding for the HOME Voucher Program to \$2.4 Million to <u>ensure we can help the unhoused Families who are in need.</u>	\$	Ref. 3E

Legislative Action Details For Reference

CVOEO's Statewide Housing Advocacy Programs' services and activities are grounded in the fact that housing is a basic human right and that everyone deserves equitable access to securing and maintaining a home, free from discrimination.

I. Strengthening Tenant Protections and Fair Housing

We believe that several measures would collectively strengthen tenant rights and protections in Vermont. These measures are grouped under this priority:

A. Support Statewide "Just Cause" Eviction Protections

FOR MORE EFFECTIVE HOUSING STABILITY AND HOMELESS PREVENTION, WE NEED STATEWIDE EVICTION PROTECTIONS.

"No Cause" Evictions are the reason given by landlords in 21% of eviction cases in Vermont. "Just Cause" eviction policies protect tenants from arbitrary, retaliatory, and discriminatory evictions by establishing specific reasons that a landlord can evict. These policies can also provide tenants with the right of first refusal to renew a lease when it expires. Several communities around the state have passed Just Cause eviction protections, including Burlington, Essex, Winooski, and Montpelier. However, to be enacted, this requires a charter change to go through the legislature, and the Burlington measure was vetoed by the Governor in 2022.

We urge your support in establishing statewide "Just Cause" eviction protections to ensure greater housing stability and prevent arbitrary and harmful terminations of tenancy.

B. Expand Fair Housing Protected Classes to Include "Citizenship & Immigration Status"

WE NEED TO REINFORCE HOUSING JUSTICE AND EQUITY.

Federal Fair Housing law protects against discrimination in housing based on people's membership in protected classes, such as race, color, national origin, religion, sex, disability, and family status. States can add additional protections and in VT, we have added gender identity, sexual orientation, age, marital status, receipt of public assistance, and being a

victim of assault, sexual abuse, or stalking. We support efforts by Migrant Justice, the Vermont Human Rights Commission, and partners to increase protections for undocumented Vermonters to help ensure that non-citizens and undocumented families (such as migrant farm workers or construction workers) are not treated unfairly as they seek to rent, buy, finance, or live in their homes.

We urge you to support the expansion of Fair Housing protected classes by adding “citizenship and immigration status” to the protected classes list under Vermont’s Fair Housing law.

C. Implement Rent Stabilization Measures

RENT STABILIZATION COULD STRENGTHEN HOUSING JUSTICE AND EQUITY EFFORTS.

Over the past few years, we have seen a dramatic number of tenants reporting an increase of \$200, \$300, \$400, and more in their annual lease renewals. This often leaves people without the ability to pay and can also affect their ability to use vouchers by putting their rent above the allowed amount. The rapid increase in rents disproportionately impacts low-income Vermonters and communities of color. We support a limit on the amount a housing provider can increase rent each year as an effective tool to increase housing stability and affordability to protect tenants from excessive rent hikes and create a predictable schedule for the maximum rent increase allowable each year while ensuring a fair return for landlords.

Additionally, limiting statewide a security deposit to the equivalent of one month’s rent, as both the cities of Burlington and Brattleboro already do, would reduce barriers and make rentals more attainable.

We urge you to support statewide rent stabilization policies: reintroduce and back House Bill H.135 from the 2023 legislative session, and limit security deposits to one month’s rent statewide to reduce barriers, make rentals more attainable, and enhance housing affordability and stability for Vermonters.

D. Require Statewide Rental & Fair Housing Law Education for All Landlords

TO IMPROVE TENANT-LANDLORD COMMUNICATION AND COLLABORATIVE PROBLEM-SOLVING, ALL LANDLORDS SHOULD RECEIVE RENTAL AND FAIR HOUSING LAW AND BEST PRACTICES EDUCATION.

While very specific in some instances, much of tenant-landlord law is general and self-enforced. In a high-demand, low-supply market like Vermont, landlords have a disproportionate level of power within the tenant-landlord relationship. Often, the most vulnerable tenants are expected to educate and hold landlords accountable to the law. Landlords with a high degree of knowledge of both rights and responsibilities, as well as best practices in fair housing, are better positioned to support healthy tenant-landlord relationships.

We urge you to support a statewide requirement that all landlords must complete an approved rental and fair housing educational program.

