



**Testimony of the Manufactured Housing Association of Maine (MHAM)**

**Neither For Nor Against**

**LD 364 Resolve, Directing the Maine Office of Community Affairs to Submit Legislation and Take Other Actions To Effectuate the Transition of Responsibility for Regulating Manufactured Housing Communities and the Construction and Installation of Manufactured Homes from the Manufactured Housing Board to the Maine Office of Community Affairs**

Senator Curry, Representative Gere, and Honorable Members of the Committee:

My name is Julie Ann Smith, and I serve as Executive Director of the Manufactured Housing Association of Maine (MHAM). I am here today testifying Neither For Nor Against LD 364.

MHAM represents manufacturers, retailers, installers, community owners, and other professionals who provide safe, high-quality, and affordable manufactured housing across Maine. Manufactured housing remains one of the most significant sources of unsubsidized affordable homeownership in our state.

We appreciate the Legislature's continued focus on increasing housing supply and ensuring effective oversight of manufactured housing communities and the construction and installation of manufactured homes. However, the proposed transition of regulatory authority from the Manufactured Housing Board to the Maine Office of Community Affairs raises important structural and governance considerations that merit careful review.

Since 1978, the Manufactured Housing Board has provided oversight through a Governor-appointed board comprised of individuals with direct technical expertise in manufacturing, installation, inspection, and community operations. The Board oversees licensing, inspections, enforcement, and rulemaking — all informed by practical, real-world experience in a highly technical field.

LD 364 would shift those responsibilities to department staff overseen by a Director appointed by the Governor, but not subject to legislative confirmation. This represents a significant structural change in the regulation of manufactured housing.

Our concern is not about modernization or administrative efficiency. Rather, it is about replacing a durable, industry-informed, publicly appointed board structure with consolidated authority within a single department, without legislative confirmation embedded in the oversight framework.

Public policy structures should be durable, transparent, and designed to function effectively regardless of who holds office. A confirmed board provides continuity across administrations, shared accountability, and subject-matter expertise that strengthens regulatory outcomes.

For comparison, when the Division of Building Codes and Standards was transferred to MOCA, the Technical Building Codes and Standards Board was retained to preserve technical oversight. Manufactured housing regulation is similarly technical, involving HUD compliance, federal preemption, installation standards, soil and anchoring requirements, and inspection protocols. We respectfully suggest that comparable consideration be given here.

The Resolve also directs MOCA to “balance and protect” the rights of owners and residents and to increase housing supply. While those are laudable goals, the language is broad and undefined. Without clear guardrails, future proposals could unintentionally create regulatory uncertainty that discourages investment in manufactured housing communities — the very communities that provide some of Maine’s most affordable unsubsidized housing.

Investment certainty is essential if we want to expand supply.

As this process moves forward, we respectfully request that any implementing legislation:

- Preserve an industry-informed oversight board structure;
- Maintain legislative confirmation within the oversight framework;
- Clearly define the scope of any proposed changes affecting owner and resident rights;
- Ensure meaningful stakeholder consultation is embedded in the legislative process;
- Include MHAM as a listed stakeholder; and
- Include current inspectors as listed stakeholders to preserve institutional knowledge.

Manufactured housing plays a critical role in Maine's housing ecosystem. Any restructuring should strengthen accountability, preserve technical expertise, and promote production — without creating unintended consequences that could slow investment or reduce supply.

MHAM stands ready to work collaboratively with MOCA and this Committee to ensure a fair, functional, and forward-looking regulatory framework. Given the scope and structural implications of this proposal, it may be prudent to consider whether waiting until the next legislative session would allow for more thorough stakeholder engagement before eliminating the Manufactured Housing Board and transferring its functions.

Thank you for the opportunity to testify. I would be happy to answer any questions.