

Manufactured Homes Commission
Minutes of Meeting Held On
January 18, 2022 at 10:30 am¹

CALL TO ORDER: 10:35 am

In Attendance: Sandy Overlock, Jeff Hallahan, Kathy Zorotheos, Tracy Sharkey, Ethan Mascoop, Dan Less and Matthew Johnson from AGO, Chris Jee and Thomas Barry from DHCD.

APPROVAL OF MINUTES

Motion to approve July and October 2021 minutes by: Ethan Mascoop

Seconded by: Tracy Sharkey

Discussion: None.

All in favor: 6

Abstain: 1

CORRESPONDENCE/COMMUNICATIONS

No correspondence.

OLD BUSINESS

Geri Medina, one of the two students working with Mr. Mascoop, presented on COVID-19 vaccinations.² Manufactured home communities are a vulnerable population when it comes to vaccinations due to factors such as accessibility and age. Given there is no specific data on MHCs, Ms. Medina suggests DPH use existing data on age, disability, accessibility to existing vaccination sites, and vaccination rate to determine which MHCs to prioritize for mobile vaccine clinics. Ms. Medina would propose prioritizing MHCs in Westfield, Russell, Warren, and Wales due to lower vaccination rates and Oxford, Carver, and Pepperell due to the presence of multiple MHCs.

Mr. Less asked Ms. Medina whether this issue is specific to MHCs as opposed to rural communities in general and whether she came across any outreach efforts to these communities during her research. One issue in identifying MHCs to target is that we do not know whether the vaccination rate for a given community reflects the rate of an MHC within it. Some municipalities offer in-home vaccination by request, but there does not appear to be any proactive outreach to MHCs. Mr. Mascoop mentioned speaking with a MHC resident who

¹ The meeting was held remotely pursuant to An Act Extending Certain COVID-19 Measures Adopted During the State of Emergency (<https://www.mass.gov/service-details/updated-guidance-on-holding-meetings-pursuant-to-the-act-extending-certain-covid-19-measures>). The public could participate remotely through video or telephone.

² Ms. Medina's presentation included a deck a copy of which has been retained, attached to these minutes, and labelled Exhibit A.

indicated their entire community is vaccinated, but due to the prevalence of breakthrough cases, their community may be interested in a booster clinic.

Max Miller, the other student working with Mr. Mascoop, presented on climate induced flooding and ecological hazards in MHCs.³ 29 MHCs are within the FEMA 1% annual flooding zones, in block groups with a median age of home built before 1976, and in block groups with >14% of households with people 65 and older. 23 MHCs are within 1 mile of a 21E Site, Solid Waste site, and Toxic Release Inventory site. 4 of those are also within 1 mile of a Superfund site.

Mr. Gee asked what risks residents face who are within 1 mile of these hazard sites. Mr. Miller said he is not sure about the health risks since the research was focused on proximity to these sights not the effects. Mr. Mascoop added that as these sites are remediated, communities are supposed to be involved. Kasey Kidd asked whether her community being in 2-mile proximity to another community within 1 mile of the hazard zones impacts them and whether DEP would look into their risk level. Mr. Mascoop responded that the local BOH would be the first contact to try. Ava (*last name unintelligible*) asked why her community which abuts another community that was listed as being within a mile of the sites was not included. Mr. Miller responded that her community may be just over the 1-mile mark.

NEW BUSINESS

Ms. Sharkey received a letter from DPH, which was posted to their website, confirming that local boards of health do have jurisdiction over health issues in MHCs. This will be helpful when BOHs claim they do not have that authority. Ms. Sharkey asked whether DHCD and AGO can request park size numbers when owners submit rules for review. Mr. Less said he would need to look into the statute, but they may be able to ask for park capacity or number of units. They would only be able to require it going forward with new rules if they can request this information with new rules. Ms. Overlock mentioned that owners must provide the names of their residents to local BOHs with their monthly license fee. Ms. Sharkey proposed asking DPH to send the letter to all BOHs as a courtesy. Mr. Mascoop mentioned that DPH does not actually have the regulatory authority to tell the BOHs what to do, and the regulatory mechanism when BOHs refuse to respond is for complainants to appeal to the court. He also brought up that DPH has been working on revising the state sanitary code since 1999 and perhaps the commission could make recommendations since the old code does not reflect the current state of MHCs. Mr. Less said he would look into whether the commission could legally make those recommendations. Ms. Sharkey suggested coming up with the top three issues to raise, and Mr. Less suggested inviting someone from DPH to meet with the commission maybe even at each quarterly meeting.

OPEN FORUM

Mike Zupkofska from Leisure Woods commented that Leisure Woods should be on the list of MHCs within a mile of a hazard zone. He also asked about an age verification statement he received from Hometown America, which he feels uncomfortable filling out as he has previously

³ Mr. Miller's presentation included a deck a copy of which has been retained, attached to these minutes, and labelled Exhibit B.

provided this information. Mr. Less suggested filing a complaint with the AGO if he has concerns.

Bob Jaruse from Leisurewoods mentioned that Hometown America may be looking to increase rents and asked whether commissioners should sit in on meetings with them since there was a lawsuit against them from another community. Ms. Sharkey clarified that the commission is not involved in rent increases and that the rent control board for the community would look at that issue.

Kasey Kidd confirmed that Hometown America's community Leisurewoods wants to have a conversation about a petition for a rent increase. She was under the impression that each park should have one rent rate. Mr. Less clarified that it depends on when a resident joined the community and which class they are in. Mr. Jee added that the SJC's recent decision in *Blake v. HTA* was fact specific and applies to residents within the similar classes. Ms. Kidd reiterated that it is a major problem that the BOHs refuse to acknowledge the MHCs, and the residents feel left behind.

Ms. Sharkey asked again for the top three issues people are seeing in MHCs. Ms. Sharkey mentioned she is hearing about driveway and septic maintenance. Mr. Mascoop mentioned hoarding as another issue. Mr. Jee raised installation standards as well.

MOTION TO ADJOURN at 12:44 pm by: Dan Less

Seconded by: Ethan Mascoop

Discussion: None

All in favor: Unanimous

Prioritizing manufactured home
communities for Department of
Public Health (DPH) mobile
covid-19 vaccine clinics in
Massachusetts

Presenter: Geri Medina

Image source: Google Images



Manufactured Home Communities: Vulnerable Population

- Accessibility
 - Rural
 - Lack of public transportation
- Age 55+ communities
 - Underlying health conditions
- Higher prevalence of chronic conditions (AI Rousan et. al., 2015)
 - Disabilities
- Covid-19 vaccination coverage lower in rural counties,
among adults 18-64 years old, and those aged 65+ (CDC, 2021)

What are some criteria that MA DPH can utilize to determine which manufactured homes communities to prioritize for mobile covid-19 vaccination clinics in the absence of specific population data ?

