

MOBILE MANUFACTURED HOME ADVISORY COUNCIL

MINUTES

MARCH 10, 2020

The Mobile Manufactured Home Advisory Council convened on Tuesday, March 10, 2020 at 10:06 AM at 450 Columbus Boulevard, Hartford, CT, 06103 in the North Tower, Plaza Level, Hearing Room J

Members Present:	Bennett Pudlin	Attorney at Law, Acting Chairperson
	Mark Berkowitz	Mobile Home Park Owner
	Myriam Clarkson	Mobile Manufactured Home Industry Representative
	Al Hricz	Senior Citizen (by telephone)
	Jennifer Ponte	Department of Housing
	Colette Slover	CT. Housing Finance Authority Representative (by telephone)
	Marcia L. Stemm	Mobile Home Park Owner

Members Absent:	Joseph B. Castonguay	CT Real Estate Commission Member
	Leonard Campbell	Town Planner
	Dave Delohery	Mobile Home Park Tenant or Representative of Such Tenant
	Arthur Mazeau	Mobile Home Park Tenant or Representative of Such Tenant

Member Vacancies:	Banking Industry Representative
	Mobile Home Park Tenant or Representative of Such Tenant
	Mobile Home Park Owner

DCP Council Staff:	Robert M Kuzmich, R.A.	License & Applications Specialist
	Paulette Annon,	Staff Attorney
	Pamela Brown,	Director, Investigations Division

Others Present:	Mark Asnes, CMHA
	Nancy Palmisano, Connecticut Manufactured Housing Association
	Raphael Podolsky, Connecticut Legal Services (by telephone)

Note: The administrative functions of the Boards, Commissions and Councils are carried out by the Department of Consumer Protection, Occupational and Professional Licensing Division, Richard M. Hurlburt, Director. For more information, refer to DCP Agency website: www.ct.gov/dcp

Division E-Mail: dcp.occupationalprofessional@ct.gov

MINUTES OF PREVIOUS MEETING:

1. Review of the December 4, 2019 Mobile Manufactured Home Advisory Council meeting draft minutes. The Council voted, unanimously, to approve the minutes as written. (Stemm/Clarkson)

COMMENTS OR CONCERNS OF ANY PERSON PRESENT TODAY:

There were no comments or concerns discussed.

REPORT FROM SUB-COMMITTEES:

LEGISLATIVE COMMITTEE:

1. Update and continued discussion regarding revision to DCP enforcement powers and related proposed statutory changes
2. Continued discussion regarding revisions to Disclosure Statement

Mr. Pudlin noted that there has been no pressure from the Department on this matter and that he and Mr. Podolsky made revisions to this document previously. He noted differences in the past with Attorneys at the Capitol and the Department about whether the disclosure statement had to be in the regulation or not. The decision was made in the Department's favor and the document is now a stand-alone document. The Council now has the opportunity to make revisions as they wish. It was decided that Mr. Pudlin and Ms. Clarkson will work together on making further revisions. This matter will be brought back on the agenda for the Council's next regular meeting.

FINANCE COMMITTEE:

1. Discussion of meeting with CHFA about financing of homes and parks.

Mr. Pudlin advised the Council that the scheduled meeting with CHFA for March 2020 had been canceled due to Council Member conflicts and CHFA internal matters that needed to be addressed. He offered the Council two alternative dates: April 17, 2020 at 11:00 AM or April 21, 2020 at 2:00 PM. Mr. Pudlin will get word out to the missing members in a week and decide on a date based on their availability.

EDUCATION COMMITTEE:

No new discussion took place on this topic.

OLD BUSINESS:

1. Status of Country Mobile Estates and Oakridge Gardens Mobile Home Park complaints pending with DCP Legal Division and status of licenses.

Ms. Annon addressed the Council concerning Country Mobile Estates. She stated that there is a receiver in place and noted the specifics of the stipulated agreement reached by the Department and the receiver. She stated that the progress on actions of the agreement is moving quickly. Mr. Pudlin noted for the record that this matter concerns receivership action brought by the bank.

