Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

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January 18, 2018

TO: Supervisor Sheila Kuehl, Chair
Supervisor Hilda L. Solis
Supervisor Mark Ridley-Thomas
Supervisor Janice Hahn
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FROM: Dennis Slavin
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REPORT ON BOARD MOTION REGARDING RENT STABILIZATION FOR MOBILEHOME PARKS (AGENDA ITEM NO. 4, OCTOBER 17, 2017)

On October 8, 2017, the Los Angeles County Board of Supervisors (Board) instructed the Acting Director of the Department of Regional Planning (DRP), in consultation with County Counsel and other relevant Departments, to report to the Board in writing within 60 days on the feasibility of a proposed ordinance that would protect mobilehome owners from unreasonable space rental adjustments while recognizing and providing guidelines to park owners to obtain a just and reasonable return on their property, addressing, at minimum, the following issues:

- Placing a cap on the amount by which a mobilehome park owner can increase the rent for a mobilehome park space in a given year;
- Protecting against elimination or reduction in services or maintenance by requiring a reduction in rent for a mobilehome park space;
- Prohibiting a park owner or manager from requiring any mobilehome owner or prospective mobilehome owner to sign a rental agreement with a term in excess of 12 months as a condition to residence in a mobilehome park;
- Providing a remedy to mobilehome park owners if they believe that they are not receiving a fair rate of return on their property;
- Requiring mobilehome park owners to complete an annual report providing information about occupancy, rental rates and uses of the mobilehome parks;
- Requiring that mobilehome park owners post the provisions of the proposed ordinance in the rental offices of the mobilehome parks and include the material terms of the ordinance in all rental agreements in the language in which the rental agreement is negotiated;

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- Developing an education and outreach program regarding the proposed ordinance for mobilehome park owners and tenants; and
- Engagement of all stakeholders in the feasibility discussion, including mobilehome park residents, mobilehome park owners and operators, and the mobilehome park industry association.

The Chief Executive Officer (CEO) was instructed to identify elements from the Tenant Protections Policy Development Framework (Framework) submitted to the Board on September 21, 2017, that are also applicable to mobilehome parks, which is included in this report.

INTRODUCTION

The primary focus of this report is on the feasibility of a local rent stabilization ordinance for the renting of mobilehome spaces in the unincorporated areas of Los Angeles County. Tenant protections for renters of mobilehome units are addressed by the County's Framework, which is discussed below. As of October 2017, the California Department of Housing and Community Development (HCD) reports that there are 86 mobilehome parks and 8,503 mobilehome spaces in the unincorporated areas. This report discusses the applicability of rent stabilization in mobilehome parks to the Framework; including background information on mobilehome parks in the unincorporated areas; stakeholder perspectives; and provides recommendations, should the Board decide to proceed with an ordinance. The report was developed jointly between the CEO, Community Development Commission, County Counsel, Department of Consumer and Business Affairs (DCBA), and DRP.

APPLICABILITY TO TENANT PROTECTIONS POLICY DEVELOPMENT FRAMEWORK

On September 21, 2017, in response to a motion by Supervisors Solis and Kuehl, the CEO submitted the Framework. The Framework includes a review of state and federal laws and regulations pertaining to the County's ability to regulate the private rental market, as well as a review of best practices implemented by other jurisdictions designed to protect tenants. Additionally, the Framework includes an analysis of private rental housing stock and commercial properties for lease, however, the Framework did not specifically analyze the mobilehome parks' private rental housing stock.

Applicability of Framework to Mobilehomes

Several elements of the Framework are relevant to mobilehome park tenants. In developing the original Framework, the CEO worked with County Counsel to provide a legal analysis of state and federal laws and regulations that would authorize or constrain the County's ability to regulate the private rental market. A preponderance of this analysis holds true for mobilehome homeowners who rent the space in their mobilehome park as

well. Should the Board elect to adopt a comprehensive tenant protection ordinance, the Board could include tenant protections for mobilehome tenants as part of this comprehensive ordinance, similar to what the cities of Los Angeles and Santa Monica have done.

The CEO noted several common elements across rent level protection programs in its Framework. These common elements may be applicable to any rent level protections instituted for mobilehomes in the unincorporated areas. Of note for mobilehome parks is that, generally speaking, rent level protections have been instituted to ensure proper maintenance of the rented area and common areas, and to ensure that there is a rent decrease process should these amenities be removed, and an increase process based on a "return on investment" analysis.

This general Framework is applicable to mobilehome parks to safeguard the agreed upon amenities and maintenance of common areas for tenants. The Board may elect to create both maintenance requirements and a "rent decrease" process for space tenants when they can demonstrate that amenities provided for at lease signing are no longer being provided.

The Framework also explains that for a tenant protections program to effectively control rent levels, jurisdictions typically pair rent level protections with eviction protections, or "just cause" ordinances, laying out specific reasons why a landlord can initiate eviction proceedings. The Framework finds that eviction protections without rent level protections still allow landlords to increase the rent to a level unaffordable to the tenant, thereby circumventing the eviction process. Therefore, the Board could consider a mobilehome residency ordinance that provides rent level protections and eviction protections, and does not conflict with the provisions of the State's Mobilehome Residency Law (MRL) as defined below.

Additionally, the Framework explains that many local jurisdictions have added harassment protections to rent level protections as a means to protect tenants whose landlord is operating in a "harassing" manner in an effort to have the tenant voluntarily vacate the premises. These tactics could involve a landlord's refusal to perform necessary repairs at a mobilehome park, intimidation tactics, or excessive three-day notices to perform covenants of the lease. Anti-harassment provisions could be considered as an element of a mobilehome residency ordinance.

Relocation assistance is another tenant protection used in a majority of local jurisdictions that the CEO surveyed in crafting its Framework. An ordinance could require relocation payments to a tenant when they are evicted due to no fault of their own. The amount of relocation assistance required may be set by the local jurisdiction. Any relocation assistance provision would need to be consistent with the MRL, which addresses permissible grounds for eviction from a mobilehome park, as well as the Subdivision Map

Act, as discussed below, and which addresses mitigation of impacts to displaced mobilehome residents.

BACKGROUND

Mobilehome Regulatory Framework and Resources

State Law

Mobilehomes and mobilehome parks are regulated by several state laws. Mobilehome tenancies and landlord-tenant relations are primarily governed by the MRL (Civil Code § 798 et seq.), which is discussed in detail below. To a lesser extent, four other state laws regulate mobilehomes and mobilehome parks as follows:

- The Mobilehome Parks Act[1] regulates the construction, maintenance, occupancy, use, design, and operation of mobilehome parks.
- The Manufactured Housing Act of 1980[2] regulates the sale, licensing, registration, and titling of mobilehomes.
- The Subdivision Map Act[3] governs the creation of a subdivision from the conversion of a mobilehome park. The act requires the subdivider to report on the impact of the conversion on displaced park residents and authorizes the local legislative body to require the subdivider to take steps to mitigate the adverse impact of the conversion on the ability of displaced park residents to relocate their mobilehomes.[4] In the case of a subdivision created from the conversion of a rental park to an ownership residency, the Act imposes limits on rent increases for non-purchasing residents as rents transition from pre-conversion amounts to market levels.[5]
- Another state law, comprising Government Code, Sections 65863.7-65863.13, governs mobilehome park closures and conversions not involving the creation of a subdivision. Section 65863.7 prescribes steps that must be taken before a conversion or closure application can be approved by the local legislative body of a local jurisdiction. Furthermore, the Act authorizes the local legislative body to require the park owner to take steps (whose costs cannot exceed the reasonable costs of relocation) to mitigate the adverse impact of the closure or conversion on the ability of displaced park residents to relocate their mobilehomes.[6]

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[1] Health & Saf. Code § 18200 et seq.

[2] Health & Saf. Code § 18000 et seq.

[3] Gov. Code § 66410 et seq.

[4] Gov. Code § 66427.4.

[5] Gov. Code § 66427.5.

[6] Gov. Code § 65863.7(e).

Mobilehome Residency Law: Enacted in 1978 and amended several times since, the MRL establishes the rights and responsibilities of mobilehome residents and mobilehome park owners. Recognizing the unique characteristics of a mobilehome tenancy, the State Legislature declared that the MRL was enacted to provide unique protection to mobilehome owners from actual or constructive eviction resulting from the high cost of moving mobilehomes, the potential for damage resulting from moves, the requirements for installation, and the cost of landscaping and lot preparation for a mobilehome.[7]

In most cases, mobilehome park residents own their homes but rent the spaces they occupy. Because of the difficulty of relocating a mobilehome, a mobilehome owner is more likely to be a long-term resident, therefore, the MRL provides homeowners a measure of stability and predictability in their mobilehome park residency.[8] The MRL regulates the content of mobilehome rental agreements, requirements for notices of rent increases, fees and charges recoverable from a tenant for certain services and utilities, security deposits, and grounds for termination of leases and eviction.