E. Strengthen Protections and Standards in Manufactured Housing Communities (MHCs)

Residents in MHCs face specific challenges that require legislative attention:

- **Remove "+1%" From the Threshold for Triggering Mediation on MHC Lot Rent Increases.**

STRENGTHEN RESIDENT PROTECTIONS AGAINST EXCESSIVE LOT RENT INCREASES.

Current law allows mobile home park residents to trigger mediation if lot rent increases exceed the U.S. Consumer Price Index (CPI) for housing by more than one percentage point. This additional +1% threshold makes it harder for residents, especially seniors and others on fixed incomes, to challenge excessive rent hikes that their incomes can't keep up with.

The law already includes mechanisms that allow for justified rent increases, such as capital improvement surcharges, which must be documented and phased out once costs are recovered. By setting the threshold at the CPI, mediation could be triggered more readily, ensuring increases remain fair without placing unnecessary burdens on low-income and fixed-income residents.

We recommend removal of the "+1%" from the CPI threshold for triggering potential mediation for lot rent increases in 10 V.S.A. § 6252. This adjustment would enhance protections for vulnerable residents, including seniors and others on fixed incomes, by ensuring rent increases are reasonable and justified, thereby helping to maintain the affordability of mobile home parks in Vermont.

- **Clarify Lot Habitability Standards Regarding Erosion & Flooding**

CLARIFY LOT HABITABILITY REGARDING EROSION FROM WATER AND FLOODING TO ENSURE THE SAFETY OF RESIDENTS AND THE INTEGRITY OF THEIR HOMES.

Erosion and flooding threaten the habitability of mobile home park lots, causing unsafe living conditions, property damage, and financial instability for residents. Issues like unstable ground, sinkholes, and waterlogged lots can render homes uninhabitable, disproportionately impacting low-income residents who often lack the resources to address these problems. State law lacks clear standards for lot habitability related to erosion and water damage, creating enforcement gaps and uncertainty over the responsibilities of park owners versus residents.

This ambiguity places an undue burden on residents, leading to uneven enforcement and inconsistent protections. While some park owners address erosion proactively, others do not, resulting in varying living conditions across parks. Clearly defined responsibilities and standards would ensure park owners maintain safe, habitable lots and protect residents from erosion and flooding hazards.

We recommend that state law is updated to better define lot habitability concerning erosion and flooding, ensuring that park owner responsibilities are clearly established and consistently enforced to protect residents.

- **Set Minimum Potable Water Supply Standards During MHC Water Outages**

WE RECOMMEND AMENDING STATE STATUTE TO SET A CLEAR MINIMUM STANDARD FOR POTABLE WATER SUPPLY DURING PARK WATER FAILURES, ENSURING FAIR ACCESS AND PROTECTING RESIDENTS' HEALTH AND DIGNITY.

Residents in mobile home parks, including those in Pownal, often face inadequate water supply when park water systems fail. The current statute requires park owners to maintain safe and habitable conditions, including providing potable water, but it lacks specific guidelines on the amount of water that must be supplied during infrastructure failures. This ambiguity can result in residents receiving insufficient water, compromising their ability to meet basic daily needs such as drinking, cooking, and hygiene. Pownal has been a notable area where residents have struggled during lengthy water outages, highlighting the need for clearer and more equitable regulations.

We recommend adding specific language to 10 V.S.A. § 6262, requiring park owners to provide a minimum of 6 gallons of potable water per person per day during water system disruptions.

II. Preserving and Expanding Affordable Housing

Manufactured homes make up more than 7.2% of Vermont's housing units but are decreasing as a share of available housing. To address this:

A. Require Siting New MHCs Outside of Flood Zones

SITING NEW PARKS OUTSIDE OF FLOOD ZONES; PRIORITIZING REHOUSING THOSE DISPLACED IN PAST FLOODS.

Mobile home parks are a critical source of affordable housing in Vermont, with more than 7,000 households, but nearly a third of these communities have some land located within flood hazard areas, making them significantly more vulnerable to flooding than other housing types. Events like Tropical Storm Irene and the July floods of 2023 and 2024 have demonstrated this heightened risk, with mobile homes in parks experiencing nearly double the flood impact compared to mobile homes on private land and far exceeding the risk to single-family homes. These vulnerabilities, combined with the economic constraints of many residents, lead to increased displacement and housing instability during and following severe weather events.

