



Report of the Governor's Committee
on Manufactured Housing

Norman Williams, Jr., and
Robert A. Metz, Co-Chairmen

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REPORT OF THE GOVERNOR'S COMMITTEE ON MANUFACTURED HOUSING

In appointing this Committee in August 1969, Governor Davis requested it to consider all aspects of mobile home development in the State and to recommend a proposed State policy on the location of both mobile home parks and individual mobile homes, in the context of current developments affecting mass-produced housing - and to draft legislation where necessary to carry through the Committee's recommendations. The Committee has met five times during the fall, and this report marks the completion of the current stage of its deliberations.

The Dilemma

In approaching these problems, the Committee has been confronted with a major dilemma. Mobile homes have been providing safe, sanitary, and convenient housing for a substantial number of Vermonters; in fact, such homes have been the largest single source of adequate new housing for the lower and lower-middle income groups, where good housing is most needed.¹ Yet much current mobile home development creates other problems, and serious ones. First, protection of the scenic environment in Vermont is one of the most important problems confronting the State during the coming decade; and in recent years the rapid spread of mobile homes all over the State² has been one of the major factors adversely affecting that environment - because most mobile homes currently available are so unattractive, and because they have been so badly sited on the land.

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For this reason, at the initial meeting Governor Davis urged the Committee strongly that, while adequate protection should be provided for Vermont's scenic environment, under no conditions should mobile homes be excluded from large areas of the State.

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Shipments of mobile home units to dealers in Vermont have almost quadrupled between 1960 and 1968, and now run about 1,500 per year.

Moreover, some mobile home parks are much more harmful to their own residents than to their neighbors; for in such parks people are living with inadequate health and sanitary facilities, with inadequate open space (or none) for outdoor recreation and children's play, and often in locations which are inappropriate or inconvenient.

The dilemma is compounded by current technological trends. Public regulation of a particular type of housing is invidious at best, especially when directed at those housing types serving the lower-income groups; and current progress towards new forms of manufactured housing may result in many different types of such housing, so that such regulation is likely to be ineffective as well.

Summary of Recommendations

After long discussion of the above problems, the Committee is ready to recommend a proposed solution. In brief summary, because the mobile homes currently available so often provide unsatisfactory living conditions, and because they present a threat to Vermont's scenic environment, public regulation is needed at once. On the other hand, because mobile homes play so important a role in providing low- and moderate-cost housing, any legal restrictions excluding mobile homes from large areas of the State would be most undesirable. Accordingly, the layout and density of mobile home parks should be regulated and considerable open space required, with substantial screening around the perimeter. Moreover, the location and the actual site plan of such parks should be subject to public review. The Committee is convinced that, with proper site planning, mobile homes can provide an attractive living environment, and further that there is no inherent reason why such homes need be ugly; and the present period of rapid change in the technology of mass-

produced housing appears to provide opportunities for real improvement. Accordingly, the proposed restrictions should be regarded as purely temporary, pending intensive efforts to encourage better site planning and to bring pressure on the mobile home manufacturers to improve design. In order to be effective, any such efforts will have to be on an inter-state basis.

Policy Background

The main policy problems need to be spelled out in more detail. The critical importance of protecting the Vermont landscape is now widely recognized, and the problem of regulating mobile homes is of special significance here. Vermont has some spectacular views, and many more areas of special historical and ecological significance; but the special feature of the Vermont landscape is the "typical Vermont scene," so often illustrated in Vermont Life and elsewhere. When analyzed closely, this typical scene is a really remarkable thing - a valley scene from ridgetop to ridgetop, with the open fields usually extending from the valley bottom part-way up the hillsides, and with marvelous and infinitely varying patterns of woods, fields, and stone walls, of streams, and of buildings, together with great variation of sunlight and shadow and sky, of color and texture. It is precisely in this type of area that both mobile homes and mobile home parks have been locating, with results that are often devastating. Several fine scenes are spoiled every year by such developments.

The factors responsible for Vermont's critical housing needs are almost equally familiar. The State's population has been stable right through the 20th century, up to 1960; but in recent years Vermont has begun to grow rapidly, along with the rest of the nation. Chittenden County is now developing

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Shipments of mobile homes units in 1968 to dealers in Vermont amounted to about 1,500, or 1/2% of the national total. In 1968, for New England as a whole, the figures were about 9,000 and 3% - and, if New York and Pennsylvania are added, 35,000 and 11%.

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much like any small metropolitan area in the rest of the country, and so are some other areas of the state, particularly in the south. In part this growth is due to the huge expansion of the metropolitan areas to the north and south of Vermont, together with the rapid advance of the Interstate Highway system, which is bringing most of Vermont within three to five hours of the Boston and Montreal metropolitan areas, and within six hours of the New York area. In part it is also due to national demographic trends, also apparent in Vermont. The much larger number of children born each year after the Second World War have now begun to reach marriageable age, and so family-formation is certain to rise in the coming years. Finally, in part it is due to the demands generated by needed industrial expansion. As a result, the population of Vermont is now expected to increase from 439,500 to 511,000 in the next ten years. As a result, the State will have a very large need for new housing units, particularly at the middle- and lower-income levels.