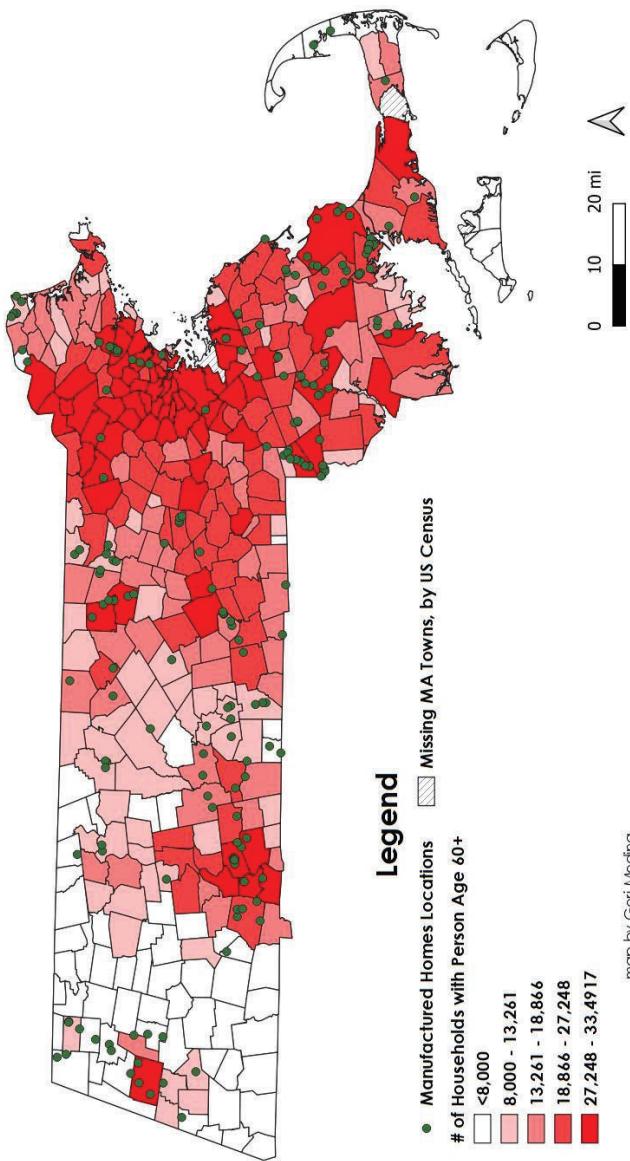
CRITERIA	DATA TO COLLECT/USE
Age	Number of households with a person age 60+
Disability	Percent of the population with an ambulatory disability
Accessibility	Walking and driving access to a covid-19 vaccination site
Vaccination Rate	Percent of the population with at least 1 dose of a covid-19 vaccine

Datasets to generate maps included:

- US Census - American Community Survey (ACS) (2019)
 - MA Population and town data, shapefiles
- Homeland Security Infrastructure Program (2018)
 - Coordinates for MA manufactured homes locations, reprojected to USGIR's GISCorps (2021)
- MA Department of Public Health (2021)
 - Coordinates for MA Covid-19 vaccination sites, reprojected to MA Covid-19 vaccination rates by town

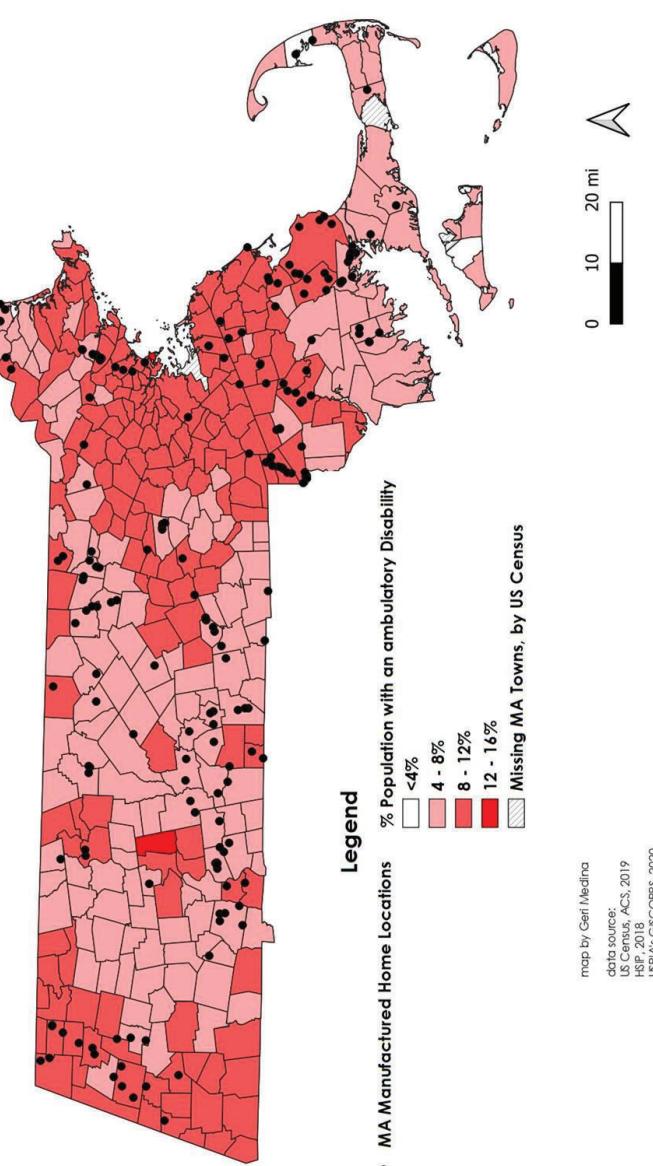
Age

Number of Households with one person age 60+ by town & location of manufactured homes in Massachusetts, 2019



