

To: Chair, Representative Thomas Stevens; House Committee on General and Housing

From: Christopher Trombly, Vermont State Housing Authority, managing agent for The Housing Foundation Inc.

Date: February 20, 2024

RE: H.556 Conservation and development; mobile home parks; flood risk disclosure

Dear Honorable Chair Stevens,

About HFI

The Housing Foundation, Inc. (HFI) is a Vermont non-profit corporation created in July of 1986 to promote and encourage affordable, quality, low-cost housing for low-income families, the elderly, and persons with disabilities. HFI accomplishes its mission by constructing, purchasing and managing housing; placing emphasis on sound construction, energy efficiency, and resident accessibility in the purchase and development of properties within the constraints of economic realities and making every good faith effort to address the needs of special populations.

HFI is a 501(c)(3) non-profit that takes advantage of opportunities to preserve existing housing stock, develop new properties and improve the quality of Vermont’s existing mobile home parks. The financing packages necessary to carry out these activities are multi-layered and include funds to upgrade sewage systems, water supplies, electrical systems, implement energy efficient measures, and make other improvements. These capital improvements meet environmental regulations and habitability standards. Many resources and partnerships are instrumental and include both federal and state resources and non-profit cooperation.

HFI Mobile Home Communities:

SUMMARY OF MOBILE HOME PARK ANALYSIS											
Last Updated: 4/24/2023											
MHP ID	Name	County	Town	Year Est.	Ownership Type	Total Lots	Infrastructure Summary		Flood Hazard Summary		
							Water System Type	Sewer System Type	Highest Flood Hazard Area of Land in Park	# of Lots in all Flood Hazard Areas	
46	Mountain View Court Mobile Home Park	Bennington	Bennington	1962	Non-profit	20	Consecutive	Municipal	None	0	
138	Fernwood Manor	Chittenden	Bolton	1978	Non-profit	78	Community	Community On-Site	None	0	
144	Windemere Estates	Chittenden	Colchester		Non-profit	83	Consecutive	Municipal	None	0	
139	Mountain View Mobile Home Park	Chittenden	Hinesburg	1968	Non-profit	52	Municipal	Community On-Site	None	0	
83	Birchwood Manor	Chittenden	Milton	1966	Non-profit	172	Consecutive	Municipal	None	0	
111	Roy's Mobile Home Park	Franklin	Swanton	1962	Non-profit	32	Municipal	Municipal	None	0	
136	Cooper's Bay Mobile Home Park	Grand Isle	Grand Isle	1954	Non-profit	24	Municipal	Individual On-Site	None	0	
78	Mobile Acres Mobile Home Park	Orange	Braintree	1969	Non-profit	95	Community	Individual On-Site	100 Year Flood Plain	2	
140	Northwind Mobile Home Park	Orange	Williamstown	1994	Non-profit	6	Municipal	Municipal	None	0	
255	Derby Mobile Home Park	Orleans	Derby	1998	Non-profit	102	Consecutive	Municipal	None	0	
135	Coburn Mobile Home Park	Rutland	Clarendon	1960	Non-profit	46	Community	Community On-Site	None	0	
142	Sandy Pines Mobile Home Park	Washington	East Montpelier	1970	Non-profit	56	Community	Community On-Site	None	0	
137	Deepwood Mobile Home Park	Windham	Brattleboro	1991	Non-profit	44	Consecutive	Municipal	100 Year Flood Plain	0	
246	Charette's Trailer Park	Windham	Dummerston	1954	Non-profit	14	Community		None	0	
32	Shady Pines Mobile Home Park	Windham	Westminster	1968	Non-profit	28	Community		None	0	
141	Olcott Falls Mobile Home Park	Windsor	Hartford		Non-profit	40	Municipal	Municipal	None	0	
145	Windy Hill Acres	Windsor	Weathersfield		Non-profit	74	Community	Community On-Site	None	0	
143	Riverside Mobile Home Park	Windsor	Woodstock		Non-profit	40	Municipal	Community On-Site	Floodway	36	
Total Mobile Home Communities						Total Lots	Total # of lots in flood hazard area				
18						1006	38				

Comments on H.556, page 1, line 10-20: Support for Flood Disclosure

We are supportive of flood disclosure as an addendum to lease agreements. This approach not only educates tenants about potential risks but also aligns with best practices in tenant information and protection. However, our support is coupled with a call for clarity on several fronts to ensure the legislation's practical and effective implementation:

- 1.) **Criteria for Determining Flood Risk:** Detailed guidance is needed on the tools and criteria to accurately assess flood risk, given the dynamic nature of weather events and their impact on flood zones.
- 2.) **Responsibility and Frequency of Determination:** Clarification on whether park owners are tasked with this determination and the expected frequency of updates would help in compliance planning.
- 3.) **Disclosure Content:** Specifications on what information the disclosure must include would ensure consistency and comprehensiveness across disclosures.
- 4.) **Impact on Insurance:** Guidance on how flood risk determination affects tenant and homeowner insurance options and requirements would aid in advising residents appropriately.
- 5.) **Flood Insurance Requirements:** If tenants or homeowners are mandated to obtain flood insurance for properties in flood zones, details on verification processes are essential.
- 6.) **Subletting Disclosures:** Clear directives on disclosure responsibilities in subletting situations are necessary to maintain transparency and safety.
- 7.) **Liability for Reliance on Outdated Flood Maps:** Protection for park owners acting in good faith on current maps, should flooding affect areas not designated as high-risk, is a significant concern.

Conclusion

Residents in mobile home communities often find themselves on the frontlines of environmental justice, grappling with the escalating challenges of a changing climate. The Mobile Home Task Force Report to the General Assembly highlights that 40% of mobile home communities are situated in flood hazard areas. H.556 represents a step toward safeguarding these communities by ensuring residents are informed about flood risks. We are in a housing crisis. If we further restrict the affordability of our existing supply, we need to be prepared to support these impacted communities at all levels.

Thank you,

Christopher Trombly
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