Ms. Annon also addressed the Council concerning Oakridge Gardens Mobile Home Park. She noted the Park failed its inspection and noted the specifics of the same. The Department attorney handling the complaint will be bringing the owner in for a compliance meeting sometime in April 2020.

2. DCP proposed legislation affecting mobile homes.

Ms. Annon noted that the Department submitted Senate Bill 125 modifying the language of the Section 34 concerning renewals. The language now states that the Mobile Home Park's license renewal will be subject to the compliance of the Park's inspection requirements performed in the prior year. The Council further deliberated other proposed legislation discussed in the past concerning license renewals.

Ms. Brown further clarified the park inspection process as it relates to their renewal. Mr. Pudlin noted that he finds the proposed language problematic and ambiguous and urged the Department to take a second look at it. However, the existing language gives the Department the authority to hold a license based upon not conforming to the inspection requirements. The new language changes the inspection period making reference to the Park's inspection done the previous year. The Council discussed examples of the application of the language relative to existing parks. Mr. Pudlin asked that the Department declare what their intent is with the proposed language. He also asked that Council Members bring to the Department specific examples that illustrate whether the language is carrying out the intention of the Department.

NEW BUSINESS:

1. Proposal for a committee of the Council to review problematic leases.

No discussion took place on this topic.

2. Ms. Annon noted to the Council that there is a Mobile Home Park closing of which the Department was notified. The location of the Park was thought to be in Orange, Connecticut but was not confirmed at this meeting. Mr. Podlosky asked if the Department has notified that the remaining Park tenants were made aware of their rights. Ms. Annon noted that the Department's investigator was in touch with the Park Owner. The Investigator informed the

owner of the resident's rights. Further, Ms. Annon further communicated with the owner by e-mail informing him of resident rights as well as other matters. She noted the owner was not happy. Mr. Pudlin noted that Tenant Rights are published on the Department's website.

3. Ms. Annon noted several Mobile Home matters in her queue to be addressed but nothing unusual or that needs Council involvement at this point.

CORRESPONDENCE:

None.

DCP COMPLAINT AND INSPECTION REPORTS:

1. Discussion with Pamela Brown on inspections, complaints, and licensing.

Ms. Brown gave the Council a hard copy of the complaint report she just received. She reviewed the report's format and answered Council Member questions about the complaints, in general. She defined specific terms on the report in response to a question from Mr. Pudlin and other Council Members. Mr. Pudlin suggested that this report be sent electronically to him in the future, ahead of the meeting dates, so he can circulate it with other Council Members for their review and present all comments at the next meeting. He asked that the reports contain all expanded categories as discussed at today's meeting. Ms. Brown agreed and will do so. She also further discussed complaint details in general with Mr. Pudlin.

Ms. Brown noted the Department is in the process of migrating to a new mobile hand-held inspection application. The application is not yet linked to the Department's database but will be in the future. She also discussed the Department's recent inspection activities in recognition of their reduced staff.

Mr. Pudlin asked Ms. Brown a question regarding whether the Department has made any progress in the process of identifying parks that theoretically went out of business but in fact were still there. She noted that she will check with the Licensing Division. Mr. Pudlin noted some information that he and Ms. Palmisano had obtained from their previous work in this area and shared some suggestions to Ms. Brown on how to possibly address this matter in the future.

Mr. Pudlin thanked Ms. Brown for diligence and expressed the Council's appreciation for her efforts.

2. Review of current complaint report including open, closed, and dismissed cases.

Discussion on this matter is included above under Line Item #1.

3. Review of current inspection report and inspection schedule.

Discussion on this matter is included above under Line Item #1.

COMMENTS OR CONCERNS OF ANY PERSON PRESENT TODAY:

There were no comments or concerns discussed.

There being no further business, the meeting adjourned at 11:35 AM.

Respectfully Submitted,

Robert M. Kuzmich, R.A.
License and Applications Specialist

2020 MEETING SCHEDULE:

- June 17
- September 16
- December 16

All meetings will take place at 450 Columbus Boulevard, Hartford, CT at 10:00 AM unless otherwise note.