

Mobile Home Program

Po Box 1603, Burlington VT 05402
802-660-3455 ext. 204/ mhp@cvoeo.org



Friday, March 28, 2025

Dear Honorable Senate Committee Chair and members:

Thank you for the opportunity to testify today and give you our perspectives on S.34 proposing to lower the allowable rate of increase for mobile home community lot rents.

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, information and referrals for people and organizations. 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. Our mission is to ensure that every Vermonter has equitable access to secure and maintain a safe and healthy home, free from discrimination and unnecessary barriers.

CVOEO MHP supports S. 34 as this bill strengthens protection and aligns with major CVOEO MHP values and mission. This change would empower residents to challenge any rent increase above inflation and have a significant impact, ensuring more affordability for residents. But S.34 will also have to be amended to meet the need for necessary rent increases often required for park improvement and infrastructure projects.

Since its creation in 1992, the CVOEO Mobile Home Program (MHP) has served as the only statewide mobile home park resident advocacy program in Vermont. Our work is always in partnership with residents, informing us of our programmatic and advocacy priorities.

Vermont law does not have a cap or limit on the amount a park owner can raise the rent, but when a rent increase is eligible for mediation [U.S. Consumer Price Index (CPI) + 1 %], leaseholders are allowed to dispute the increase through a petition requesting lot rent mediation. It must be signed by a majority of the park's leaseholders and filed with the park owner and the DHCD Commissioner within 15 business days of receiving the notice.

In 2024, the Agency of Commerce and Community Development (ACCD)* registered 238 parks with a mediation threshold of 6.7%. 153 parks increased their rent to an average of \$20.94 or 5.75 %. 14 parks increased rent over the mediation threshold but there is no mediation officially recorded. The 2025 mediation threshold decreased to 5.4%.

Because the U.S. Consumer Price Index (CPI) changes every year, the percent increase eligible for mediation also changes. The mediation threshold does empower residents to have a say in their lot rent increase process but our experience of providing support for residents going through the mediation process informs us that it is challenging for residents to organize themselves and get a petition together in time. Mediation provides a better understanding of why the rent increase is occurring but rarely sways the decision of park owners. Furthermore, in the current economic climate, a rent cap on lots would increase mobile home park residents' ability to remain housed. As we know, many residents are elderly and/or on a fixed income with exceptionally tight budgets. The rising costs of housing expenses make it increasingly difficult to adjust to rent increases.

Mobile Home Program

Po Box 1603, Burlington VT 05402
802-660-3455 ext. 204/ mhp@cvoeo.org



Ryan Gerrity, our Mobile Home Program Senior Resident Organizer, has the opportunity to collaborate closely with residents daily and support them during the mediation process. He will be detailing CVOEO MHP recommendations pertaining to S.34 as well as our perspectives related to flooding and natural disasters.

We welcome your questions and comments during our testimony.

CVOEO MHP Recommendations-Ryan Gerrity

Our recommendations are consistent with CVOEO's broader housing priorities. They are:

Support for Resident Protections

- The amendment to § 6252(a)(1) states: "A mobile home park owner shall not propose a lot rent increase of more than one percentage point above the U.S. Consumer Price Index for all Urban Consumers, Housing Component." This cap is a concrete step toward affordability.
- The change in § 6252(a)(2), removing the CPI +1% threshold for mediation and allowing disputes for any increase up to that cap, empowers residents to challenge potentially unreasonable hikes. This expansion is a win for residents' agency.

Incorporating Exceptions to the Cap

- The absolute cap in § 6252(a)(1) ("shall not propose" an increase above CPI +1%) might hinder specific cases that may be justified, especially considering resident owned communities. This rigidity could conflict with resident needs in such scenarios:
 - Creating a waiver request mechanism within § 6252, allowing park owners to seek exceptions for documented needs for special projects (infrastructure repairs, water improvement loans...) with defined criteria to maintain the bill's protective intent to balance flexibility with resident safeguards

Enhancing Resident Accessibility

- Per § 6252(a)(2), leaseholders must file a petition "within 15 business days after receipt by the Commissioner of the notice required pursuant to subsection 6251(a)" to trigger mediation. This timeline is restrictive, particularly for elderly residents even with our help:
 - Extending the timeline would give residents enough time to submit their petition.
 - Simplifying the process—electronic and phone filing options—to reduce barriers

Addressing Capacity Concerns

- The shift in § 6252(a)(2) to allow mediation for any disputed increase could significantly increase case volume and capacity needs for DHCD and CVOEO:
 - Ensuring capacity and resources funding for DHCD and CVOEO to support resident efforts

Mobile Home Program

Po Box 1603, Burlington VT 05402
802-660-3455 ext. 204/ mhp@cvoeo.org



S.34 related to Flooding and Natural Disasters due to Climate

During recent natural disaster events in Vermont, mobile home residents have faced additional financial hardships. While lot rent increases during disasters themselves may be rare due to timing constraints and regulatory limits, we have observed patterns where residents in Mobile Home Communities (MHCs) faced demands for rent payments despite their homes being uninhabitable. For example, Ran-Mar/HARR/Randy Rouleau, a well-known park owner, insisted on monthly lot rents being paid despite homes being flooded, possessions destroyed, households displaced. He justified this based on the water and wastewater infrastructure system that have not been affected by the floods. Some residents who could not pay August lot rent received non-payment notices.

Recommendations

- **Adding protection to S.34:** Pre-empting rate increases and payment in parks covered by a declared emergency to prevent additional financial burdens for homeowners, especially during efforts to recover from natural disasters.
- **Increasing capacity at CVOEO.** By investing in an expansion of CVOEO MHP' technical assistance services, we would ensure that current and forthcoming state resources are brought the last mile to vulnerable mobile communities and provide support efforts locally ensuring effective support and dissemination of information.
- **Funding a mobile home statute legal specialist position at DHCD:** This position will provide legal counsel to mobile homeowners. Additionally, our state housing network will be stronger by creating pathways within the authority of oversight agencies to ensure park residents receive legal support in a timely fashion and that enforcement measures are effectively enacted. This would streamline the process and alleviate financial stress.

We believe that continued action over the coming years is required to tend to the crucial needs and challenges affecting the lives, health, safety, and wellbeing of mobile home residents and invest in maintaining and expanding this important affordable housing source.

Thank you for your attention,

Sandrine Kibuey, CVOEO HAP Director- skibuey@cvoeo.org

Ryan Gerrity, CVOEO MHP Senior Resident Organizer- rgerrity@cvoeo.org