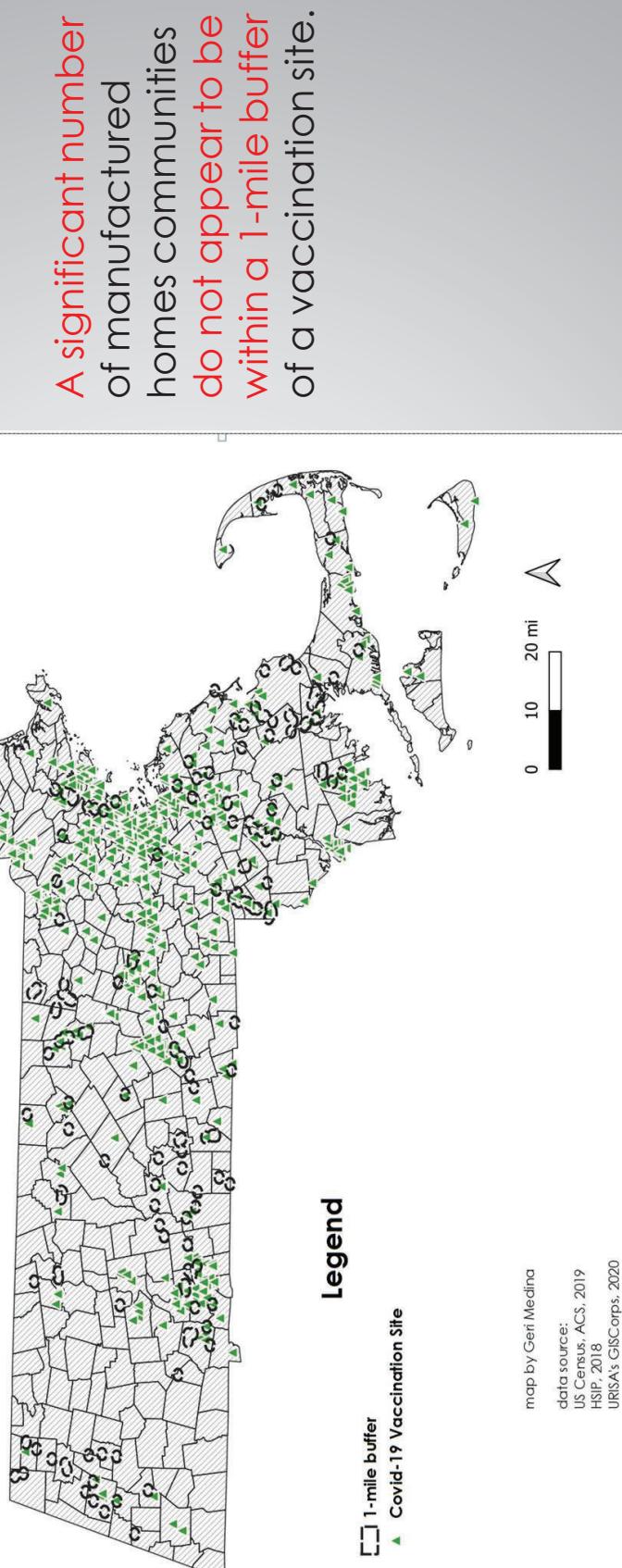
Disability

Percent of the Population with an Ambulatory Disability by towns in MA & Location of Manufactured Homes Communities, 2019



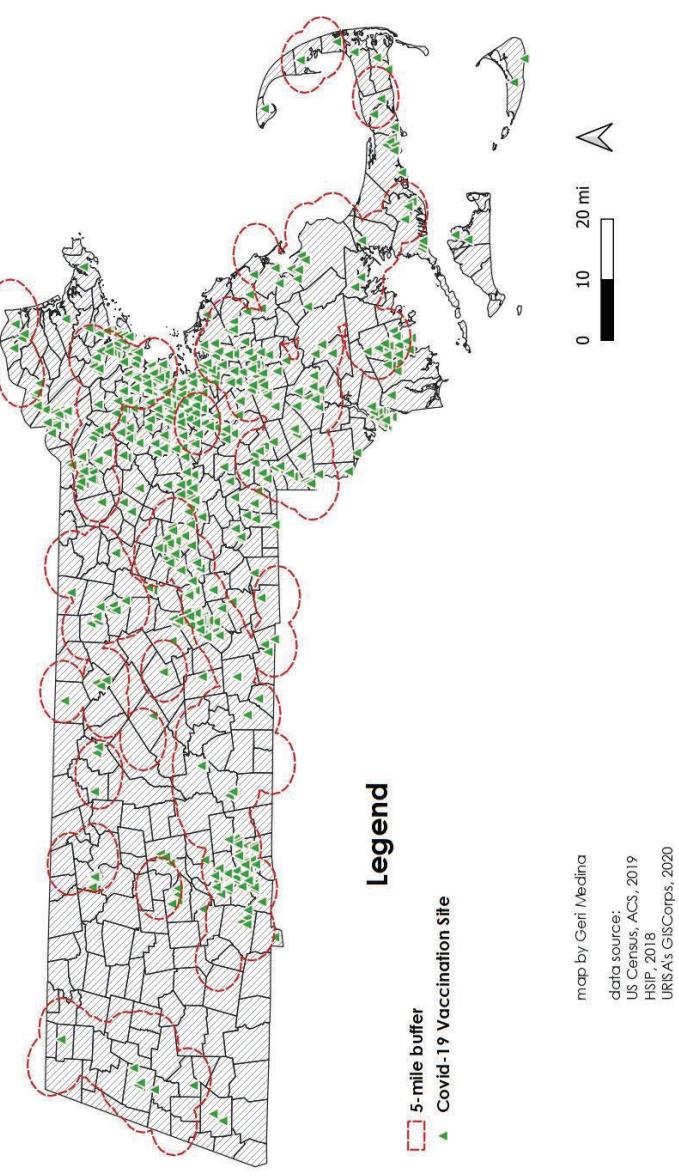
Accessibility

Location of covid-19 vaccination sites within a 1-mile buffer from manufactured homes communities in MA, 2021