Tenancies Subject to a Local Rent Control Ordinance: Although the MRL extensively regulates mobilehome park tenancies, it does not entirely preempt local regulation of the field. Local regulations are valid as long as they are consistent and not in conflict with the MRL or other applicable state statutes.[9] The MRL does not prohibit local jurisdictions from enacting rent control for mobilehome parks,[10] however it exempts a significant number of rentals from locally imposed rent control, as follows:

- New Construction Exemption: Newly constructed spaces initially offered for rent after January 1, 1990, are exempt from local rent control regulations;[11]
- Long-Term Lease Exemption: A tenancy with a term exceeding 12 months, entered into between park management and a homeowner for the homeowner's personal residence, is exempt from local rent control regulations; and.[12]
- Non-Principal Residence Exemption: With a few limited exceptions, a mobilehome space is exempt from local rent control regulations if the mobilehome is not the homeowner's principal residence and the homeowner has not rented the mobilehome to another party.[13]

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[7] Civil Code § 798.55(a).

[8] *SC Manufactured Homes, Inc. v. Canyon View Estates, Inc.* (2007) 148 Cal.App.4th 663, 673.

[9] *Cacho v. Boudreau* (2007) 40 Cal.4th 341, 348.

[10] *Id.* at p. 350.

[11] Civ. Code §§ 798.7 and 798.45.

[12] Civ. Code § 798.17.

[13] Civ. Code § 798.21(a).

Thus, any rent control ordinance enacted by the Board would apply only to rentals as follows: (1) the space was initially offered for rental on or before January 1, 1990; (2) the rental term does not exceed 12 months; and (3) the space contains a mobilehome that is the homeowner's principal residence or, if not the homeowner's principal residence, that the homeowner has rented out to another party.

Vacancy Decontrol: Under the Costa-Hawkins Rental Housing Act,[14] vacated housing units lose coverage by local rent control laws.[15] The change in coverage triggered by a vacancy is called "vacancy decontrol." However, possibly with exceptions, the Costa-Hawkins Rental Housing Act does not apply to mobilehome tenancies.[16] Therefore, a park space does not lose rent control coverage under a local ordinance after a transfer takes place.

Los Angeles County Code

Title 8: Effective January 1988, the Board enacted a mobilehome regulation ordinance, County Code, Chapter 8.57, which regulated rent increases for mobilehome spaces. The ordinance, enacted with a seven-year sunset date, terminated in January 1995 because of insufficient votes to extend its operation.[17] The County ordinance: (1) limited rent increases to 75 percent of the Consumer Price Index annually, or no more than eight percent; (2) allowed for specified park owner costs to be passed through to homeowners; (3) established a mobilehome park adjustment commission; (4) provided specified rights for homeowners; and (5) imposed penalties for violations, including for retaliatory actions by park owners. Chapter 8.57 also required park owners to submit reports addressing the impact of a park conversion or closure on displaced persons, and to take steps to mitigate any adverse impact.[18]

Title 21: The Subdivision Code requires that any area or tract of land designed to accommodate mobilehomes used for human habitation will be approved as a division of land for mobilehome purposes and for which a final map or parcel map has been recorded.

Title 22: The Zoning Code requires a Conditional Use Permit (CUP) for all mobilehome parks. Section 22.52.500 includes provisions for regulating mobilehome parks. The

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[14] Civ. Code § 1954.50 et seq.

[15] Civ. Code §§ 1954.52, 1954.53.

[16] Civ. Code § 1754.51(b), excluding park owners and operators from the definition of "owner."

[17] County Code § 8.57.220.

[18] County Code §8.57.300.

provisions include but are not limited to density, access, design, parking, driveways, signage in commercially-zoned properties, use restrictions, and permit renewals.

Agencies

California Department of Housing and Community Development: HCD develops and enforces regulations regarding the construction, occupancy, sales, and registration and titling of mobilehomes; and develops and enforces regulations related to the construction, maintenance and operation of mobilehome parks. HCD does not enforce the MRL. However, HCD can enforce other laws related to mobilehome park occupancy and operations, such as the Mobilehome Park Act and the Special Occupancy Parks Act.

Los Angeles County Department of Consumer and Business Affairs: DCBA provides tenant protection by educating tenants, mobilehome owners, and landlords about their rights and responsibilities under the law. DCBA accomplishes this through the following services:

- Consumer Education and Public Outreach: DCBA hosts or participates in various town hall meetings to provide information, answer questions, and receives tenant complaints as appropriate. Additionally, DCBA publishes tip sheets, brochures, and provides information on our website and through social media.
- Consumer Counseling: DCBA provides one-to-one consumer counseling via telephone, e-mail, or in-person consultations. This service provides tenants the opportunity and time to explain the problem, circumstances, and desired outcome. DCBA staff then works with the tenant to formulate a plan to resolve the issue.
- Complaint Referrals: After fully understanding the problem, DCBA may need to refer tenants to an appropriate agency such as The Office of the Mobilehome Ombudsman Mobilehome Assistance Center, local code enforcement, or a lawyer referral service for legal counsel.
- Dispute Resolution: DCBA has a cadre of professionally-trained, neutral, unbiased mediators that can help resolve disputes between neighbors, residents, and mobilehome parks owners as appropriate.
- Small Claims Court Advisor: DCBA assists disputing parties file claims for monetary damages regarding contract disputes, landlord/tenant disputes, personal injury, property damage, theft, trespass, nuisance, and other disputes as appropriate.

Los Angeles County Department of Regional Planning: DRP performs all land use planning functions for the unincorporated areas of Los Angeles County. DRP develops, implements, and enforces land use and zoning policies related to mobilehome parks. This may include processing a CUP, and renewals and time extensions for CUPs. In the event of a mobilehome park closure, DRP also makes recommendations for mobilehome park

closure impact reports. In addition, DRP is responsible for enforcing the provisions of the CUP and Title 22. Furthermore, DRP also writes long range zoning and land use policies. In the future, the Board may consider the development of policies that promote the preservation of existing mobilehome parks, which serve as a source of naturally occurring affordable housing in many unincorporated communities.

Los Angeles County Community Development Commission/Housing Authority of the County of Los Angeles (HACoLA): HACoLA's Section 8 Payment Standard for the space rent in a mobilehome park is $602 per month. It is slightly more under the veteran program, which puts the space rent at $775 per month. This is what will be paid to the owner of the mobilehome to subsidize the space rent. HACoLA will also provide a Section 8 voucher for someone that wants to rent a mobilehome. There are currently only 14 Section 8 voucher holders that rent mobilehomes. These voucher holders are not the owners of the mobilehome, but renters of the unit.

Profile of Mobilehome Parks in the Unincorporated Areas

Number of Mobilehome Parks

Mobilehome Park, as defined by Civil Code Section 798.4, is an area of land where two or more mobilehome sites are rented or held out for rent for mobilehomes, as defined by Civil Code Section 798.3.

As of October 2017, there are a total of 86 mobilehome parks, and a total of 8,503 mobilehome spaces in the unincorporated areas. Of the 86 parks, four are known to be resident-owned mobilehome parks, totaling 754 mobilehome spaces. Seven out of the 86 parks also include recreational vehicle spaces. All rental mobilehome parks have been established before 1990.

For more information, please see Attachment 1 of this report.

Number of Mobilehome Complaints

According to DCBA, the County received 34 complaints in the past three and a half years related to mobilehomes. As shown in Table A, the complaints ranged in issues from unfair rent increases to rights regarding repairs. It should be noted that not all tenants and owners will issue complaints with DCBA, and the complaints may or may not relate to space rent issues.

TABLE A: DCBA MOBILEHOME COMPLAINTS FROM JULY 2014- DECEMBER 2017 (3.5 YEAR SPAN)

GENERAL DESCRIPTION	NUMBER OF COMPLAINTS
RENTAL ISSUES Payment method charges fees to tenants; unfair rent increases; rent increases without proper notice; rental agreements not honored	10
TENANT OR OWNER RIGHTS Rights regarding repairs, additions, sub-letting or sub-leasing	12
TAX ISSUES Transient Occupancy Taxes (TOT) incorrectly charged, client wants refund	10
MISCELLANIOUS Client did not receive copies of mobilehome related documents, i.e. title; insurance check	2
TOTAL NUMBER	34

Source: DCBA, 2017

Survey of Mobilehome Space Rents in Los Angeles County

Rents for mobilehome spaces vary significantly, from as low as $310 a month in the City of Carson, to $1,900 a month in the San Pedro neighborhood in the City of Los Angeles-San Pedro, as shown in Table B. In addition to space rent costs, homeowners and residents may also be subject to fees for utilities, amenities, security, property taxes, etc. For a more detailed analysis of advertised space rents, please refer to Attachment 2 of this report.

