

**COMMONWEALTH OF MASSACHUSETTS  
MANUFACTURED HOMES COMMISSION**

**Public Meeting Minutes**

**Meeting of March 5, 2026**

**Members Present:**

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

**Members Absent:**

N/A

**Others Present:**

Nora Gosselin, Director of Resident Acquisitions, Cooperative Development Institute  
JaiKaur Leblanc, professional mediator  
Fedrick Blemur, student, Boston University School of Public Health  
Grace Fairchild, student, Boston University School of Public Health

**Call to Order:** The Chair, Commissioner Mascoop, convened the virtual public meeting via Zoom at 1:00 p.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 February 11, 2026.

**Annual Reports:** The Commission voted to approve the annual reports for fiscal years 2023, 2024, and 2025. The Commission voted to authorize Commissioner Stark to take necessary action to file the annual reports pursuant to G.L. c. 6, § 108.

**Legislative Updates:** The Commission continued its discussion regarding Senate Bill No. 2828. Because the bill, if passed, would create a dispute resolution body in place of the current Commission, the Chair invited JaiKaur Leblanc, a professional mediator, to discuss the purpose, process, and outcomes of mediation, including training requirements for public mediation. In essence, the bill envisions Commission mediators taking on more of the role of an arbitrator; rather than supporting the parties in reaching their own agreement, the mediator, pursuant to the bill, would make a finding for one party, with the aggrieved party having the right to seek appeal before the Commission, which would then be appealable to court pursuant to G.L. c. 30A.

Fedrick Blemur, a policy student at Boston University, presented a comparison of Senate Bill 2828 and a similar dispute resolution statute in the state of Washington. Additionally, Grace Fairchild, another Boston University student, presented an overview of the bill,

summarizing each of the sections and offering an opinion on whether they should be supported or opposed. Both students' presentations are attached to these minutes below.

The Commission continued discussing issues it saw with the proposed dispute resolution process, including whether the dispute resolution body's decisions would have binding or precedential value as it relates to other cases that come before it, and whether the trust fund would fully cover the expenses of mediation. Concerns were also raised regarding the financial burden that an annual \$25 per-unit licensing fee would have on parks, particularly those that are owned cooperatively. The Commission also discussed the potential purpose and effect of the bill's proposed change to the definition of "manufactured home," in G.L. c. 140, § 32Q, that would remove the language "built in conformance to the National Manufactured Home Construction and Safety Standards."

The Commission discussed whether it should vote to support the bill, oppose the bill, or support and oppose specific sections of the bill. It was generally agreed that the Commission would prefer to express support for portions of the bill while rejecting the rest. The Chair proposed that a vote could result in a position paper or talking points for each section so that individual Commissioners would have the ability to advocate for either the acceptance or rejection of those sections. The Chair expressed concern that there may not be any particular person to address a letter to, since it does not appear there will be any further hearings on the bill. Commissioner Stark suggested a letter could be addressed to the bill's sponsors and noted that it would be preferable for the Commission to speak with one unified voice in a letter, rather than permitting individual Commissioners to speak on the Commission's behalf. Due to time constraints, the Commission deferred its vote and scheduled another special meeting to identify which portions it would support and oppose.

**Scheduling:** The Commission agreed to hold a further special meeting virtually via Zoom on March 18, 2026.

The Chair adjourned the public meeting at 3:19 p.m.

#### **List of Documents Used by the Commission at the Public Meeting**

1. Agenda
2. Draft minutes of the meeting held on February 11, 2026.
3. Presentations: *Dispute Resolution Process Comparison*, Fedrick Blemur, Boston University (March 5, 2026); *Summary of the Manufactured Housing Commission's Perspectives on Senate Bill 2828*, Grace Fairchild, Boston University (March 5, 2026).

*The above minutes were presented to the Manufactured Homes Commission and adopted by a majority of members present at the Commission's meeting on March 18, 2026.*

  
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Oliver L. Stark, Secretary  
Manufactured Homes Commission

## Massachusetts Dispute Resolution Process (Bill S.2828)

1. Dispute Arises in Manufactured Housing Community (Resident, Owner, Operator)

2. Complaint Filed with Attorney General (AG)

3. AG Reviews Complaint (May Enforce Directly or Refer to Commission)

4. If Referred → Commission Assigns Mediator

5. Mediation Conducted (Mediator Reviews Evidence & Facilitates Resolution)

6A. Agreement Reached → Written Settlement → Case Ends

6B. No Agreement → Written Request for Commission Hearing (Within 30 Days, \$25 Fee)

7. 3-member commission hearing

8. Written Decision Within 45 Days (Corrective Action Ordered if Violation Found)

## Washington Dispute Resolution Process (Chapter 59.30 RCW)

1. Aggrieved Party Files Complaint with Attorney General (Alleged Violation of Ch. 59.20 RCW)

2. AG Provides Initial Guidance (Notice Requirements & Time to Cure)

3. AG Initiates Investigation & May Facilitate Negotiation

4. Parties Must Cooperate (Subpoenas, Documents, Facility Access)

5A. If Violation Found → Notice of Violation Issued (Certified Mail)

5B. If No Violation → Notice of Non-Violation Issued

6. 15 Business Days to Correct Violation (Unless Hearing Requested)

8. Right to Administrative Hearing (Within 15 Business Days)

9. ALJ Conducts Hearing → Written Order Within 30 Days

10. Final Order May Be Appealed to Superior Court

## Summary of the Manufactured Housing Commission’s Perspectives on Senate Bill 2828

The table is organized chronologically by bill section. Each issue with the bill is noted and prioritized separately. The high priority issues are highlighted. The far right column indicates a recommendation of whether the section of the bill should be removed, unchanged, or revised, based on the noted issues. Rows with green text denote the sections of the bill that this commission finds acceptable. This review has been done with the intention of prioritizing and protecting the rights of manufactured home residents and park owners.