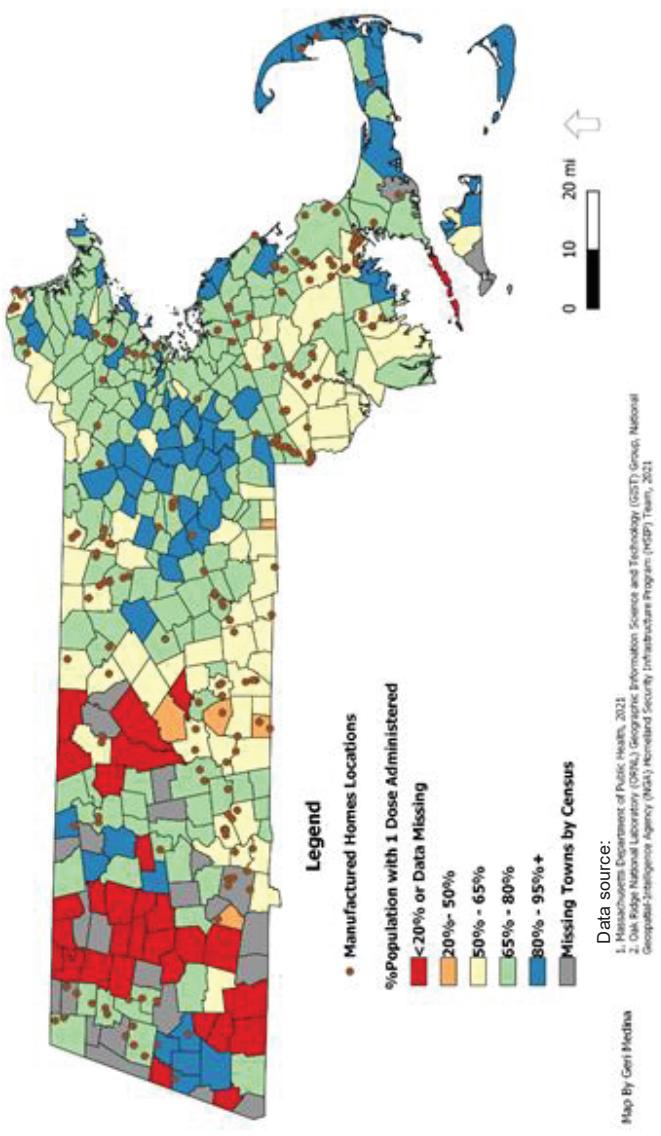
Accessibility

Location of covid-19 vaccination sites within a 5-mile buffer from manufactured homes communities in MA, 2021



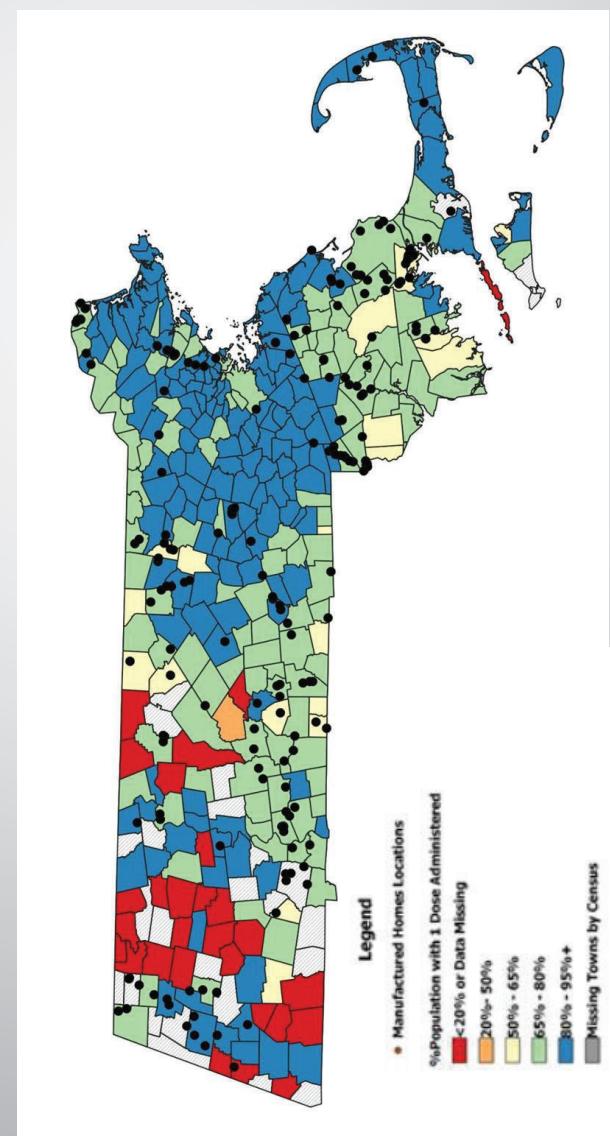
Vaccination Rate

Percent of the Population that has received 1 Dose of the Covid-19 Vaccine and Location of Manufactured Homes in Massachusetts in 2021



Percent of the population that has received at least one dose of the COVID-19 vaccine and the location of manufactured homes in MA
as of January 16th, 2022

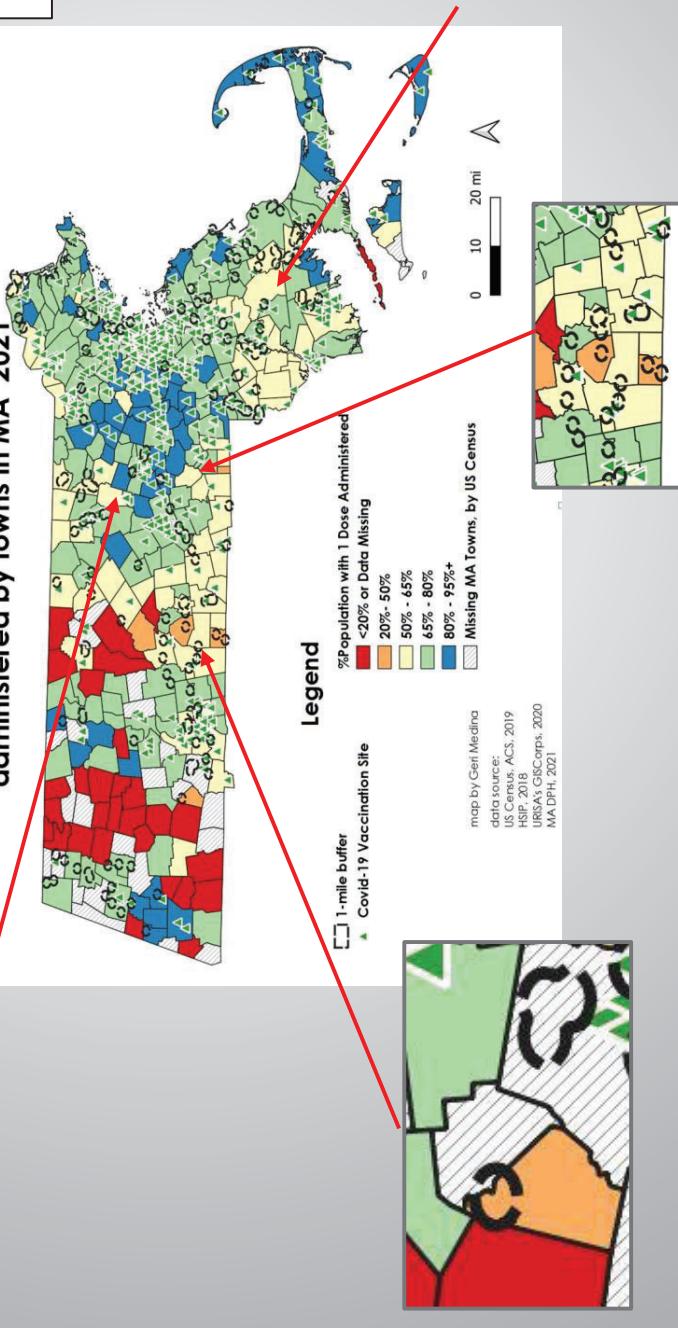
Several manufactured homes communities are still within towns where the percent of the population that has received at least 1 dose is under 77%, and under the current overall vaccination rate of 93% (as of 01/16/2022).