The quality of new housing is as important as its quantity; and the protection of the health and safety of the residents of mobile homes, particularly in mobile home parks, presents equally serious problems. Such developments obviously present special problems of water supply and sewage disposal, and these are now being taken care of by the State Health Department's new regulations. Yet basic questions remain on the location and layout of such parks. In Vermont, people rightly expect that a residential area should be not only safe but pleasant, a place for relaxation, for good living, and for the human spirit to develop; and both adults and children should have some open space for play and recreation, right next to home. All through our history, most Vermonters have been able to enjoy this; most of us grew up in pleasant, well-planned towns, with a central green and with community facilities conveniently grouped nearby, and yet with open country only a five minute's walk away.

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After 1946 and until 1963, the number of births each year was over 140% of the 1935-1939 average.

One look at many mobile home parks in the State is sufficient to point up the painful contrast. In Vermont, of all places, it is inexcusable that many future citizens are growing up in overcrowded developments, often lost right in the midst of open country. Moreover, in other instances such citizens are relegated to areas unsuitable for living - crowded amid strip-commercial development next to busy highways with their noise and fumes and danger to children, near industrial nuisances, or next to a dump or some other dismal bit of run-down countryside. If our most needy citizens are to be forced into such an environment as this, we had better stop talking about respect for human dignity.

The Proposed Law

The Committee recommends a new law to regulate new mobile home parks and individual mobile homes on a state-wide basis; a draft of such a law is submitted along with this report. For mobile home parks, this law provides that such parks should be densely screened from all adjacent public highways, and from all other adjacent land.⁵ In addition, the density of development within such parks is regulated by reasonable standards, so that such parks will conform to the best examples we now have and will be an attractive and livable addition to a town's residential environment.⁶ Moreover, the site plans for such mobile home parks will be subject to a detailed review by a State agency, presumably the Planning and Community Services Agency.

⁵ These requirements will have an additional advantage of discouraging such development on the best open valley-bottom land and encouraging the use of areas already wooded.

⁶ 52% of occupied mobile homes are in parks with a density of less than 4 mobile homes per acre. Under the proposed regulations density will vary according to size.

In order to carry out this job effectively, a small expert staff will be needed, and this can only be done economically on a state-wide basis.

The cost of such a staff will be moderate. The Committee wishes to emphasize the point that protection of our precious scenic assets is not necessarily available for free; and a State which is unwilling to spend any money to preserve such assets hardly deserves to have them.

Obviously any requirement for additional land for mobile home parks may involve some increase in the cost of housing in such parks, at least as compared with the worst examples in current development; and the same is true as to screening. At the Committee's request, the Planning and Community Services Agency has prepared an analysis of the economic implications of the proposed land requirements; and it appears that these regulations will involve an estimated development cost over and above expenses customarily made on mobile home park developments in Vermont, of from about \$500 to \$1,200 per mobile home unit in such parks, depending on size and specifications. The Committee believes that such additional cost is entirely reasonable. Moreover, while the Committee is strongly in favor of more moderate-cost housing, and recognizes that some subsidies may be needed, it does not believe that it would be wise in effect to subsidize such housing by permitting it to do serious damage to our scenic environment. Almost any other form of subsidy would be better than this.

On individual mobile homes, we recommend that these should be permitted on substantial-size plots, again subject to detailed site plan review by a state agency. A good case can be made for requiring that in the future all mobile homes should be located within mobile home parks, for it is far easier to provide (and also to supervise) good site planning for mobile homes when they are

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See Appendix I.

collected in such parks. Yet, such a policy would infringe a precious and basic freedom, and would necessarily involve real economic discrimination against the poor as well; and we believe that it should be rejected. A Vermonter should not be so drastically restricted in his choice of a home site, merely because he cannot afford a more expensive house. One special problem is particularly important here: a mobile home, placed next to an existing house, may often make possible reasonable living arrangements for a family and its in-laws. The proposed law therefore makes special provision for this situation.

Under the proposed regulations, both mobile home parks and individual mobile homes can be developed economically in such a way as to provide desirable additions to a town's residential environment, rather than being harmful to that environment; and the proposed requirements have been limited to those which are essential to accomplish that purpose. However, other improvements are possible which would improve the convenience and the livability of mobile home development, as for example, by providing central recreational facilities; and incentives are also provided for those developers of mobile home parks who are willing to provide such facilities, in the form of reductions in the required lot area per mobile home unit.