With more than 7.2% of Vermont's housing units being mobile homes, it is essential to prioritize the development of new parks in safer locations outside flood zones. This approach will help prevent future displacements and provide secure housing options for Vermonters who have already been affected by past flooding.

We urge your support for policies and funding initiatives that require the siting of new MHCs in flood-safe areas and develop targeted housing solutions for rehousing individuals and families displaced by past flood events.

B. Reform Three-Acre Stormwater Rule Implementation

ENSURE ENVIRONMENTAL PROTECTION WHILE PRESERVING AFFORDABLE HOUSING COMMUNITIES.

Manufactured housing communities (MHCs) face disproportionate impacts from the three-acre stormwater rule due to their contiguous ownership structure, while similar density

neighborhoods with individual parcel ownership may avoid regulation. This creates an undue burden on affordable housing communities and their residents.

The current implementation structure raises equity concerns:

- MHCs are more likely to trigger the three-acre threshold due to ownership structure, even though significant portions of their impervious surfaces (resident-owned homes, driveways, etc.) would be excluded from regulation if located on individual parcels.
- When accounting for only park-owned infrastructure like roads and common areas, some MHCs may fall below the three-acre threshold
- Communities have limited financial capacity to meet compliance costs
- Infrastructure improvements may lead to increased rents for vulnerable residents
- Many affected communities are already struggling with aging infrastructure and flood risks

To address these challenges while maintaining environmental protection goals, we propose:

1. Immediate Actions:

- Establish categorical exemption for qualified MHCs from three-acre rule requirements
- Require Agency of Natural Resources to identify alternative phosphorus reduction sources to offset MHC exemptions
- Create a compliance credit system for properties that have already invested in improvements
- Establish longer implementation timelines for qualified affordable housing communities
- Establish a dedicated grant pool for MHC stormwater improvements

2. Long-Term Actions:

- Redesign regulatory programs to balance environmental goals with housing affordability, using an environmental justice framework to address systemic inequities and avoid disproportionate burdens on low-income communities.

We recommend amending the three-acre rule implementation to protect both our environment and our affordable housing communities through an equitable approach that recognizes the unique challenges faced by manufactured housing communities.

C. Allocate Funding for Feasibility Study & Infrastructure for Four New Manufactured Housing Communities

WHEN IT COMES TO OUR MOST CRITICAL FORM OF AFFORDABLE HOUSING IN VERMONT, WE NEED TO BETTER SUPPORT AND EXPAND MANUFACTURED HOUSING COMMUNITIES.

Manufactured homes make up more than 7.2% of all housing units in Vermont. They 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. Continued funding for mobile home repairs, water and septic infrastructure as well as flood resiliency is crucial to their preservation.

We also believe that 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.

We ask for your support in funding a feasibility study and infrastructure assessment for the development of 4 regional mobile home parks with a total of 600 Zero Energy Ready manufactured homes. This initiative will provide housing opportunities for individuals and families of mixed incomes, support a major homelessness rehousing and prevention effort, and expand access to affordable and sustainable housing options.

III. Strengthening Support Systems for Vulnerable Vermonters

To enhance support for vulnerable and underserved populations, we propose:

A. Provide Annual Capacity Funding for Statewide Vermont Tenants (VTT) Housing Coaching Services

TO ACHIEVE THE LONG-TERM SUSTAINABILITY OF HOUSING FOR ALL COMMUNITY MEMBERS, ALL PROSPECTIVE RENTERS NEED EQUITABLE ACCESS TO THE HOUSING SEARCH PROCESS.

Vermont's housing crisis is marked by escalating rents, a rental vacancy rate of 3.2%—below the healthy market range of 4-6% and a diminishing supply of affordable units, leaving many residents struggling to secure stable housing. Many prospective renters need one-on-one assistance to navigate the housing search process. Services may include help

with creating an email account, conducting online searches, contacting landlords, and overcoming barriers such as past convictions.

We are requesting \$75,000 to bring one additional staff member to the CVOEO Vermont Tenants team to strengthen our education and housing coaching services.

B. Provide \$400,000 Annual Funding for Statewide Mobile Home Resident Organizers

ADDITIONAL FUNDING SUPPORT IS NEEDED FOR MOBILE HOME RESIDENT ORGANIZERS.