Prioritization

Zoomed in:
Communities with no vaccination sites within walking distance & are in towns with lower vaccination rates

Location of covid-19 vaccination sites within a 1-mile buffer from manufactured homes communities & Percent of the population with at least 1 covid-19 vaccine dose administered by towns in MA 2021



Summary

Manufactured homes communities that MA DPH can prioritize for covid-19 vaccine clinics based on age, disability, accessibility, and covid-19 vaccination rates.

Towns where communities to prioritize are located:
Westfield
Russell
Warren
Wales
Oxford
Carver
Pepperell

Limitations

- Missing specific population and health data for this population
- ACS/ Census data: collected every 5 years, only uses only a 12.5% sample population
- Dynamic vaccine and vaccine site data: quickly evolving datasets
- 1-mile and 5-mile buffer distances used for accessibility may still be inaccessible for population
- Vaccination rates are unknown for specific population; may be over or under- estimating rates based on town data
- Potential for vaccine hesitancy among population, as observed among other vulnerable populations

Climate Induced Flooding & Ecological Hazards in MA Manufactured Housing Communities

Max Miller
MHC Commission Quarterly Meeting
1/18/22

Why is manufactured housing important to study?

→ Largest source of unsubsidized affordable housing in the US

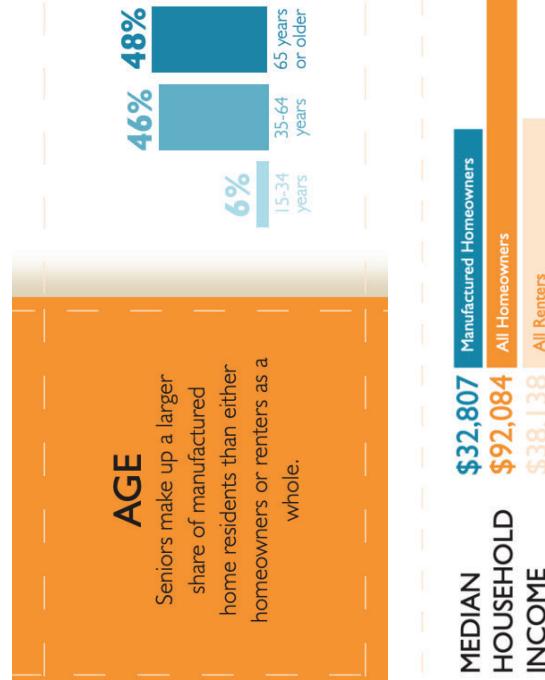
→ ~35,000 people in MA

→ Land-lease model

→ Financing

→ Immobility

→ Zoning



Research questions

1. Which MHCs are most vulnerable to the impacts of climate change induced flooding?
 - a) FEMA flood hazard map: 1% annual flooding zones
 - b) Median age of Home Built: prior to 1976
 - c) Percentage of Household with Person Older than 65: above 14%

2. Which MHCs are most exposed to various ecological hazards?
 - a) EPA NPL Superfund sites (current/active)
 - b) State Superfund sites: Chapter 21E Sites (Tier I)
 - c) Solid Waste Diversion and Disposal Sites
 - d) Toxic Release Inventory Sites

Data Sources

Demographic Data

State Government Website

→ MHC List

Environmental Data

MassGIS

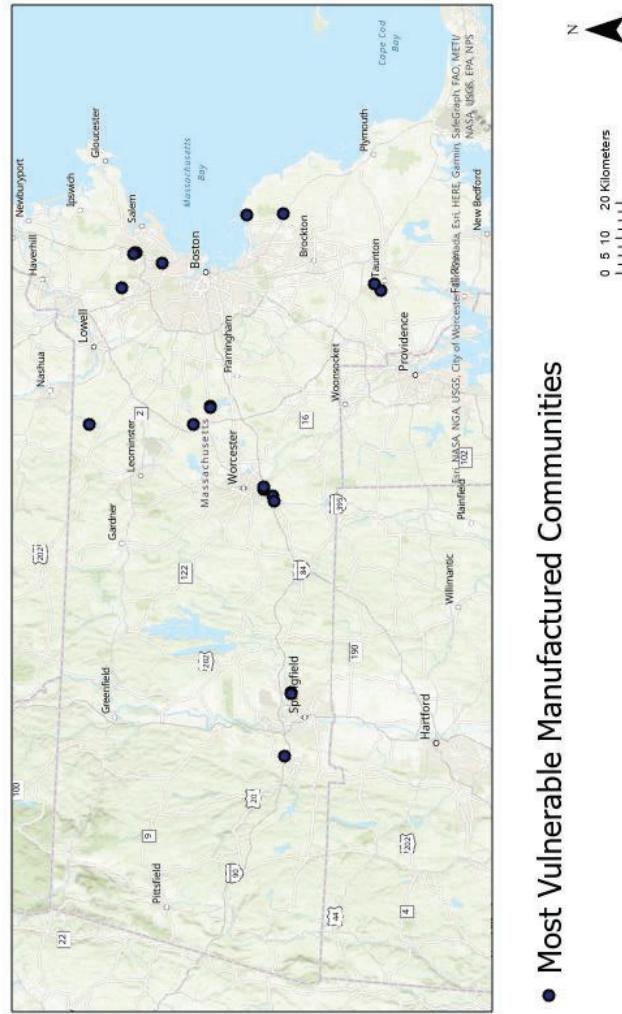
- FEMA flood hazard layer for MA
- Chapter 21E Sites
- Solid Waste Diversion & Disposal Sites
- EPA
 - Toxic Release Inventory Sites
- SEDAC
 - Superfund National Priority List Sites