TABLE B: SURVEY OF ADVERTISED MOBILEHOME MONTHLY SPACE RENTS IN LOS ANGELES COUNTY, BY GENERAL PLAN AREA, DECEMBER 2017

GENERAL PLAN AREA	LOWEST SPACE RENT	HIGHEST SPACE RENT
Antelope Valley	$350/Lancaster	$515/Palmdale
East San Gabriel Valley	$484/Azusa	$1,250/Unincorporated San Jose Hills
Gateway	$621/Unincorporated West Whittier- Los Nietos	$1,360/Long Beach
San Fernando Valley	$607/Los Angeles-Chatsworth	$935/Los Angeles-Woodland Hills
Santa Clarita Valley	$705/Santa Clarita-Newhall	$1,172/Santa Clarita-Canyon Country
South Bay	$310/Carson	$1,900 Los Angeles-San Pedro
West San Gabriel Valley	$695/Duarte	$1,200/El Monte

Source: Search on MHVillage.com for mobilehome units for sale in Los Angeles County and on SpaceRentGuide.com for average space rents in December 2017.

STAKEHOLDER PERSPECTIVES

The following individuals and organizations submitted comments, which can be found in Attachment 3 of this report:

1. Mary Jo Baretich, Golden State Manufactured Owners League (GSMOL)
2. Donalea Bauer, Lordon Management
3. BizFed
4. Shandra BP-Weeks, Manufactured House Action (MHAction)
5. David Delaplane, Owner, Woodland Park Mobiles Estates
6. Dan Fischer, Owner, Golden State Mobile Lodge
7. Jarryd Gonzales, Western Manufactured Housing Communities Association
8. Charles Keith, Owner of Mobilehome Park
9. Manyin Li, Resident, Rowland Heights Mobile Estates
10. Ken Meng, President,1441 Manufactured Home Residents Association (MRA1441)
11. Sandra Sierra, Rowland Heights Mobile Estates
12. Frank A. Wodley, Mobilehomes Owners Network, *Mobilehome Magazine*

Comments include support for and concerns over establishing a new rent stabilization policy for the unincorporated areas. Comments in support describe the effort as a way to put residents on a fair playing field with park owners, and that rent stabilization for mobilehome parks will help combat homelessness and the displacement of low income households and seniors on fixed incomes. Those who express concerns indicate that park owners will face unintended consequences, such as the inability to invest and maintain their properties, or to even keep their parks open. Some even point to the fact that many residents may be on long-term leases that are not subject to rent stabilization, and that the implementation of any rent stabilization will entail major administrative costs and the allocation of significant resources.

Should the County move forward with establishing a rent stabilization policy for mobilehome parks, other recommendations include the exclusion of resident-owned communities, and the importance of stakeholder involvement in the development and implementation of the policy.

Furthermore, some commenters indicate a need to strengthen and enforce tenant protections in mobilehome parks. Some indicate that compared to park owners, homeowners do not have access to resources and representation to address violations of the MRL, and there is a need for an administrative body that can review lease agreements, take in resident complaints, and have the authority to conduct investigations and make corrections.

RECOMMENDATIONS

Should the Board move forward to initiate a rent stabilization ordinance for mobilehome parks in the unincorporated areas, staff recommends the following considerations to ensure feasibility. These recommendations should be considered and coordinated with the ongoing development of the Framework.

1. Amend the County Code

Reviving the rent control aspect of the previous Mobilehome Park Regulation Ordinance in Title 8 would require modifications to ensure that the ordinance is not in conflict with the MRL or any other applicable state mobilehome laws. The field of mobilehome law is highly specialized. Further analysis is recommended to properly draft such an ordinance.

Annual Space Rent Cap

A county can make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws.[19] Except for rentals exempted by the MRL, mobilehome tenancies are subject to local rent control ordinances. As long as a local rent control ordinance is not in conflict with the MRL or any other applicable state law, and the ordinance provides due process for mobilehome park owners, allowing just, fair, and reasonable rent increases, the County can establish rent control that places an annual cap on rent increases for a mobilehome space.

Protections Against Impact to Services and Maintenance with Reduced Space Rents

A rent control ordinance could require a rent reduction when services or maintenance is reduced. Courts have generally upheld a local jurisdiction's ability to require a reduction in rents when there has been a finding that services or maintenance has been reduced.[20] The due process mechanism required for rent adjustments—a hearing before an impartial fact finder, such as a rent adjustment commission or hearing officer—could also be used to enforce the ordinance. If a homeowner filed a complaint alleging that services or maintenance had been reduced, a rent adjustment commission or hearing officer could serve as a fact finder, ordering a rent reduction if warranted.

Prohibitions for Requiring Long Term Rental Agreements in Excess of 12 Months

Because a tenancy with a term exceeding 12 months is exempt from local rent control, the rental term offered to a homeowner is particularly important. There are three possible term options under the MRL: (1) a 12-month lease, which would be subject to local rent control; (2) if requested by the homeowner, a shorter-term lease (including a month-to-month tenancy), which also would be subject to local rent control; and (3) if mutually

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[19] Cal. Const., art. XI, § 7.

[20] *Sterling v. Santa Monica Rent Control Bd.* (1985) 168 Cal.App.3d 176, 183-184.

agreed on by the homeowner and park management, a long-term lease exceeding 12 months, which would *not* be subject to local rent control.[21] If the homeowner selects a term of 12 months or less (including month to month), the rental agreement for the selected term must contain the same rental charges, terms, and conditions during the first 12 months as the offered lease with a term exceeding 12 months.[22] Since a homeowner can reject a lease with a term exceeding 12 months for a shorter-term lease with the same charges, terms, and conditions, a homeowner is not forced to select a longer-term lease to receive more favorable lease terms. In this way, the MRL protects a homeowner from being forced to sign a lease with a term in excess of 12 months—a lease that, under the MRL, would be exempt from local rent control. Both Civil Code, Sections 798.17 and 798.18, which provide protection from being forced to sign a long-term lease, use the term "homeowner," but not "prospective homeowner." Since they do not mention a prospective homeowner, it is unclear if they apply to a prospective homeowner. No appellate court has ruled on the issue, but there appears to be no barriers to enacting a local ordinance that would apply the protections under Sections 798.17 and 798.18 to a prospective homeowner.[23]

Remedies for Park Owners Who Believe They are Not Receiving a Fair Rate of Return on Their Property

Any ordinance establishing maximum rent increases for mobilehome spaces must protect the due process rights of mobilehome park owners, ensuring that they receive a fair rate of return on their properties. Courts have invalidated rent control ordinances lacking an adequate procedural mechanism protecting the property rights of landowners. Generally, a determination of what is just, fair, and reasonable would include a consideration of a number of factors, including, but not limited to, the effects of inflation, adjustments for artificially low or high rents, capital improvements, and increases in insurance and taxes.[24] A rent adjustment commission or hearing officer with the authority to conduct hearings on disputes and make determinations for increases on a case-by-case basis by consideration of these factors would likely provide an adequate procedural mechanism.

Requirements for Park Owners to Complete an Annual Report on Occupancy, Rental Rates, and Use of Parks

When there is no legislative intent by the state to exclusively control a certain field of law, local authorities are free to adopt ordinances supplementing State legislation.[25] If a local

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[21] Civ. Code § 798.18(a). A homeowner must be given at least 30 days from the date a rental agreement is first offered to accept or reject the rental agreement. (Civ. Code § 798.17(b)(3).)

[22] Civ. Code § 798.17(c).

[23] A local legislative body that has enacted a mobilehome rent control ordinance cannot enact or enforce an ordinance limiting the duration of rental agreements or leases for mobilehome spaces built or initially offered for rent after January 1, 1993. (Gov. Code § 65852.11.)

[24] *Kavanau v. Santa Monica Rent Control Bd.* (1997) 16 Cal.4th 761, 772.

[25] *Lowe v. City of Commerce* (1997) 59 Cal.App.4th 1075.

agency determines that specified information from mobilehome park owners or operators is necessary to properly administer its rent control ordinance, it can lawfully enact an ordinance requiring such reporting.[26]

Requiring Posting of the Rent Control Ordinance in the Rental Office and Inclusion of Material Terms of the Ordinance in Rental Agreements

Under the MRL, a mobilehome park space rental agreement must include a copy of the MRL and specified notices.[27] The MRL also provides that if the mobilehome park space agreement is exempt from local rent control laws, the agreement must include a clause at the beginning of the agreement informing the parties that the agreement is exempt from local rent control. It further prescribes the procedure for a potential or new mobilehome owner to void a rental agreement that is exempt from local rent control. Although a rental agreement can include the aforementioned provisions as well as other provisions permitted by law, it does not need to include *specific language* contained in state or local laws other than the MRL.[28] Therefore, an ordinance could require the inclusion of material terms—but not specific language—of the ordinance in rental agreements. Furthermore, nothing in the MRL would prohibit an ordinance requiring the posting of a rent control ordinance in the mobilehome park rental office.

