

SPATES FAMILY LLC  
MEMPHREMAGOG RENTALS LLC  
DOUGLAS SPATES, MEMBER  
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NEWPORT, VT 05855  
802-673-7593 ©

March 20, 2023

House General & Housing Committee

RE: PLEASE PASS H.184

Dear committee members:

I wish to comment on the initiative imposed by the Health Department requiring fees and specialty contractor insurance for all entities performing RRPM on pre-1978 rental units, including not only contractors but owners of said units who paint and maintain their own units. As an owner, I have already completed all the previously required lead paint instruction and certification as have all of my employees. We have complied with all of the State's previous requirements and feel that this new initiative by the Health Department is detrimental to owners who are already in compliance.

I do not believe that the State can continue to promote affordable housing while at the same time imposing additional fees and demands on landlords without expecting consequences, specifically in the form of rent increases. In my opinion, the previous rules for essential maintenance practices (EMPs) were working. The downfall has been that the Health Department has not ensured that everyone is in compliance. Instead, they have made the rules even tougher on those people already in compliance. Spates Family LLC and Memphremagog Rentals LLC own and manage in excess of 350 units in the Northeast Kingdom. We work hard to maintain our properties and follow the rules. It seems unfair that we should be penalized by these additional rules that have been concocted by the Health Department with no regard for the differentiation between owners and private contractors. The EMP training that has been previously offered and taken by all of our crew should be adequate. If periodic refresher courses are required, that would seem reasonable.

Please place my letter into the House General & Housing Committee's public record for consideration of H.184.

Sincerely,

Douglas B. Spates, member  
Spates Family LLC  
Memphremagog Rentals LLC