Results & Maps: Most Vulnerable Communities to Flooding

Massachusetts summary

→ 247 communities in total

Most Vulnerable Manufactured Housing Communities in Massachusetts based on Flooding Risks, Median Age of House Built, and Percentage of Household with People aged over 65



After exploring various demographic variables and risks

→ 126 communities within 1% annual flooding zones

→ 56 communities with homes built before 1976

→ 29 communities with >14% households with a person older than 65

- Most Vulnerable Manufactured Communities

Ecological Hazard Analysis

Superfund Sites (EPA NPL) → 500m Buffer recommended by EPA

Select by attribute: in MA, current/active = 31 sites

Chapter 21E Sites (State Superfund) → 250m Buffer

Select by attribute: Tier I Hazardous Waste Sites = 1,060 sites

- * Severity weighting for C21E,
SW and TRI buffers from
Ecological Hazard report from
Northeastern

Solid Waste Diversion and Disposal Sites → 150m Buffer

664 sites

Toxic Release Inventory → 100m Buffer

Geocoded addresses, re-matched low-scoring or unmatched addresses (11) = 895 sites

Results & Maps: Exposure to Ecological Hazards

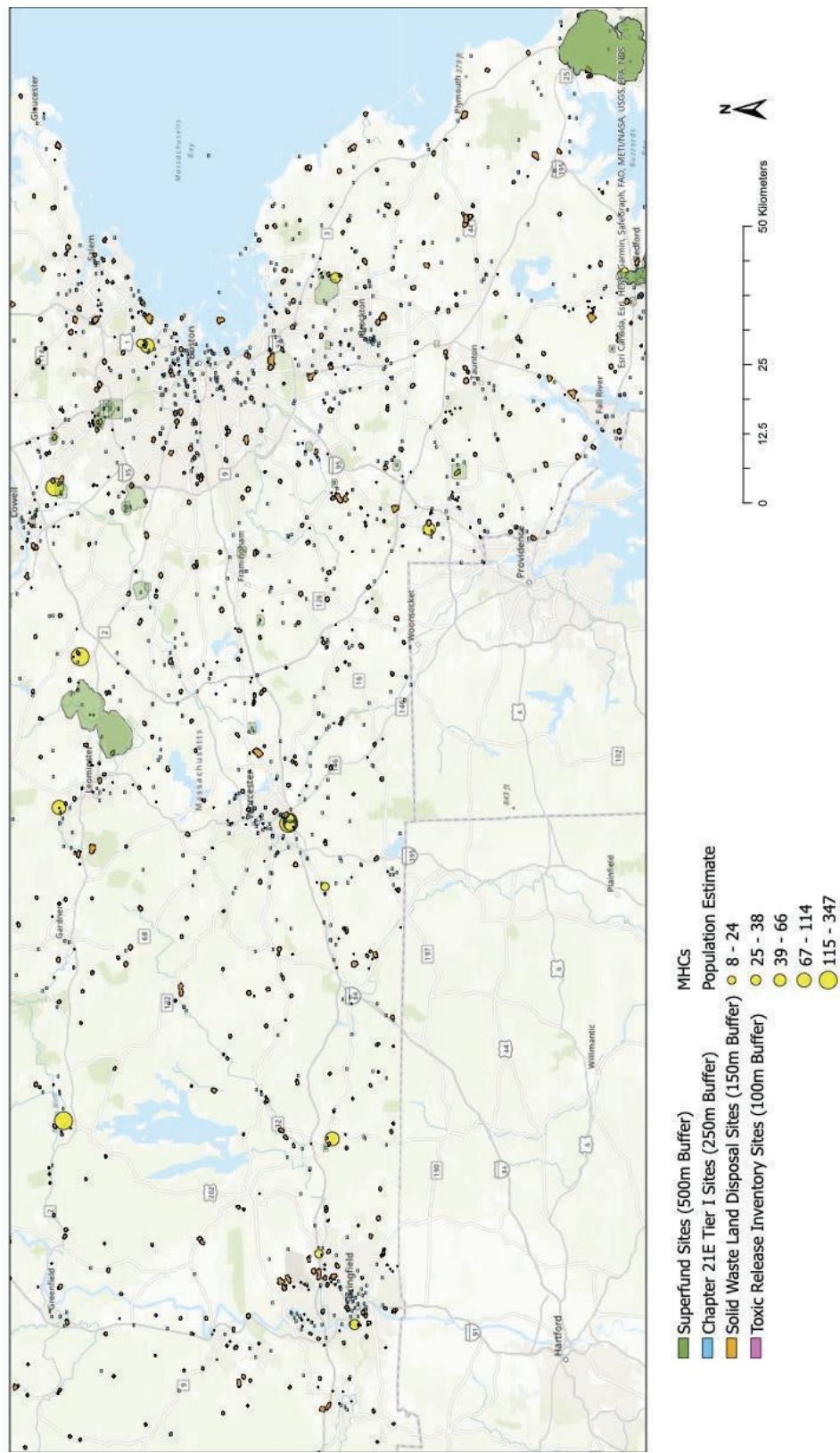
Identifying at-risk MHCS
**→ 23 MHCS within 1 mile of
 21E Site, Solid Waste site & TRI
 site**

