



April 12, 2022

The Honorable Raymond A. Hull  
Chair, House Municipal Government and Housing  
Rhode Island State House  
Providence, RI 02903

**RE: In support of H7948**

Dear Chairman Hull and members of the Committee,

On behalf of the Housing Network of Rhode Island, our member agencies, and the low income Rhode Islanders we seek to serve, I write in support to **H7948**, legislation that seeks to allow the counting mobile homes under certain circumstances as well as lays out a weighted formula for how the State counts deed restricted units.

The Housing Network of Rhode Island is the State's membership association of 17 nonprofit community development agencies across Rhode Island. Our members have created more than 15,000 affordable homes and is responsible for nearly 70% of the production and preservation of affordable homes made possible by funding from the 2006, 2012, and 2016 affordable housing bonds. Our members are leaders within the communities they serve and have contributed to economic development, revitalization efforts, and the creation of healthy and vibrant neighborhoods in cities and towns throughout Rhode Island. We are committed to serving low-income Rhode Islanders, who are vital contributors to our economy and have the right to safe, healthy, and affordable places to live. HNRI also serves as the backbone organization for Homes RI, a collective impact effort focused on increasing the supply of safe, healthy, and affordable homes across Rhode Island.

I have had the opportunity to elevate some points of clarification and well as suggested technical corrections with the bill sponsors and wanted to share them with the Committee below.

- a) Mobile homes are currently eligible to be counted as low- and moderate-income units when they meet the three eligibility requirements to do so: 1) are provided some form of subsidy to aid in their development, 2) are occupied by a qualified low- or moderate-income household, and 3) are secured by a long-term deed restriction to ensure future affordability.
- b) The reference should be just to mobile homes and exclude manufactured homes in the new sections that begin on line 21 of page 2. Manufactured homes have come to mean different things in the sector and no longer singularly refers to mobile home units. Manufactured homes typically refer to where the housing unit is built such as in a factory or warehouse setting, and not so much a style of the home.

- c) Section iv beginning on line 29 of page 2 could be refined further to make clearer that mobile home units would count as 0.5 units each under the provision of H7948, and that there would be distinction between the counting of the mobile home units under this

bill and those that would otherwise qualify under the existing mechanisms and qualifiers I identified under bullet (a).

- d) The bill could be streamlined significantly if the metric for counting other mobile homes was refined to only include units that are in resident owned mobile home parks and dispense with the income certification and 10-year deed restriction. If income certification were to remain a requirement, that task should be completed by an approved Monitoring Agent who serves in a neutral role to the transition, not the benefiting municipality.
- e) Under section 45-53-3.1, the reference should be to the deed restriction of the unit, not to the income of the household served by that unit. At creation, the unit had a designated AMI target that is codified within the deed restriction. The income of households served by that unit differs widely based on the circumstances of that specific household and it would be exceedingly challenging to count units at that micro level.
- f) Under section 45-53-3.1, upon further consideration we would suggest a slight consolidation of the weighting as follows:

Up to and including 30% AMI = 2  
Above 30% and up to and including 60% AMI = 1.5  
Above 60% and up to and including 80% AMI = 1.0  
Above 80% and up to and including 100% AMI = 0.75  
Above 100% and up to and including 120% AMI = 0.5

- g) We would suggest that the weighting only be applied in a prospective manner, to new units produced after the passage of the bill. Applying this formula retroactively is potentially administratively challenging and not fair and equitable to municipalities who developed units under the prior counting mechanism.

We will continue to work with the bill sponsors to refine and strengthen the language of **H7948** via a Sub-A introduction. Thank you for the opportunity to share my expertise on this topic with this Committee and for your consideration of our suggestions. I am available to answer any questions you might have and can be reached at 401-721-5680 ext. 38 or [mlodge@housingnetworkri.org](mailto:mlodge@housingnetworkri.org).

Respectfully submitted,



Melina Lodge, MCP  
Executive Director