The question of a town's power to impose additional restrictions on mobile home parks, over and above the proposed state regulations, is a serious one. If a town has the power to provide much more restrictive regulations, or to forbid mobile homes and mobile home parks entirely, and if a large number of towns use such powers, the basic State policy of encouraging such low-cost housing will necessarily be nullified. Accordingly, the proposed law limits a town's power to exclude mobile homes to those situations where a town already has a large number of mobile home units, or where a town has made some different but adequate provision for encouraging needed low-cost housing. On the other hand, a town may,

if it so chooses, require that future mobile homes must be located in a mobile home park.

In order to encourage more well-designed mobile home parks, the proposed law also authorizes towns to acquire land and to resell it for such development, and to provide for tax exemption on the improvements in such parks for a period of years.

Tax Problems

Concern is often expressed for the tax consequences of mobile homes; and so at the Committee's request, the State Tax Department prepared an analysis of such consequences in a group of Vermont towns. Their basic conclusion was reassuring:

"Probably the most significant conclusion to be drawn from this study is that in the five towns surveyed, mobile homes in 1969 were less of a burden on the taxpayers of these towns than were other homes."

Apparently this was true for two reasons. Mobile homes, being small, had far less school-age children than conventional homes, an average of only 0.41 public school pupils per home, while other homes averaged 1.07 children per home. Second, apparently assessors tended to appraise mobile homes at a higher ratio of their fair market value than other homes. Presumably this was because the cost of mobile homes is both standardized and readily available, and so was used, while it is common knowledge that assessors tend to under-assess other homes. According to the best information available, then, mobile homes do not create any special burden, in terms of the burden on public services, and of the assessment per unit of residential floor space. However, since mobile homes are often smaller than conventional homes, a mobile home may pay less total taxes for that reason. There is one school of thought which argues that all homes should so far as possible be made to pay their way, and that a municipality should (or may) prohibit

small homes for this reason. This Committee does not subscribe to that philosophy, for several reasons - partly because in fact almost no residences do pay their way, partly because the poor must live somewhere, but primarily because the economic segregation which would result from exclusion of small homes is alien to our traditions in Vermont, where most towns contain people from a broad range of income groups, who grow up together and get along together.

Other Considerations

The Vermont Society of Architects has taken the lead along with other local AIA Chapters to work with the mobile home manufacturers in improving the design and appearance of mobile homes. A mechanism is provided in the proposed law whereby if major improvements are achieved, specific models may be exempted from the regulation of this act.

Obviously, the level of public taste can only be raised by a broad educational program, and such a program is needed, for in default of this there will be no definitive solution to some of the above problems. However, current problems cannot wait upon such a long-run program, and we recommend immediate action on the proposed legislation.

Appendix I

Incremental Costs to Developers in Meeting Proposed Regulations for Mobile Home Subdivisions

1) Assuming 200 ft. wide perimeter		2) Assuming 100 ft. wide perimeter							
Units	Green Belt Area ¹	Trees in Green Belt	Interior Trees	Trees ²	Land ³	Common Underground Oil or Gas Tank ⁵	Underground Electric and Phone Wires ⁴	Total	Per Unit
25	13.1 acres	5,711	50	\$14,403	\$ 1,310	\$ 3,750	\$10,000	\$29,463	\$ 1,176.50
50	17.0 acres	7,404	100	18,760	1,700	6,250	20,000	46,710	934.20
100	20.0 acres	9,686	200	24,715	2,000	10,000	40,000	76,715	767.15
100	22.6 acres	9,811		25,115	2,300			77,370	773.70

1) Assuming 200 ft. wide perimeter		2) Assuming 100 ft. wide perimeter							
Units	Green Belt Area ¹	Trees in Green Belt	Interior Trees	Trees ²	Land ³	Common Underground Oil or Gas Tank ⁵	Underground Electric and Phone Wires ⁴	Total	Per Unit
25	5 2/3 acres	2,471	50	\$ 6,303	\$ 567	\$ 3,750	\$10,000	\$20,620	\$ 824.80
50	7 2/3 acres	3,324	100	8,560	767	6,250	20,000	35,577	711.54
100	10.2 acres	4,434	200	11,585	1,020	10,000	40,000	62,605	626.05

- 1 Assumes: a) 8,000 sq. ft. per unit for home and common facilities
 b) .600 sq. ft. for parking: 1 1/2 resident's cars and 1/2 visitor's cars per unit @ 10' x 30' per car
 c) 1,720 sq. ft. per unit for streets
 d) "a", "b", and "c" are no more luxurious dimensions than present parks
 e) a square plot of ground, intermediate between circle and rectangle in efficiency of perimeter usage
- 2 \$2.50 per tree
- 3 \$100 per acre (1970 price assuming 50% increase in 1956-1966 annual growth rate of average of land prices on page 37 of Vision and Choice)
- 4 Green Mountain Power Co.
- 5 David Partridge of Wyman's, Inc., Montpelier