2. Establish a Rent Adjustment Commission and/or Hearing Officer

A feasible ordinance will require the establishment of a rent adjustment commission and/or hearing officer. This commission and/or hearing officer could be housed in the Executive Office of the Board, placed within an existing County department with experience in resolving landlord tenant disputes, or established as an independent entity. In addition to the authority contained in the ordinance, the commission and/or hearing officer could hold regularly scheduled meetings that are open to the public to discuss and make recommendations on policy and program initiatives, and take comment from members of the public on emerging issues facing mobilehome park owners and tenants.

The County's previous mobilehome park regulation ordinance established a mobilehome park adjustment commission, as well as a hearing process to evaluate rent increases proposed by the mobilehome park owner. The ordinance also allowed for formula increases and certain pass through costs, which necessitated approval by the mobilehome park adjustment commission as a matter of course. The previous pass-throughs must be re-evaluated for possible conflicts with the MRL, which addresses pass-throughs and local jurisdictions in detail.

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[26] *Miller v. Murphy* (1983) 143 Cal.App.3d 337, 341-342, which held that San Francisco could adopt an ordinance requiring pawnbrokers to report information to the police chief in addition to other information required to be reported by pawnbrokers by State law.

[27] Civ. Code §§798.15 and 798.17(a)(2).

[28] Civ. Code §798.16(a).

Re-establishing a rent adjustment commission and/or hearing officer to evaluate whether rent increases or decreases are justified and appropriate could be a key component to protect the due process rights of mobilehome park owners and mobilehome space renters alike.

3. Implement an Education and Outreach Program

If the Board chooses to move forward with an ordinance, staff recommends the development of an education and outreach program. Effective public policy is dependent on hearing from the people directly impacted by the policy. DCBA proposes to conduct a series of roundtable discussions in each Supervisorial District comprised of tenants, mobilehome owners, landlords, property owners, and community members to discuss a framework for a potential ordinance. DCBA also proposes to develop an online instrument that allows stakeholders who could not attend a roundtable discussion the opportunity to submit their comments through the internet. DCBA further proposes to host through its Consumer Affairs Advisory Commission a series of public hearings throughout the unincorporated areas to record and catalog public comments to help inform the drafting of the ordinance.

4. Conduct A Comprehensive Analysis of Mobilehome Parks

Staff recommends that the development of an ordinance include a comprehensive analysis of mobilehome park characteristics that includes, but is not limited to: profile of owners and renters of mobilehome units, mobilehome park owners, and land owners; and an analysis of real estate market conditions that impact mobilehome parks.

CONCLUSION

Should you have any questions about this report, please contact Connie Chung, General Plan and Housing Section at cchung@planning.lacounty.gov or (213) 974-6417.

DS:MC:CC:ems

c: Executive Office, Board of Supervisors
Chief Executive Office
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Attachment 1: Mobilehome Parks, Unincorporated Areas, Los Angeles County, Oct 2017
Attachment 2: Survey of Advertised Mobilehome Monthly Space Rents in Los Angeles County, by General Plan Area, Dec 2017
Attachment 3: Stakeholder Comments

ATTACHMENT 1

Mobilehome Parks, Unincorporated Areas, Los Angeles County

	Supervisorial District	Name	Spaces
1	1	Covina Hills Mobile Cc	500
2	1	Crest Mobile Manor	141
3	1	Elms Mobile Manor	45
4	1	La Puente TP	12
5	1	Parkers TP	38
6	1	Rancho La Puente	97
7	1	Rancho La Seda	104
8	1	Rancho San Jose M.H.C.	61
9	1	Royal Palms Trailer Lodge	38
10	2	Alondra Trailer Park	23
11	2	Bonnies TP	8
12	2	Coast MHP	95
13	2	Compton Knolls Partners	28
14	2	Del Amo Mh Estates	512
15	2	Dominguez Hills Estates	525
16	2	Garden State TP	20
17	2	Golden State Mobile Lodge	53
18	2	Harbor TP	34
19	2	Idle Wheels TP	20
20	2	Lido MHP	28
21	2	Normandie Mobilehome Park	54
22	2	Palm MHP	66
23	2	Rainbow MHP	52
24	2	San Rafael Mobile Home Estates	470
25	2	Santa Fe MHP	24
26	2	Sarapas MHP	16
27	2	S K MHP	44
28	2	Starlite TP	75
29	2	Star Mobilehomes	30
30	2	Thrifty TP	35
31	2	Torrance Gardens MHP	62
32	3	Blue Dude Mobile Estates	13
33	3	Crockers Trailer Ct	13
34	3	Seminole Springs MHP (ownership)	220
35	3	Top O Topanga HOA (ownership)	224
36	3	Woodland Park Mobile Estates	199
37	4	Candlewood	91
38	4	Hacienda Mobile Home Park	56
39	4	Hi Lea Village Mobile Home Park	188
40	4	Rowland Heights Mobile Estates	327
41	4	Whittier Downs MHP	75
42	4	Whittier Mobile Country Club	188
43	4	Wildwood Mobile Cc	456

(continued on next page)

Mobilehome Parks, Unincorporated Areas, Los Angeles County (continued)

	Supervisorial District	Name	Spaces
44	5	Acton Country MHP	25
45	5	Alpine Springs MP	52
46	5	Antelope Center Trailer Park	16
47	5	Antelope Desert TP	15
48	5	Arrow Glen Manor LLC	102
49	5	Blue Skies Living	20
50	5	Blue Star Mobile Home Park	186
51	5	Camp Williams	44
52	5	Canyon Country Mh Estates	101
53	5	Country Mobile Estates	87
54	5	Crescent Valley	87
55	5	Forest TP	7
56	5	Gemstone MHP	34
57	5	Hasley Canyon Mobile Estates	113
58	5	Hillcrest MHP	18
59	5	Lakehills Estates	115
60	5	Lancaster Park	21
61	5	L.A. Young-Nak Presbyterian Retreat Center	17
62	5	Leisure Lake MHP	211
63	5	Lily Of The Valley	181
64	5	Loma Linda TP	19
65	5	Live Oak MHP	56
66	5	Mint Canyon Mobile Manor	27
67	5	Mitchell's Avenue E Park, Inc.	24
68	5	Mountain View	11
69	5	Mountain View Mobile Estates (ownership)	156
70	5	Oakgrove Family Park LLC	37
71	5	Orange Grove TP	45
72	5	Orchard Green MHP	44
73	5	Paradise Ranch MHP	94
74	5	Quartz Hill Mobile Home Park	260
75	5	Royal Palms MHP	166
76	5	Sierra Heights MHP	123
77	5	Stallion Meadows (ownership)	154
78	5	Storybook Park	15
79	5	Summit MHP	203
80	5	Telstar MP	30
81	5	The Villagers Mobile Home Park	14
82	5	Village Mobilehome Park	34
83	5	Vista Del Monte Mobile Home Park	87
84	5	Walnut Grove MP	51
85	5	White Rock Lake	21
86	5	Winterhaven MHP	20
		TOTAL	8503

Source: State Department of Housing and Community Development, 10/2017 and DRP GIS Section.

ATTACHMENT 2

Survey of Advertised Mobilehome Monthly Space Rents in Los Angeles County, by General Plan Area

