

**COMMONWEALTH OF MASSACHUSETTS
MANUFACTURED HOMES COMMISSION**

Public Meeting Minutes

Meeting of April 21, 2026

Members Present:

Ethan Mascoop, Chair
Paula Fay
Jeffrey W. Hallahan
Sandra L. Overlock
Oliver L. Stark

Members Absent:

Ellen Peterson

Others Present:

Mercy Cover, Assistant Attorney General, Office of the Attorney General
Mary O'Hara, Burlington Associates in Community Development LLC

Call to Order: The Chair, Commissioner Mascoop, convened the virtual public meeting via Zoom at 10:31 a.m.

The Chair called the meeting to order, starting with a roll call. A quorum was established.

Meeting Minutes: The Commission voted to adopt the minutes of the Commission meeting held on March 18, 2026.

Annual Reports: The Commission voted to adopt the annual reports for Fiscal years 2021 and 2022.¹ The Commission voted to authorize Commissioner Stark to effectuate report submissions required by G.L. c. 6, § 108.

Legislative Updates: The Commission continued its discussion regarding Senate Bill No. 2828 and offered feedback on the comment letter drafted by the Chair, which the Commission authorized the Chair to submit at its last public meeting. The Chair agreed to incorporate feedback from this meeting into a final draft prior to submission.

Discussion of Modular vs. Manufactured Homes: The Commission discussed the ROAD to Housing Act of 2025, pending federal housing legislation that would, among other things, change the federal definition of manufactured housing to remove the requirement that such housing be built on a chassis. Allowing the chassis to be removed may facilitate a greater range of design and siting options for manufactured homes, such as basements or multiple stories; though it raises questions about distinctions between manufactured homes and other types of factory-built homes, such as modular homes.

¹ Prior to the vote, the Chair requested a modification to the FY2021 report to change a reference from Boston College to Boston University.

Mary O'Hara of Burlington Associates joined the Commission and members of the public in a discussion regarding the differences between manufactured housing and modular housing. Issues discussed included differences in financing, taxation, insurance, and construction standards. There are no standard mortgage options for manufactured housing, which is considered personal property not real estate. For that reason, manufactured housing is subject to excise tax, rather than property tax. Construction standards for manufactured housing are set at the federal level, while modular construction standards are subject to a municipality's zoning and other local standards.

The main issue discussed was that there may not be a clear distinction between manufactured and modular housing if the federal legislation becomes law. Commissioner Overlock reported that Senator Warren has introduced language amending the legislation to keep the definition of manufactured housing for taxation and other purposes. The language is as follows:

Manufactured home certifications.—

“(1) IN GENERAL.—

“(A) INITIAL CERTIFICATION.—Subject to subparagraph (B), not later than 1 year after the date of enactment of the 21st Century ROAD to Housing Act, a State shall submit to the Secretary an initial certification that the laws and regulations of the State—

“(i) treat any manufactured home in parity with a manufactured home (as defined and regulated by the State); and

“(ii) subject a manufactured home without a permanent chassis to the same laws and regulations of the State as a manufactured home built on a permanent chassis, including with respect to financing, title, insurance, manufacture, sale, taxes, transportation, installation, and other areas as the Secretary determines, after consultation with and approval by the consensus committee, are necessary to give effect to the purpose of this section.

Scheduling: The Commission agreed to hold its next quarterly meeting in hybrid format via Zoom and with an in-person option in Chicopee City Hall on July 21, 2026, from 10:30 a.m. to 12:30 p.m.

For its next meeting, the Chair reported that the Commission will invite representatives from Citizens' Housing & Planning Association (CHAPA) to continue discussing the ROAD to Housing Act of 2025. The Commission also intends to continue its prior discussions regarding insurance, and, if passed, the effects of Senate Bill No. 2828.

The Chair adjourned the public meeting at 12:13 p.m.

List of Documents Used by the Commission at the Public Meeting

1. Agenda
2. The Chair's draft comment letter in response to Senate Bill 2828.

The above minutes were presented to the Manufactured Homes Commission and adopted by a majority of members present at the Commission's meeting on July 21, 2026.

Oliver L. Stark
Oliver L. Stark, Secretary
Manufactured Homes Commission