



8 February 2023

Chair Dexter, Vice-Chair Gamba, Vice-Chair Helfrich and Members of the Committee,

On behalf of the Mid-Willamette Valley Community Action Agency, I write with concern on House Bill 2634, which would apply the provisions of residential landlord-tenant law to recreational vehicle parks. Most concerning, it expands the vacation occupancy exemption from landlord-tenant law to space occupancy within RV parks of 90 days or less, and shortens the timelines for eviction to an unreasonable and unnecessary two weeks. My name is Jimmy Jones and I am the Executive Director of MWVCAA, where we serve low-income residents of Marion, Polk and 11 other counties across Oregon. Annually we provide more than \$70 million in services and direct client assistance for housing, homelessness, energy and weatherization, and early learning programs to more than 55,000 Oregonians in poverty. I also sit on the Housing Committee of the Governor's Racial Justice Council, and the House Bill 2100 Task Force on Homelessness and Racial Disparities.

House Bill 2634 in specific:

- **Creates** a definition in **90.100** of a “Recreational Vehicle Park” which is linked to **197.492** (specifically that it is not a picnic area and not an Mobile Home Park, but a place where two or more recreational vehicles are located within 500 feet of one another on a lot, tract or parcel of land under common ownership and having as its primary purpose: (A) The renting of space and related facilities for a charge or fee; or (B) The provision of space for free in connection with securing the patronage of a person).
- **Expands** the vacation occupancy exemption to include RV park rentals of less than 90 days, if the RV has to move from the park at the end of the 90 days before coming back.
- **Allows** termination of an RV tenancy that is not a vacation occupancy (that is, if it is in the park for longer than 90 continuous days) **without cause** upon 14 days' notice. This provision would reduce the current notice period from 30 days (for residencies less than a year) or 60 days (for residencies greater than one year).
- **Amends** the abandoned vehicle statute to say that a landlord can sell or destroy an abandoned RV in the park if it is worth less than \$4,000.

This is simply bad public policy, designed to regulate a few outlier behaviors that can be solved through other means. There is a large and growing population of low-income and impoverished Oregonians living in RV's. Those numbers have swelled in recent years because of the Labor Day Fires of 2020, and the growing affordability and homeless crisis across Oregon. For the poorest residents living in RV's, a park is the only real safety they have, and the only place they can be free of the constant harassment that often follows from vehicle squatting in public places.

In some of the most impoverished parks, people live in RV's that are no longer mobile, some of which are simply rotting into the ground. I have visited folks inside these RV's, seen people raise their families in decaying units with no water or sewer, with ceilings that cannot hold out the rain in the winter, and insulation falling on them as they sleep at night. For many, these RV's are their absolute last option before they enter street homelessness. Often they have no resources to make the repairs

needed to make the RV's mobile. When they can afford the repair costs, it can take several months to save the money and repair the RV. If House Bill 2634 is enacted in its current form, it will only serve to drive more mobile (and some barely mobile) RV's into residential neighborhoods and lead more Oregonians into street homelessness. Who are these folks in the RV's? They're often retirees, the elderly and the very young, veterans dealing with service-related trauma, grandmothers who can no longer afford the rent after their partner passed away. The \$4,000 value for destruction and sale is equally problematic. It sends the message that people who live in RV's worth \$25,000 have one expectation of property rights, but those who live in homes worth \$2,500 must have another. To those of means we give protection, but to those with little we dispose of their property because it lacks requisite value. Yet inside those homes are the very same things the rest of us would be pained to lose as well: family photos, your grandfather's watch, and everything else they own in the world.

They may not look like much, to many, but to the people who live in these RV's it is their only home. Why should they not have the same protections in that home that every other resident of Oregon enjoys? If enacted as written, House Bill 2634 will sweep up the good with the bad, and some landlords will evict their longer-term low-income tenants to charge higher rates to out-of-state snowbirds here for vacation season. These Oregonians have no other home and most are very poor. RV parks are a prime source of affordable housing in our state, and if we exempt them from landlord-tenant law we are destabilizing a great number of vulnerable people at a time when suffering is already very high, housing costs continue to skyrocket, and the Governor just declared a homeless emergency in Oregon.

There are ways forward to address the costs and trouble of RV park owners with abandoned property and unpaid space rent, without harming the poor.

Respectfully,

A handwritten signature in blue ink, appearing to read "JJ".

Jimmy Jones
Executive Director