General Plan Area	Name	Jurisdiction/Location	Space Rents	Age Restricted	Supervisorial District
Antelope Valley	Boulders at Ranch I	Palmdale	$400		5
	Boulders at Ranch II	Palmdale	$400		5
	Boulders at the Lake	Palmdale	$400		5
	Hacienda Mobile Estates	Lancaster	$350		5
	Mountain View Estates	Palmdale	$505-$515		5
East San Gabriel Valley	Azusa Mobilehome Park	Azusa	$484		1
	Caravan Mobile Home Park	Azusa	$575		1
	Charter Oak Mobile Estates	San Dimas	$800	X	5
	Cienega Valley Mobile Estates	San Dimas	$1,150-$1,200	X	5
	Covina Hills MHC	Unincorporated San Jose Hills	$1,029-$1,250		1
	Crest Mobile Manor	Unincorporated North Pomona	$625-$675		1
	Foothill Vista Mobile Home Park	Azusa	$790	X	1
	Hilea Park	Unincorporated Rowland Heights	$750-$825		4
	King's Way Gardens	La Verne	$990-$999		5
	Park Vista Estates	Pomona	$1,000		1
	Pomona Islander	Pomona	$825		1
	Rancho San Jose M.H.C.	Unincorporated Charter Oak	$855		5
	Rowland Heights Mobile Home Park	Unincorporated Rowland Heights	$920-$1000		4
	Royal Palms Mobile Home Park	Unincorporated Charter Oak	$875		5
	Starlite Mobile Estates	Covina	$935-$941		5
	Sylvan Villa MHP	Azusa	$800		1
	The Fountains	La Verne	$795	X	5
	Tumbling Waters Mobile Home Park	Covina	$965		5
	Walnut Creek Mobile Estates	Walnut	$789		4
	Walnut Hills Mobile Home Community	Walnut	$950		1
	Westland Estates Pomona Mobile Home Park	Pomona	$950		1
	Wildwood Mobile Country Club	Unincorporated Hacienda Heights	$900-$1,175		4
Gateway	Bellwood MHP	Bellflower	$650	X	4
	Belmont Shores	Long Beach	$1,230-$1,235	X	4
	Californian Mobile Estates	Paramount	$1,169		4
	Candlewood	Unincorporated South Whittier-Sunshine Acres	$650	X	4
	Cinderella Mobile Home Park	Paramount	$810	X	4
	Del Amo Mobile Home Estates	Unincorporated Rancho Dominguez	$854-$980		2
	Dominguez Hills Estates	Unincorporated Rancho Dominguez	$950-$1,250		2
	Friendly Village	Long Beach	$1,350-$1,360		4
	Lakeland Villa Inc.	Santa Fe Springs	$680	X	4
	Lake Park La Mirada	La Mirada	$1,078	X	4
	Robins Mobile Home Park	Bellflower	$775		4
	Thunderbird Villa Mobile Home Park	South Gate	$756	X	1
	Whittier Downs Mobile Home Park	Unincorporated West Whittier-Los Nietos	$1,260	X	4
	Whittier East Community	Whittier	$740		4
	Whittier Mobile Country Club	Unincorporated West Whittier-Los Nietos	$621-$728	X	4
	Villa Park Mobile Homes and Long Beach Estates	Long Beach	$925		4
San Fernando Valley	Canoga Mobile Estates	Los Angeles/Canoga Park	$895	X	5
	Kona Kai Mobile Village	Los Angeles/Canoga Park	$824	X	3
	Northridge Estates	Los Angeles/Northridge	$807	X	3
	Oakridge Mobilehome Park	Los Angeles/Sylmar	$656-$902		3
	Sierra Springs Village	Los Angeles/Van Nuys	$878-$910		3
	Sunburst Park Mobile Home Estates	Los Angeles/Chatsworth	$607	X	5
	Woodland Park Mobile Estates	Los Angeles/Woodland Hills	$935		3
Santa Clarita Valley	Cordova Mobile Estates	Santa Clarita/Canyon Country	$818-$832		5
	Greenbrier Mobile Estates East	Santa Clarita/Canyon Country	$918	X	5
	Hasley Canyon Mobilehome Park	Unincorporated Santa Clarita Valley	$910		5
	Lily of the Valley Mobile Home Village	Unincorporated Santa Clarita Valley	$907		5
	Parklane Mobile Estates	Santa Clarita/Canyon Country	$1,172		5
	Polynesian Mobile Home Park	Santa Clarita/Newhall	$705		5
South Bay	Carson Harbor Village	Carson	$565-$689	x	2
	Crestview Lodge for Mobilehomes	Lomita	$580	X	4
	Del Amo Gardens Mobilehome Estates	Torrance	$975-$985		4
	El Rancho Verde	Los Angeles/Harbor City	$950		4
	Gardena Villas	Gardena	$830		2
	Harbor City MHP	Los Angeles/Harbor City	$1,100		4
	Palos Verdes Rancho Mobile Home Park	Los Angeles/Harbor City	$888-$1,111	X	4
	Palos Verdes Shores MH and Golf Community	Los Angeles/San Pedro	$1,622-$1,900	X	4
	Paradise Trailer Lodge	Carson	$310		2
	Park Avalon Mobile Estates	Carson	$319		2
	Rolling Hills Trailer Park	Lomita	$765		4
	San Rafael Mobile Home Estates	Unincorporated West Carson	$825	X	2
	Southwood Mobile Estates	Torrance	$850		4
	Skyline MHP	Torrance	$1,015-$1,170	X	4
	Tree Lane Mobile Park	Duarte	$695-$795	X	5
	Vera Carson Mobile Home Estates	Carson	$350	X	2
West San Gabriel Valley	Baldwin Mobile Park	Baldwin Park	$795		1
	Brookside Mobile Country Club	El Monte	$1,200		1
	Vista Del Monte Mobile Home Park	Unincorporated South Monrovia Islands	$975	X	5

Source: Search conducted on MHVillage.com for mobilehome units for sale in Los Angeles County and on SpaceRentGuide.com for average space rents in December 2017. Note that owners and residents may be subject to additional fees for utilities, amenities, security, property taxes, etc.

Key: Unincorporated

ATTACHMENT 3

Connie Chung, AICP
Supervising Regional Planner,
General Plan Development and Housing Section
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Dear Connie,

I would like to thank the Board of Supervisors for their support to study the proposed Rent Stabilization Ordinance (RSO) for mobile home parks. I was very impressed with all the Supervisors' handling of this issue at the Supervisor's meeting on October 17, 2017.

I would also like to thank them for the marvelous work that they have been doing to protect all the vulnerable people in the unincorporated areas of LA County. Our Golden State Manufactured-home Owners League, Inc. (GSMOL) Region Managers and Associate Managers have been working diligently in LA County to assist the mobilehome homeowners to learn their rights per the law, and to not be afraid to stand up for those rights against park owners and managers who violate these laws. Empowering the residents instills pride and strength to attain and retain their quality of life. We assist them in working out mediation with the park owners and management, and if necessary, to process Small Claims actions and assist them in finding pro bono attorneys familiar with the Mobilehome Residency Law, Civil Code 798.

I mentioned in my speech that our GSMOL Corporate Counsel Bruce Stanton would be available to assist in developing a workable RSO. He is an expert in developing RSO's in California, tailored to individual cities and counties.

I would like to continue to be involved in the study and development of this particular RSO. It is unfortunate that the earlier RSO was not amended in 1995 rather than becoming obsolete. Many things have changed since it was first developed, and now is the perfect opportunity to write an entirely new RSO that reflects the current status and conditions of the mobile home parks in the unincorporated areas of Los Angeles County.

Coincidentally, I have been working with Bruce for some time regarding a proposed request to the LA County Board of Supervisors to develop a new RSO for LA County. I was so excited about your proposal that I emailed Bruce immediately. I had just been speaking with him about it at the Senator Connie Leyva's Town Hall Meeting in Fontana on October 11th.

Another person that Bruce works with is Dr. Kenneth Baar, <u>the most noted expert</u> on Rent Stabilization Ordinances and other mobile home park issues in California and other states.

Bruce Stanton said to contact him, and he will assist you with getting in contact with Dr. Baar.

Here is the contact information for Bruce Stanton, Esq.:

Law Offices of Bruce E. Stanton
6940 Santa Teresa Blvd., Suite 3
San Jose, CA 95119
(408) 224-4000
(408) 224-4022 FAX
brucestantonlaw@yahoo.com

Thank you again for this opportunity to save the homes and lives of so many vulnerable people. We appreciate your compassion and forethought. These are seniors, veterans, disabled and other low and very-low income homeowners who have spent their live-savings on their homes. If rents are allowed to go beyond their incomes, they will become homeless. We do not need more additions to our homeless population. I have too many examples of horror stories of elderly people losing their homes and being forced out to live either on the streets or in their cars (if they are fortunate enough to have one).

Respectfully,

Mary Jo Baretich
GSMOL Region 5 Manager
Past GSMOL State President
21752 Pacific Coast Hwy Sp. 23A
Huntington Beach, CA 92646
(714) 960-9507
mjbaretich@hotmail.com

From:	Donalea Bauer
To:	Connie Chung
Cc:	Donalea Bauer; Cassie Dyer
Subject:	board of supervisors rent control proposal for mobile home parks
Date:	Monday, November 13, 2017 5:29:55 PM
Attachments:	image003.png image007.png image009.png image010.png image012.png

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We have been advised through Western Manufactured Home Association that there is a proposal for rent control in mobile home parks.

We manage community associations that are mobile home/manufactured home communities that are owned by each individual owner (not by one park owner). We want to ensure that the verbiage for any of these proposals is not impacting resident owned communities as we don't rent the units. The park owner has no rental authority in this case – it is each individual lot/mobile home owner.

Please feel free to contact me if you need additional clarification. Thank you!

We are excited for our new domain. "mylordon.com". We are making some changes trying to make it easier for our clients. Therefore, please change my email address in your contacts to donalea@mylordon.com

Thank you!

Donalea Bauer
Vice President
Ext. 3342
WWW. MYLORDON.COM

P: (626) 967-7921 Corporate Office
F: (626) 966-3918
1275 Center Court Drive
Covina, CA 91724

If you are happy with my service, please **let us know**. We would appreciate your feedback. Please **click here** to complete our brief customer care questionnaire.

ATTENTION ALL VENDORS: Please submit your invoices by mail as soon as work is completed. Please write the name of the association on the envelope, attention to accounting. The work order number that Lordon Management issued you must be on the invoice. If you do not have a work order number, please contact me as soon as possible. Thank you for your cooperation in assuring that you are paid in a timely manner.

