

Impact Communities Management is the property manager for the following communities in North Dakota:

Devils Lake Estates MHP & Pitcher Park North Manufactured Home Community	Devils Lake	ND
Grafton Manufactured Home Community	Grafton	ND
Larimore Manufactured Home Community	Larimore	ND
Minot MHP Manufactured Home Community	Minot	ND

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House Bill 1103: House bill 1103 is a costly and heavy-handed mandate overreaching the bounds of safety and compliance and we would like to voice our opposition to this legislation for the following reasons:

1. This bill allows for the North Dakota Department of Health to restrict the use of and development of lands in the State. Further, the department would not issue a license under this section if a proposed mobile home park, recreational vehicle park, or campground would prevent, interfere, or restrict proposed private development that is actively being pursued, all of which exclusively and unfairly target Manufactured Housing Community Owners and developers and thus limiting affordable housing options in the state.
2. The bill further restricts the expansion and use of the property. Under the proposed legislation, a Manufactured Housing Community Owner would not be allowed to establish, maintain, change use, mix use, or enlarge a mobile home park, RV park, or campground without obtaining a specific license to do so, a requirement not placed upon other housing sectors.
3. Under the bill, the North Dakota Department of Health will have the authority to deny the renewal of a license on basis of proposed development of private property. This would open the door to developers and competitors to use this provision in a means to unfairly force a Manufactured Housing Community out of business or to stop development of a new affordable housing community by denying them a license based solely on a proposed development that may or may not ever take place.
4. The bill also unfairly restricts the rights of Manufactured Home Community Owners by not allowing renewal of a license if the mobile home park, recreational vehicle park, or campground is not actively conducting business at the site. This does not take into account the future planning and redevelopment of the community that may take place while the community is not active.
5. The bill also has many costly mandates exclusively to Manufactured Community Owners such as, lot drainage and playground requirements, provision for service fees that are not defined that would have to be passed on to residents and further provides for the revocation of a license and penalty for operating without a license and does not currently define the guidelines.

Closing Comments: We hope that this letter provides some details that you may not have considered during your review of this bill. We also sincerely hope that you will take into consideration the business concerns we outlined, the potential unintended costs that would have be passed on to residents and how the bill unfairly targets Manufactured Housing Community Owners.