MHC Name	Address	Town	Zip Code	Number of Sites	Population Estimate	Co-op
1 Bay State Mobile Home Park and Sales	43 South Main Street	Acushnet	2743	16	24	No
2 Oak Hill Manufactured Housing Community	113 Washington Street	Auburn	2743	35	53	No
3 Winbrook Acres Cooperative Cooperation	120 Washington Street	Auburn	2743	102	153	No
4 Mara Vista Trailer Park	131 Washington Street	Auburn	2743	19	29	No
5 Mobile Home Service Center, Inc.	17 Washington Street	Auburn	2743	25	38	No
6 Whispering Pine Estates	47 Washington Street	Auburn	2743	53	80	No
7 Mary's Mobile Home Park	3 Washington Street	Auburn	2743	37	56	No
8 Southwest Retirement Community	5 Washington Street	Auburn	2743	44	66	No
9 Lakeside Mobile Home Court	54 Oak Street	Billerica	2743	231	347	No
10 Fitchburg Mobile Home Park	276 Lunenburg Street	Fitchburg	2743	68	102	No
11 Littleton Motor Court	Route 2a	Littleton	2743	101	152	No
12 Circle Drive Trailer Park	89 West Avenue	Ludlow	2743	5	8	No
13 Town Line Estates	685 Broadway	Malden	2743	76	114	No
14 Rays Mobile Home Park	268 Palmer Road	Monson	2743	60	90	No
15 In-Town Mobile Home Park	633 E. Washington Street	North Attleborough	2743	36	54	No
16 Leisure Woods Estates, Inc.	519 East River Street	Orange	2743	147	221	No
17 Skyline Trailer Park	10 Southbridge Rd. (Rte 20)	Oxford	2743	9	14	No
18 Live Oaks	Union Street	Rockland	2743	20	30	No
19 Boulder Mobile Home Park	1591 Broadway	Saugus	2743	9	14	No
20 Prime-Lo Development, Inc.	51 Park Avenue	West Springfield	2743	20	30	No
21 End of the Lane, Inc.	1 Rose Lane	Worcester	2743	5	8	No
22 Marry's Mobile Home Park, Inc.	557 Southwest Cutoff	Worcester	2743	36	54	No
23 Southwest Manufactured Housing Community	559 Southwest Cutoff	Worcester	2743	20	30	No
24						
25						
26						
					Total: 1,761	