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Los Angeles County Business Federation

Strengthening the Voice of Business

BizFed's Member Alliance
AIA Los Angeles
Alhambra Chamber
American Beverage Association
Antelope Valley Board of Trade
Apartment Association, California Southern Cities
Apartment Association of Greater Los Angeles
Arcadia Association of Realtors
Asian American Business Women Association
Asian American Economic Development Enterprise
Asian Business Association
Association of Independent Commercial Producers
Azusa Chamber
Bell Gardens Chamber
Beverly Hills Chamber
Beverly Hills / Greater LA Association of Realtors
Burbank Association of Realtors
Building Industry Association, LA / Ventura Counties
Building Owners & Managers Association, Greater LA
Business & Industry Council for Emergency Planning & Preparedness
CalAsian Chamber
California Apartment Association, Los Angeles
California Business Roundtable
California Cannabis Industry Association
California Construction Industry and Materials Association
California Contract Cities Association
California Consumer Finance Association
California Fashion Association
California Grocers Association
California Hotel & Lodging Association
California Independent Oil Marketers
California Independent Petroleum Association
California Life Sciences Association
California Metals Coalition
California Restaurant Association
California Small Business Alliance
California Trucking Association
CALInnovates
Carson Dominguez Employers Alliance
Central City Association
Cerritos Chamber
Citrus Valley Association of Realtors
Construction Industry Air and Water Quality Coalitions
Consumer Healthcare Products Association
Council on Trade and Investment for Filipino Americans
Culver City Chamber
Downey Association of Realtors
Downtown Long Beach Alliance
El Monte/South El Monte Chamber
Employers Group
Engineering Contractor's Association
Entrepreneurs Organization, Los Angeles
F.A.S.T.-Fixing Angelenos Stuck In Traffic
FilmLA
Foreign Trade Association
FuturePorts
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Greater Lakewood Chamber
Greater Los Angeles African American Chamber
Greater Los Angeles New Car Dealers Association
Harbor Association of Industry and Commerce
Harbor Trucking Association
Hollywood Chamber
Hospital Association of Southern California
Hotel Association of Los Angeles
Industry Manufacturers Council
International Warehouse Logistics Association
Inglewood Airport Area Chamber
Investing in Place
Irwindale Chamber
Japan Business Association of Southern California
La Canada Flintridge Chamber
LAX Coastal Area Chamber
Leadership for Urban Renewal Network
League of California Cities
Local Search Association
Long Beach Area Chamber
Los Angeles Area Chamber
Los Angeles Black MBA Association
Los Angeles Cleantech Incubator
Los Angeles County Bicycle Coalition
Los Angeles County Consumer Affairs
Los Angeles County Waste Management Association
Los Angeles Gateway Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles Metropolitan Hispanic Chamber
Los Angeles Parking Association
Los Angeles Urban League
Pacific Palisades Chamber
Pasadena Chamber
Pomona Chamber
Maple Business Council
Motion Picture Association of America
MoveLA
NAIOP Southern California Chapter
National Alliance for Jobs and Innovation
National Association of Women Business Owners, LA
Pacific Merchant Shipping Association
Pasadena-Foothills Association of Realtors
Planned Parenthood Souther California Affiliates
Recording Industry Association of America
Regional Black - San Fernando Valley Chamber
Regional Hispanic Chamber
Regional San Gabriel Valley Chamber
Rosemead Chamber
Rotary Club of Los Angeles
San Gabriel Chamber
San Gabriel Valley Civic Alliance
San Gabriel Valley Economic Partnership
Santa Clarita Valley Economic Development Corp.
San Pedro Peninsula Chamber
Santa Monica Chamber
Santa Monica Junior Chamber
Small Business Action Committee
Society of Hispanic Professional Engineers - Los Angeles
South Asian Business Alliance Network
South Bay Association of Chambers
South Bay Association of Realtors
Southern California Golf Association
Southern California Grantmakers
Southern California Minority Supplier Development Council Inc.
Southern California Water Committee
Southland Regional Association of Realtors
Toluca Lake Chamber
Torrance Area Chamber
Town Hall Los Angeles
Tri-Counties Association of Realtors
United Chambers San Fernando Valley
United States-Mexico Chamber
Valley Economic Alliance
Valley Industry & Commerce Association
Vernon Chamber
Vietnamese American Chamber
West Hollywood Chamber
West Los Angeles Chamber
West San Gabriel Valley Association
Western Manufactured Housing Association
Westside Council of Chambers
Western States Petroleum Association
West Valley/Warner Center Chamber
Westwood Village Improvement Association
Wilmington Chamber
Young Professionals in Energy - LA Chapter
Youth Business Alliance
Warner Center Association

October 17, 2017

Honorable Supervisor Kuehl
Kenneth Hahn Hall of Administration
500 W. Temple Street, Room 821
Los Angeles, CA 90012

Re: Mobile Home Rent Control ordinance. (EXPAND THE SCOPE)

To the Honorable Supervisor Sheila Kuehl,

We're writing to offer our help and to serve as a resource to you regarding the housing market in LA County. As you know, housing is a huge concern for BizFed and the 325,000 employers we represent. Our region's housing crises and lack of housing stock at all levels affects all their 3 million employees. Since our members are stakeholders in any housing related policies, many of them have indicated interest in what information will be studied for this Board requested analysis. BizFed requests the scope of the study be expanded to include answers to the following questions with comprehensive analysis on the impacts of this Mobile Home Rent Control Ordinance when an update is reported back to you.

<u>The economic impact of Mobile Home Rent Control</u>

1) How does the cost of mobile home living compare to traditional housing in LA County? Is it more or less expensive?
2) What impact will rent control have on increasing the stock of affordable housing and how will it help the County reach its housing goal (most agencies set such goals)?
3) Will rent control stimulate new mobile home park development or expansions?
4) In order to benefit those truly in need, should means testing be applied?
5) If one's home is paid off, should rent control be applied?
6) What, if any, would be the projected deterioration of mobile home housing stock?
7) What number of tenants are being pushed out of mobile home housing because of increased market forces? What regions have been most impacted?
8) What are the impacts of general impact fees, special district fees, zoning, materials, labor, soft costs/permitting & carrying costs and its relation to increasing the cost of building more housing units (both traditional housing and mobile homes) to help alleviate market burdens?

We believe this provides a well-rounded and thoughtful balance that is needed to have a comprehensive conversation on the factors that cause the housing crisis, and to figure out and execute real solutions to solving it such as promoting and incentivizing more housing units; and not policies that can have the unintended consequence of creating additional scarcity that drives up the cost of housing.

6055 E. Washington Blvd., #260 Commerce, California 90040 T: 323.889.4348 F: 213.652.1802 www.bizfed.org

Thank you for considering our thoughts on the economic impacts of this Mobile Home Rent Control ordinance. Please consider BizFed - and the over 160 business associations that we represent – as a resource as you develop your analysis. We look forward to continuing this dialogue as part of the stakeholder process and we look forward to digesting your findings.

Sincerely,

Mike Lewis
BizFed Chair
Senior VP,
Construction Industry
Air Quality Coalition

David Fleming
BizFed Founding Chair

Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.

11/9/17

Thank you for your request for comment regarding the LA County Board of Supervisor's study into a new manufactured home community rent stabilization ordinance.

MHAction is very supportive of this effort, and applauds the Board of Supervisors for their understanding of the need to preserve affordable housing, and of the important role of mh communities in this sector.

In our work with residents of manufactured home communities across the country we've heard countless stories of low-income families and seniors forced out of their homes by rapidly escalating rents. We have also witnessed increasing consolidation of community ownership, resulting in large corporate conglomerates too distant from the residents to respond to community needs. In the past, it was possible for residents of manufactured home communities to approach a local owner and negotiate if an emergency or job loss made them late on rent. Now, we hear stories of seniors receiving eviction notices during hospital stays, and finding themselves with no recourse.

In our work with homeowners living under lot rent stabilization in California and other states we have seen that even with an ordinance, residents may still face unexpected and unreasonable lot rent increases**.** Considering this, we urge you to pay particular attention during your consideration of the adoption of a manufactured-home rent stabilization ordinance to the following items:

- Restrictions to prevent capital improvement and capital replacement costs being passed through to residents without prior approval from the majority of residents.
- Restrictions to prevent the closure and re-development of mh communities without appropriate compensation to residents and homeowners.
- Consultation with outside experts in the manufactured-home rent stabilization ordinance field, both during your investigation of the feasibility of an ordinance and before the actual writing of the ordinance. This will insure your ordinance is robust enough to protect home owners, and will protect your County from legal challenges.

Now, more than ever, residents of manufactured home communities are forced to rely on their local governments to protect them from profit-driven landlords. We commend your acknowledgement of the importance of stabilizing rents in these communities and for your efforts to preserve affordable housing in Los Angeles County.

Thank you for considering our input.

