



NATIONAL LOW INCOME HOUSING COALITION

July 23, 2019

The Honorable Pete Gaynor
Acting Administrator
Federal Emergency Management Agency
500 C Street SW
Washington, DC 20472

To Administrator Gaynor,

On behalf of the Disaster Housing Recovery Coalition (DHRC), I am writing to express significant concerns about FEMA's failure to address the disaster housing recovery needs of low-income mobile home residents. Despite the clear need after recent major disasters, mobile home residents have faced significant barriers to FEMA assistance, largely due to unworkable agency policies. Without the assistance they need to get back on their feet, many residents of mobile home parks have had no choice but to live in uninhabitable conditions, sleep in tents or cars, double or triple up with other low-income families, or pay more than half of their income on rent, putting them at increased risk of evictions and homelessness. I urge you to immediately reform FEMA policies to address the unique challenges faced by mobile home residents and to ensure that they are not effectively barred from receiving FEMA assistance.

The DHRC is led by the National Low Income Housing Coalition and includes over 800 national, state, and local organizations, including many organizations working directly with disaster-impacted communities and with first-hand experience recovering after disasters. We work to ensure that federal disaster recovery efforts reach all impacted households, including those with the lowest incomes who are often the hardest-hit by disasters and have the fewest resources to recover afterwards.

Mobile homes and other manufactured homes, especially in mobile home parks, are a key source of affordable housing, particularly in rural America, and these homes are often at a higher risk of damage or destruction during disasters. Nine out of the 10 states with the most manufactured housing were hit by disasters in 2017 or 2018. Mobile homes represent almost [one-third](#) of the homes destroyed by the Camp Fire and nearly [45 percent](#) of the homes destroyed by Hurricane Michael. Southeast Texas had [308](#) mobile home parks suffering flooding damage during Hurricane Harvey. FEMA policies, however, often exclude these survivors from receiving the assistance they need to fully recover.

FEMA consistently requires disaster survivors to provide title documentation in order to prove eligibility for the agency's Individual Assistance (IA) program and other recovery aid. Residents of manufactured housing, however, frequently do not have access to proper or updated title documentation for their home; tracking former owners can be challenging, manufacturers often fail to provide title when the home is delivered, mobile home parks that control title documents frequently fail to keep records updated, and residents often are victims of fraud and rent-to-own schemes related to title and registration and do not have proper documentation. California alone has almost [160,000](#) mobile home owners who lack proper title.

There are other circumstances where FEMA has created alternative documentation for homeowners without title, but unlike those survivors, FEMA has failed to do so for mobile homeowners. FEMA should immediately adopt an alternative document process that can be used by all disaster survivors, including

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mobile home residents, which should be made available in all disaster recovery activities and in various languages on FEMA's website, at Disaster Recovery Centers, to state and local offices of emergency services and on social media.

FEMA policies also fail to recognize that mobile homeowners often do not own the land on which their home is sited and, therefore, do not have a say in whether to rebuild. This leaves them vulnerable to having their aid denied by FEMA aid programs that do not take these unique challenges into account. DHRC partners have been working with residents of Journeys End mobile home park in Santa Rosa California, which was severely damaged by the 2017 Tubbs Fire. There, 44 of 150 homes were not destroyed as were many others, but the fire destroyed the park's power, water and utility infrastructure. The park owners decided not to rebuild, and these 44 families faced additional challenges to receiving assistance to help cover the cost of new housing in the area or to relocate their mobile home to a new park. California inspectors, seeking to help homeowners, declared the mobile home park uninhabitable due to the lack of utility service, but FEMA refused to assist the families because, in the agency's view, their pending homelessness was caused by state action, not a wildfire. This was a cynical result for residents and could not have been farther from the truth. FEMA must move quickly to ensure that none of the mobile home residents in Journeys End or other mobile home parks damaged or destroyed by recent disasters face homelessness and denial of assistance for artificial reasons.

FEMA policies must ensure that the lowest-income survivors, including mobile home residents, have access to the assistance to which they are entitled. The most vulnerable and very poorest disaster survivors otherwise will continue to be put at higher risk of eviction and homelessness.

Sincerely,

A handwritten signature in cursive script that reads "Diane Yentel".

Diane Yentel
President and CEO
National Low Income Housing Coalition