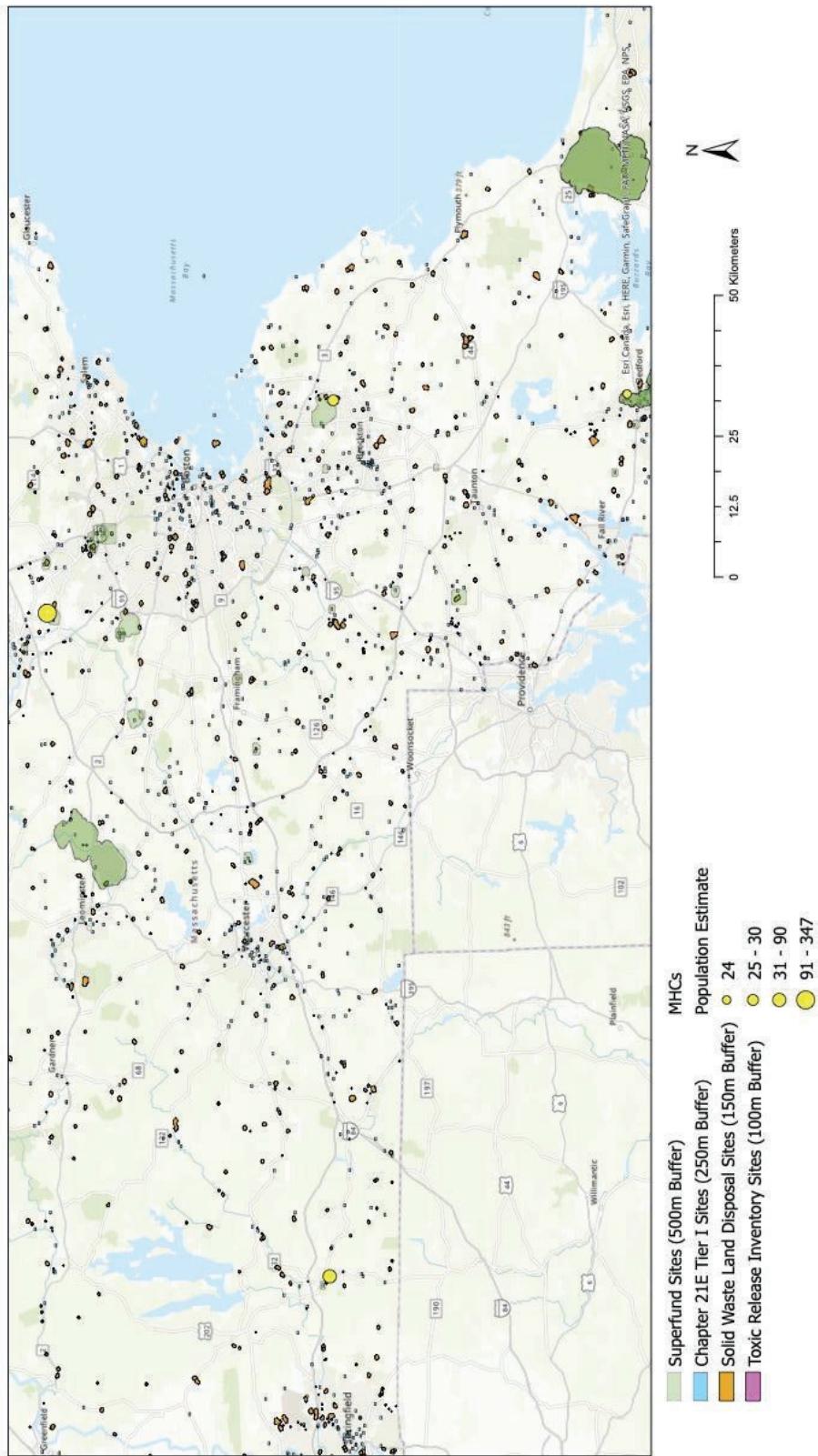
→ Include Superfund Sites = 4
MHCS

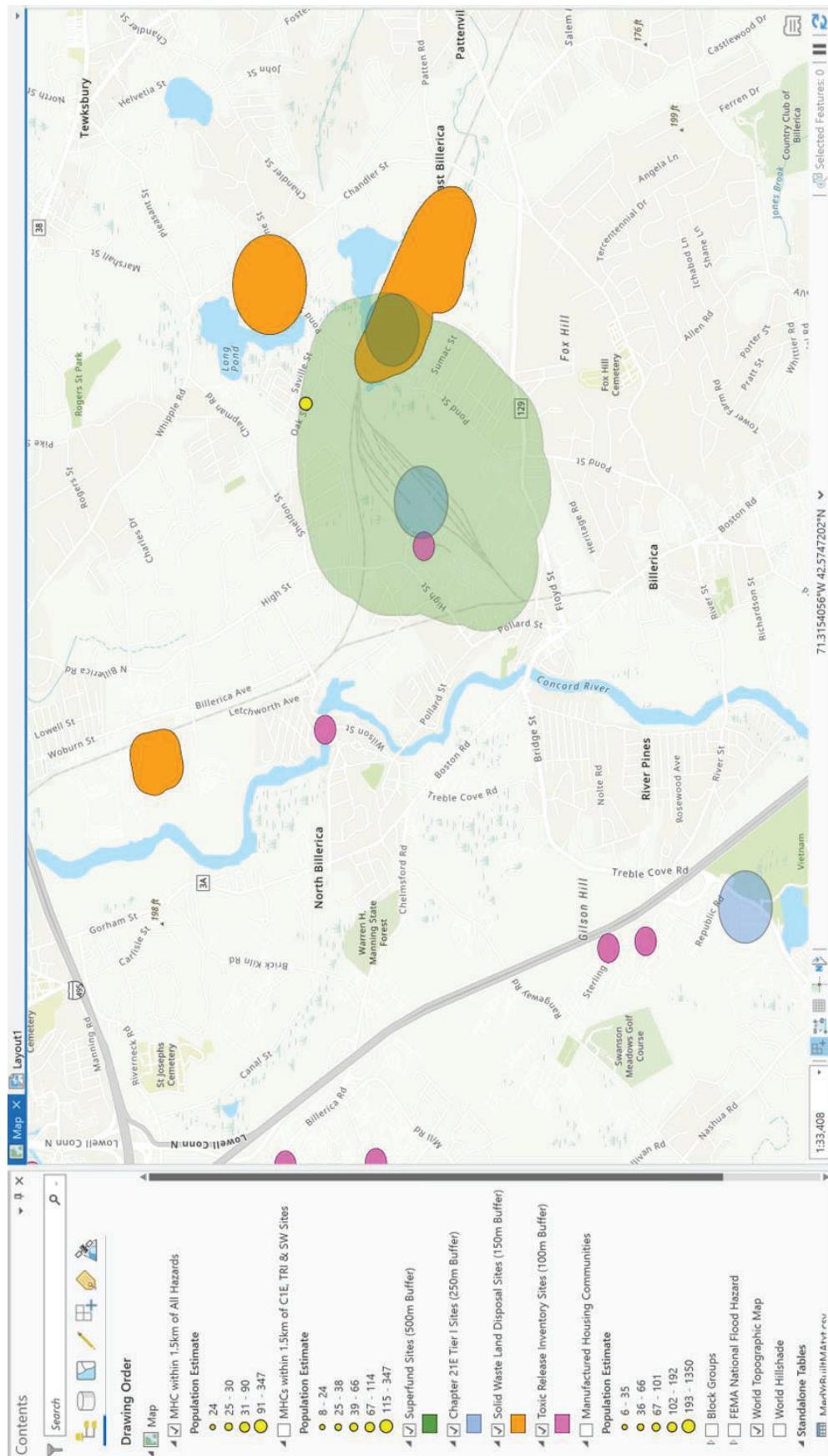
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3 Rays Mobile Home Park	268 Palmer Road	Monson	2743	60	90	No
4 Live Oaks	Union Street	Rockland	2743	20	30	No
5						
6						
7					Total: 491	

Manufactured Housing Communities (MHCs) in Massachusetts Within 1.5km of a Chapter 21E Site, Solid Waste Land Disposal Site & Toxic Release Inventory Site



Manufactured Housing Communities (MHCs) in Massachusetts Within 1.5km of All Four Ecological Hazard Types





Limitations

- MHC list from 2008
- Block group demographic data used as proxy because we do not have demographic data for MHCs themselves
 - Other data we wanted to use but were unable to: disability status, vehicle/transportation access, land use (industrial zoning)
 - Not a holistic analysis of environmental hazards
- Did not combine flood risk and ecological hazard analyses

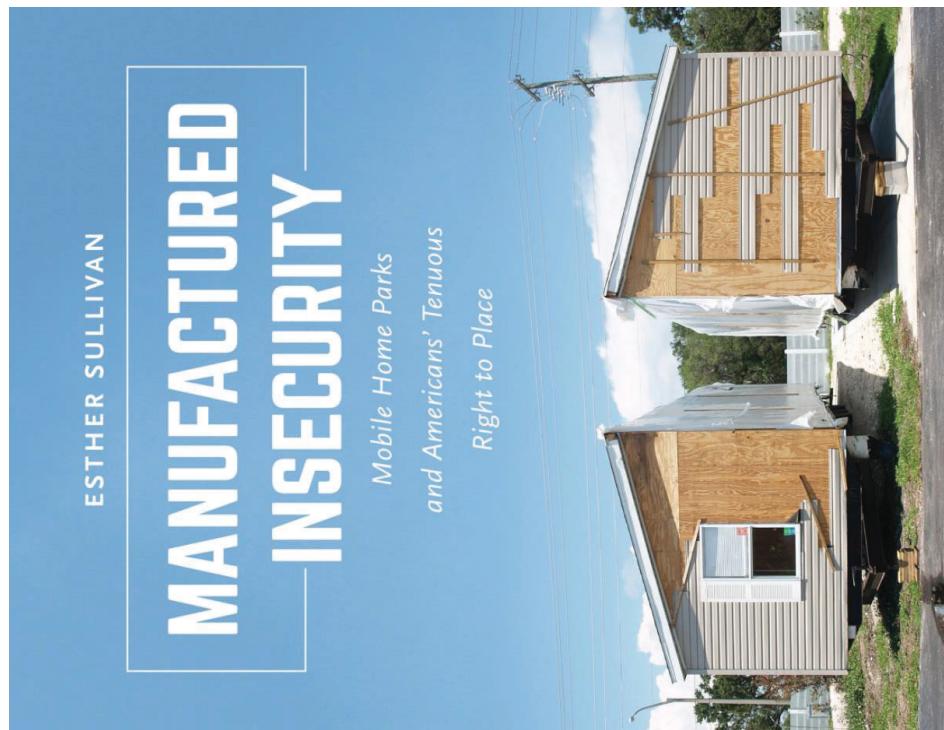
Main Findings

Flooding

- We found **29 MHCS** are located in 1% annual flood zones, in block groups with median age of home built prior to 1976, and in BG with >14% of households with people aged 65 and over.
- These residents may especially vulnerable to flooding due to accumulative risk from geography, demographics, and age of home.

Ecological Hazards

- We found **23 MHCS** in proximity to a 21E, Toxic Release Inventory and Solid Waste Disposal site, and **4 MHCS** in proximity a 21E, TRI, SW and Superfund site.
- Accumulation of exposure to these vulnerable populations may justify greater attention and investment in mitigation or remediation efforts



Thank you!

Any questions or comments?