Sincerely,

MHAction Staff and Core Team Leaders

WOODLAND PARK MOBILE ESTATES

4201 Topanga Canyon Blvd, Woodland Hills, CA | 818-348-5920 |

11/14/17

Ms Connie Chung, AICP
Supervising Regional Planner
General Plan Development and Housing
Section Los Angeles County Dept. of Reg. Planning
320 W. Temple Street, 13 floor
Los Angeles, CA 90012

RE: Woodland Park Mobile Estates (WPME) Business Model for Los Angeles

Dear Ms Connie Chung, AICP:

Thank you for taking the time to read our letter and hear the heart of our UNUSUAL Mobile Home Park Business Model. Our family has owned and operated Woodland Park for the last 45 years. We have run WPME with the idea that we provide high quality facilities and amenities while maintaining a rent structure that is lower than other real-estate properties in the area. Our residents are charged a fair price for the service and great product they receive. It's really that simple.

We have increased the residents rents a modest 2.5-3% for the past 20 years while other expenses have risen at a far greater rate. In some years when the real-estate market went south, we even froze our rents for years and in some cases lowered the rents.

Of course, there are so many other factors that influence housing costs. Overall housing prices throughout the spectrum of home types and certainly area wages and general economy factors are much more influential than one isolated subject of rent. Costs of all kinds that are outside the control of any parkowner influence homeowners cost of living as well as park's operational expenses. Utilities, communications, rubbish removal, transportation and fuel costs, food, medical expenses, recreation, technology, taxes, education, etc. etc. Attempting to control only one sliver of the economy is not an answer to affordability.

Additionally, while the concept of rent control is to control the affordability for park residents, numerous examples show that without control over home prices within these parks, it does

NOT result in making mobilehome park living any more affordable. Parks that have become rent control regulated have homes being sold at prices far above the same home in non rent controlled similar parks. So the net result to those moving into these parks is often an increase in their housing cost and not less. At the same time the parkowner's income is reduced, which reduces their ability to afford upgrades to the park which would otherwise be done to enhance the quality of life within the park. In the long run, residents eventually lose the quality of life they have now without realizing a financial benefit.

I hope you are not going to punish a park that has served the area with fair prices over the last 45 years with no end benefit to the park residents.

Sincerely,

David Delaplane
Woodland Park Mobile Estates

From: Dan Fischer
To: Connie Chung
Subject: Los Angeles County Rent Control
Date: Wednesday, November 15, 2017 11:59:39 AM

Ms. Connie Chung, AICP
Supervising Regional Planner
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Ms. Chung -

My name is Dan Fischer. My wife Lauren and I own a mobile home park in unincorporated Los Angeles County called Golden State Mobile Lodge in Torrance. We have owned this property since 2008 and plan to own this property until we pass away and leave it to our daughter Grace. We are heart-centered, fair and compassionate owners who own and manage our community with our residents in mind. We treat our residents the way we would like to be treated. Part of our belief in providing valuable services to our residents includes maintaining an affordable living environment. In that spirit, we offer all of our residents long-term leases with annual increases based on CPI. In addition, we offer a rental assistance program whereby we provide a rent discount to any resident who qualifies. Note that this money comes out of our own pockets.

We actively operate our community with extensive maintenance programs to proactively address health and safety issues as well as manage our community in a manner that provides the residents with security. If Los Angeles County creates rent control for mobile home parks, the ability to proactively manage our community will be hampered. Time and again, we have seen communities spiral downhill once rent control is implemented as the community owner simply cannot afford to maintain the property as the residents are accustomed.

In addition, rent control doesn't actually lead to more affordable housing. It simply creates large entry costs for homebuyers as home prices increase unnaturally due to the below market rent. A case in point is Malibu where the mobile homes sell for a million dollars or more

because the rent is artificially low. Who can argue that is affordable housing?

Finally, rent control is a burden on taxpayers as Los Angeles County will be required to implement a program which requires staff, office space, etc, and defend the county from inevitable lawsuits that will result. Many communities throughout California are rejecting rent control for this reason alone.

There are myriad more reasons that rent control doesn't work and I am sure that you are aware of these arguments. I hope that these arguments are taken into consideration so that the supervisors can do what is right and what makes sense for Los Angeles County and its residents rather than what is simply politically expedient for themselves.

Respectfully,

Dan Fischer
Fischer Investment Group
14751 Plaza Dr., Suite H
Tustin, CA 92780
(949) 654-8810
dan@fischerfoundation.com

Western
Manufactured Housing Communities
Association

November 10, 2017

Connie Chung, AICP
Supervising Regional Planner, General Plan Development and Housing Section
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor | Los Angeles, CA 90012

Dear Ms. Chung,

The Western Manufactured Housing Communities Association (WMA) is one of the oldest, largest and most respected non-profit trade associations of its kind in the United States. We represent the owners and operators of mobilehome communities throughout the state of California.

Thank you for allowing WMA and our members the opportunity to provide your department with commentary and information regarding the mobilehome park rent control feasibility report — which the Board of Supervisors requested last month.

For decades, scores of individuals and families from all walks of life have found homes they can afford in mobilehome parks throughout Los Angeles County. Our members are responsible and compassionate housing providers, who have a long tradition of maintaining rents that are fair and reasonable.

Below please find a *Mobilehome Park Rent Control Fact Sheet*. WMA and its members look forward to actively participating in this discussion.

Sincerely,

Jarryd Gonzales

Western Manufactured Housing Communities Association

310 Ultimo Ave.

Long Beach, CA 90814

Email: jarryd@good-strategies.com

Phone: 855-338-1987

MOBILEHOME PARK RENT CONTROL FACT SHEET

Mobilehome park rent control is **NOT** common in California:

- Of the 540 incorporated cities and counties in the state, only 95 jurisdictions have placed their mobilehome parks under some form of rent control; the rest — 445 — are strictly regulated by state law, and month-to-month or long-term lease agreements.

- *Only 11 of California's 58 counties have mobilehome park rent control ordinances in* place today.

- Over the past ten years, 18 local government jurisdictions — Ceres, Citrus Heights, Corona, Encinitas, Galt, Huntington Beach, Lake County, Lakeport, Lathrop, Mendocino County, Nevada County, Perris, San Jacinto, Stanislaus County, Turlock, West Sacramento, Yolo County and Yuba County — officially considered mobilehome park rent control and then rejected it; all these cities and counties remain free of rent control to this very day.

All mobilehome park residents are rigorously PROTECTED by state law:

- The rights and obligations of mobilehome parkowners, residents and management are contained in the Mobilehome Residency Law (MRL) and codified in Chapter 2.5 of the California Civil Code.

- *The MRL affords ALL mobilehome park residents the strongest "just cause" eviction* protections in the state.

Rent control in unincorporated Los Angeles County would be **LIMITED** in scope:

- Despite reports that there are more than 100 mobilehome parks in unincorporated Los Angeles County, there are only 30.

- And many of these mobilehome park residents have voluntarily signed multi-year, long-term lease agreements, which are by state law exempt from any and all forms of rent control.

- Rent control ordinances cannot address common landlord-tenant issues — like management complaints, neighbor-to-neighbor disputes and communications — most of which are already subject to state law.

Rent control does **NOT** preserve affordable housing:

- Rent control dramatically diminishes affordable housing stocks because it only regulates rent increases on the space; it does not limit the resale price of the mobilehome.

- If unincorporated Los Angeles County were to enact rent control, current mobilehome park residents would likely see their mobilehome values skyrocket — thus reaping a huge windfall — as prospective home buyers will pay a premium price for a mobilehome that is located in a rent controlled community.

- Los Angeles County parkowners have and continue to provide some of the most affordable housing in the region — not because they were forced to by the rent control — but because their business models, their hard work in building and maintaining their parks and their compassion for their residents enabled them (often for generations) to survive and prosper in a rental market that fluctuates unpredictably.

- What happens to mobilehome park residents — especially low-income individuals, families and seniors — if rent control forces parks to close or to convert to other uses?

Rent control is a **BURDEN** on taxpayers:

- *A Daily Breeze headline (5/5/2016): "Jury rules city of Carson violated mobilehome parkowner's* constitutional rights, owes $3.3 million; a federal court jury on Thursday ordered the city of Carson to pay $3.3 million in damages to a mobilehome parkowner for violating his constitutional rights when it repeatedly rejected proposed rent increases *at his park."* The current amount the city of Carson owes the mobilehome parkowner is **$8 million.**

- Over the years, rent control jurisdictions in California have spent tens of millions of taxpayer dollars administering their rent control ordinances and defending them in court.

- *A Santa Cruz Sentinel article (10/14/2011): Voting to repeal Capitola's mobilehome* park rent con*trol ordinance, Councilmember Sam Storey stated, "I'd like to point out* that the council and staff have an obligation to the entire city and have to lookout for the well-being of the entire city. When faced with a half-million dollars in legal expenses yea*r after year, you are forced to look for solutions."*

Rent control is **NOT** means-tested:

- Unlike virtually all federal, state and local government housing programs, rent control ordinances contain no provisions for means-testing and/or income qualification.

- Under rent control, an affluent mobilehome park resident in Malibu receives the very same financial benefits as a single mom working a minimum wage job and living in a mobilehome community in Sylmar — *that's not fair.*

- Not all mobilehome park residents are in need of government-mandated rental assistance.

