

Date: 2/14/2024

To: Sen. Kesha Ram Hinsdale

From: Shaun Gilpin

Subject: Additional Testimony on S.311 DHCD 2-14-24

As an addendum to my brief comments in Committee today, I would like to submit the following for the record. Regarding the proposed Mobile Home Park Infrastructure Needs Assessment referenced in section 48 of the current language in S.311 (and pasted below for your convenience), the Department of Housing and Community Development would respectfully recommend striking this language.

The reality is that a meaningful assessment of the described needs would require engineering review of a large portion of the approximately 248 mobile home parks in the state. As you know, neither the Housing Division, nor the Agency, employ staff with that expertise so a contractor would need to be hired. The proposed appropriation of \$50,000 would be insufficient to cover the cost of an assessment of this scale. Also, a majority of the mobile home parks are in the ownership, and under management, of private individuals, some of whom may opt not to cooperate, further diminishing the comprehensiveness of a resulting report.

Finally, and perhaps most importantly, it is unclear whether additional specificity on a known issue will alter our strategy for addressing this need. We already know that there is significant deferred maintenance within many of Vermont's mobile home communities. The Department of Environmental Conservation is currently operating the high-in-demand Healthy Homes Initiative to address these needs. The program can cover the costs of both the specific engineering work to inform a project as well as provide grants to assist with the cost of infrastructure improvements. This has proven to be a successful vehicle to address the known issue – further supporting this work is pivotal.

In summary, the Department feels that additional study of the specific infrastructure needs in mobile home communities is unnecessary and public dollars would be better spent on the established program to address the need.

Thank you for the request to provide our perspective and I would be more than happy to join the Committee at a future time to discuss any other sections of this important bill.

Sincerely,
Shaun

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Sec. 48. MOBILE HOME PARK INFRASTRUCTURE NEEDS ASSESSMENT

(a) On or before January 15, 2025, the Department of Housing and Community Development shall submit a report to the Senate Committee on Economic Development, Housing, and General Affairs on the near- and long-term infrastructure needs of each mobile home park in the State. The report shall recommend plans to address those needs.

(b) The sum of \$50,000.00 is appropriated from the General Fund to the Department of Housing and Community Development for the purpose of subsection (a) of this section.