Established in 1982, CVOEO's Mobile Home Program empowers mobile home residents through community organizing and education. Our team of three full-time staff operates a helpline that receives more than 800 calls annually. We assist communities with rent increase disputes and park sales, provide technical support on key state programs such as the MHIR program, and offer MHC rights education, guidance, and case management to help residents maintain their housing stability. Additionally, we participate in disaster response and recovery efforts, including the 2023 and 2024 flooding, and collaborate with the University of Vermont on emergency planning.

We are requesting \$400,000 annual funding to sustain four statewide, permanent mobile home resident organizer positions for the continued crucial support of this vulnerable population.

C. Renew and Increase Funding for the Statewide Asylum Seekers Assistance Program

INCREASED FUNDING IS ESSENTIAL TO ADDRESS THE GROWING NEEDS OF ASYLUM SEEKERS AND SUPPORT THEIR INTEGRATION INTO VERMONT'S WORKFORCE.

Vermont's immigrant population has more than doubled in the past two decades, growing from around 13,000 in the early 2000s (U.S. Census Bureau) to an estimated 28,000–32,000 in 2023 (American Immigration Council; National Immigrant Women's Advocacy Project). This rapid growth has placed increasing demands on service providers, particularly the Vermont Asylum Support Network, which operates the Statewide Asylum Seekers Assistance Program (SASAP).

Currently, most organizations serving asylum seekers are volunteer led, making it difficult to meet rising needs. Establishing paid staff capacity is crucial to ensure sustainable and high-quality support. This investment will help address the growing demands and ensure that asylum seekers receive the support they need to integrate successfully into Vermont communities and the workforce.

We are requesting a renewal and increase in SASAP funding to \$1,000,000, with \$500,000 allocated for direct services and program administration, and \$500,000 for hiring paid staff.

D. Support an "Office of New Americans" Equivalent with a Centralized Intake and Referral System

A CENTRALIZED SYSTEM IS NEEDED TO STREAMLINE LEGAL SERVICES FOR IMMIGRANTS AND SUPPORT SUCCESSFUL INTEGRATION.

As Vermont's immigrant population grows, asylum seekers face significant challenges accessing the legal support essential for their successful immigration journey as new members of our Vermont community. The current fragmented system leads to delays, confusion, and barriers to workforce participation, undermining socio-economic stability and growth.

An "Office of New Americans" equivalent with a centralized service intake and referral system would streamline access, reduce inefficiencies, and support immigrants' participation in Vermont's workforce and socio-economic systems.

We recommend supporting ongoing efforts to establish an 'Office of New Americans' equivalent, and we strongly urge the reprisal of Senator Martine Laroque Gulick's S.194 (2024) in the upcoming legislative session to advance research on the utility of ONAs.

E. Increase funding for the HOME Voucher Program for Families-\$2.4 million.

EXPAND THE HOME VOUCHER PROGRAM TO MEET VERMONT'S URGENT HOUSING NEEDS.

The HOME Family Housing Voucher provides rental assistance for 24 months with a possible extension through June 2026 and a security deposit for up to twice the value of one month's rent. The household is required to pay 30% of income towards housing costs and 100% at the end of the voucher period unless they have secured other rental assistance or

increased their income. Approximately 150 households have received up to 24 months of this voucher starting in 2023 and more than 60 families have been pre-approved but have not been able to find homes that meet their needs.

Given the state's limited number of federal vouchers and the ongoing challenges of securing housing in the current rental market, 50 vouchers should be added to the program and the length of time should be extended to 36 months per household to secure a bridge to a permanent voucher or until the family no longer needs financial support. Allowing new families to join the program would meet some of the remaining demand. (Approximately 255 households with children are currently in the General Assistance (GA) Emergency Housing Program.)

This program aims to provide greater stability and support for families as they work towards sustainable housing solutions ensuring that these households are not right back to where they started thus ending the vicious cycle of poverty and homelessness.

We urge you to support expanding funding for this crucial program to \$2.4 million, which will provide support for current participants and 50 additional families, stabilizing their housing.

Our Team is available to discuss these priorities and answer any questions you may have. Please do not hesitate to reach out for public testimony or clarity.

This Legislative Action Toolkit was created with key contributions from Ryan Gerrity, Lindsay Wenkouni Reid, Rebecca Dibble, Karin Ames, Sofia Benito Alston, and Mouad Rhahli.

Thank you,



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