Bill SECTION	Summary of Change	Priority Level of Issue	Issue Explained	Recommendation
1	Commission Member and Responsibilities	High	Change in membership from community oriented/advisory to lawyer oriented/dispute resolution	Retain existing statutes. Remove from bill.
		High	Extreme narrowing of scope. Removing language about role of making recommendations/advisory in general and specifically making zoning and taxation proposals.	
		High	Removed language explaining the mission and ethos of the committee.	
		High	Currently the annual report is a qualitative summary and a pathway for the commission to relay its recommendations. The bill changes the annual report to be only a financial summary.	
2	Rent Control Boards Training	Med	The Executive Office Housing and Livable Communities or a designee will establish the training program. No advisory role for commission.	The current commission should advise in the development of the training program.
3	Manufactured Housing Trust Fund	High	Is it sufficient funding to pay three lawyers? If not, then remediation would halt? Other uses of funds – support for legal representation for parties in mediation, training for LBOH, assistance programs for vulnerable residents, etc.	Retain existing statutes. Remove from bill.
4	Role of Rent Control Boards	Low	Bill is vague about "fair[ness]" and open for interpretation and abuse.	No change to bill
5	Preemption of Role of Rent Control Boards	None	No issue because it gives allowance to the Rent Control Board.	No change to bill
6-7	Licensing Fees	Med	Licensing fees are going from community-level to lot-level and therefore is much more expensive for resident.	Retain existing statutes. Remove from bill.

8	BOH can suspend Licenses	High	Does not consider BOH authority to restrict, modify or place conditions on licenses.	Retain existing statutes. Remove from bill.
9	80/20 Allocation of Licensing Fee Funds	Low	Strongly favors Trust fund over municipal.	Retain existing statutes. Remove from bill.
10	No restriction on resident purchase sources	None	No issue because protects the residents' autonomy.	No change to bill
11	Updated Rules from Community Owners	None	No issue because provides residents more advanced notice or changes.	No change to bill
12	Administrative change from words to numbers	None	No issue	No change to bill
13	Implementation of revised rules	None	No issue because changes to require the rule to be approved prior to action being taken.	No change to bill
14	Change of use or discontinuance permits	Med	Vague description of which office will issue these permits. Should state BOH explicitly.	Retain existing statutes. Remove from bill.
15	Change of use or Discontinuance Notification	Med	No longer including changes of use or discontinuance that do not require govt approval.	Retain existing statutes. Remove from bill.
16	Updated AG approval of rule changes to be issued		No issue	No change to bill
17	Updated definition for manufactured homes	High	Removal of definition is not justified or explained. It may allow for the inclusion of modular housing in the parks. Issues and concerns include zoning, building installation, property values and investor incentives. May increase threat of evictions or loss of homes for current residents.	Retain existing statutes. Remove from bill.
18	Sale of Community	Med	Allowing community members to buy a community. Language is inconsistent. Residents should have 60 days to respond to sale notice. Reasonable evidence not defined adequately. Protections necessary regarding purchase prices, insurance, and deposits.	See CDI comments.
19	Administrative change from words to numbers	None	No issue	No change to bill

20	Dispute Resolution	High	Assume all complaints pertain to violation of existing laws and regulations which is not the nature of all complaints received. Historically complaints include unaddressed complaints to park owners, unfair treatment or rent, park owner acting outside of their abilities outlined in the statute, systemic issues).	Retain existing statutes. Remove from bill.
		High	The AG's office can be the sole reviewer of all complaints, in which case the expertise of the Commission and Rent Control Boards would not be utilized.	
		High	Silent on when the AG's office will allocate the case to the Housing Commission.	
		High	The commission members (ie lawyers) selection and qualification does not require mediation training. A Housing Commission of lawyers will likely aim to arrive at a decision of right versus wrong. A Housing Commission of lawyers will likely not be skilled in mediating, where all parties are ultimately supposed to come to an agreement.	
		High	Does not state if the new Commission has the ability to request subpoenas or inspections.	
		High	Does not explain how new statutes would be enforced. Does not state if the new Commission has enforcement power.	
		High	Commission member alternates (ie the community member and owner) are not allowed to be mediators that review cases.	
		High	The filer cannot request an appeal. The case can go to court but the AG's office has to approve it going to court.	
		High	Lack of legal representation for residents.	
		High	No language on whether decisions about cases would act as precedents for future cases.	
21	Municipal Water Rates	High	Conflicts with state sanitary code and not sure if in compliance with federal code. Does not say that billing rate has to be below standard. To discuss further.	Retain existing statutes. Remove from bill.
22	Transition to New Commission	High	See above comments	
23	Commission for Insurance	None	No issue – to confirm	No change to bill – to confirm