Long-term lease agreements are **BETTER** than rent control:

- Long-term lease agreements are legally binding contracts and are fully enforceable in a court of law; terms of a long-term lease may not be changed without both the parkowner and the resident voluntarily agreeing to the changes.

- Long-*term leases (which can be flexible and tailored to an individual residents' needs:* 3 years, 5 years, 10 years, or 20 years, etc.) offer future rent increase predictability and security at zero cost to residents and taxpayers; and they can be made assumable.

- Almost all rent control jurisdictions require residents to pay a monthly rent control administration fee; this fee is an additional monthly rent increase for residents that often increases annually and never comes close to covering the full costs associated with rent control.

Rent control **HARMS** the quality, condition and harmony of mobilehome community life:

- A well-maintained mobilehome park heightens the quality of life for its residents; increases their home values; and protects the surrounding neighborhood from blight and crime.

- Rent control slashes parkowner revenues and limits flexibility; subjects them to resident approval of capital improvement projects; and discourages community reinvestment and heightened maintenance.

Rent control sows discord among parkowners, residents and management that often leads to unnecessary disputes, additional government expense and costly lawsuits.

KEITH MANAGEMENT
2320 W Ray Rd., Ste 3 Chandler, AZ 85224
P 480-963-2584 ~ F 480-963-2712

November 6, 2017

Hon. Mark Ridley-Thomas, Chairman 2nd District Supervisor
Hon. Hilda Solis, 1st District Supervisor
Hon. Sheila Kuehl, Chair Pro Tem, 3rd District Supervisor
Hon. Janice Hahn, 4th District Supervisor
Hon. Kathryn Barger, 5th District Supervisor

Dear Members of the Los Angeles County Board of Supervisors,

I would like to take a moment to express my concerns regarding the matter of proposed rent control in the unincorporated areas of Los Angeles County. My family purchased a Manufactured Home Community a few years ago located in Lancaster which happens to be located in an unincorporated area of Los Angeles County. It is a 5 Star, 55+ Gated Community with a large lake, clubhouse, swimming pool and multiple other amenities. Space rent is currently about 1/3 of what it would be 20 miles south of this location. In the past 24 months we have invested in new roads, remodeling the clubhouse and other various projects for improve the quality of life for the tenants. I have major concerns regarding the proposed rent control based on past experiences in such instances.

My initial fear is that by establishing rent control, it will make home prices in our park inflate to the point they will no longer be affordable to future generations of senior citizens. I am a third-generation park owner having owned and operated approximately 35 parks in 5 different states. Experience has shown me that when rent control comes into play, a double wide home that is currently selling for $70,000 to $90,000 will spike up to at least $250,000. Instead of the tenants being able to purchase the home outright, they would be forced to obtain financing at an average interest rate of 8%. Therefore, rather than paying cash for their home and paying average space rent of $500.00 to $600.00 they will have a mortgage payment up to $1,600 per month in addition to their space rent. Ultimately, rent control would have the opposite effect and greatly increase the monthly cost to live in the park rather than achieve the desired result of "controlling" future costs and the impact would be immediate.

In addition, both the previous owner and I have been very fair in assessing rent increases on an annual basis. When I purchased the property it was re-assessed and the property tax spiked up to $140,000 which reflects an increase of $80,000 per year. My family was forced to invest a large amount of capital to cover this additional cost. Our plan was to recover and offset these additional costs by increasing rent fairly on an annual basis. Should rent control be implemented, we would no longer be able to make a fair return on investment thus keeping us from being able to invest any future capital into the property.

My final concern is that with interest rates on the rise, it will be virtually impossible to obtain new financing on the property. Had rent control been a consideration when purchasing the property, the purchase price would have reflected such. Should the county decide to implement rent control, our inability to raise rent according to rising costs associated with operating the property and our inability to obtain new financing would be financially devastating to our family-owned small business.

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Thank you for allowing me the opportunity to share my concerns. I can be reached at 818-632-8048 if you would care to discuss this matter further.

Sincerely,

Charles Keith
Clan Keith Real Estate Investments LLC, Managing Member

Cc: Connie Chung (Office of Planning)

To: Honorable Supervisor Hahn, Supervisor Kuel, and the Board of Supervisors

From: Manyin Li, A resident in Rowland Heights Mobile Estate Park

Re: The Proposed RSO

Date: November 13, 2017

Dear Supervisors:

The 1987 RSO states: *"a **virtual monopoly exists** in the rental of mobilehome park spaces, creating a situation where **park owners have unbridled discretion and ability to exploit** mobilehome park tenants ."*

I, as a mobilehome park resident, am presenting facts to show that the above statement is still true now as it was in 1987, when the RSO was created, and in 1995, when the RSO was terminated.

The facts are presented in the following 4 aspects: I. **The unbridled increase of rent; II. the unilateral space lease agreements that were forced on tenants; III. unjust practices in the RHME Park; IV. bullying and overlord-like Practice in dealing with non-English speaking tenants; V. violations of Mobilehome Residency Law.**

I. THE UNBRIDLED INCREASE OF RENT

A. An Example of How Rent Has Been Increased Yearly

I, Manyin Li, bought the mobilehome already sitting on Space 61 in June of 2004, and my husband and I have lived here for the last 13 years. The following table shows how the rent has been increased in13 years:

Year (July to July)	Rent	The Amount of Rent Increase	Rate of Increase	Note
2004-2005	$628.08			
2005-2006	$651.95	$23.87	**3.80%**	
2006-2007	$685.20	$33.25	**5.10%**	
2007-2008	$709.18	$23.98	**3.50%**	

2008(July)-2009(Mar) 2009 (Apr-July)	$713.16 $731.16	$3.98 $18.00	**0.56%** **2.52.%**	
2009(July) –2010 (July)	$753.09	$21.93	**3.00%**	
2010-2011	$775.68	$22.59	**3.00%**	
2011-2012	$798.95	$23.27	**3.00%**	
2012-2013	$822.92	$23.97	**3.00%**	
2013-2014	$847.61	$24.69	**3.00%**	
2014-2015			**0%**	**This is a result of the protest and demand of residents organized under the name of "1441 Mobilehome Residents Association. "**
2015-2016	$864.56	$16.95	**2.0%**	**A 15 year new lease was signed**
2016-2017	$889.63	$25.07	**2.9%**	
2017 (July) to Present	$915.43	$25.80	**2.9%**	
Total Increase in 13 years		**$287.35**	**Total Increase Rate: 46%** **Average Yearly Increase Rate 3.54 %**	

Note: 1. $ 628 is 36% of my househood Gross Income, $1738, back in 2004 and affordable, but $915 is 47% of my household Gross Income, $1927, in 2017 and unaffordable. If calculated after Medicare Premium is deducted, the percentage is > 53%. When repair fees and property tax of the mobilehome are included, the expenditure on housing has reached 60% of our income.

2. The above table shows REGULAR rent increase. Those who bought their mobilehomes in the last 10 years suffer from one time increase 12% and more in addition. (See C below)

B. **The Status of Current Rent Rates in RHME Park**: The highest rent right now is more than $1200; the middle range of rent is between $900-$1100; the lowest rent is between $750-$800. Why such big difference for the same size of space? It depends on when the tenant moved into the Park. The tenants who moved-in in recent years pay the highest rent, and the few old residents who have lived in the Park more than 20 years enjoy the lowest rate, even though their rents also increased yearly.

C. **An Abnormal Practice Contributing to the Excessive Increase of Rent**

The key is whether the same space has been rented by different tenants over time. If a tenant rented the space 20 years ago and never sold the mobilehome and still lives at the same space, the rent increase does not seem excessive due to the low base rent. Those spaces on which the mobilehomes have been changed hands more than once got the highest rent increase because every time when a new mobilehome owner signed a new lease agreement, the rent increase rate is 12%. In certain cases, the increase rate is as high as 15%, which is beyond the percentage allowed by the Mobilehome Residency Law. Before the early 2000s, a new mobilehome owner paid only $20 more than the rent paid by the previous homeowner who sold the mobilehome to him/her. Later, the increase changed to $50. The biggest change came after about 2006 or 2007. Before then, most residents in RHME Park were English speakers. Most of them sold their mobilehomes in the years between 2006-2008 when the value of mobilehomes rose to the highest point. As a result, most residents became Chinese speakers. This change gave the Park a perfect opportunity to raise the rent. Instead of paying $50 more than the previous mobilehome owner, the new mobilehome owners have to pay 12% more, and the Park was thus able to raise the rents of most spaces to $1100- $1200. (I tried to find out the legal ground for the 12% increase but have not found the source.)

D. Excessive High Rent Decreases Mobilehome Value

High rent not only makes lives of Mobilehome owners harder but has a direct negative impact on the value of their mobilehomes in case they need to sell their mobilehomes in order to move out of the Park.

Proposal of Remedy:

There are different ways to control the rent in mobilehome parks.

To set a cap on how much, or what percentage, the park owners can raise the rent each year based on current rent rates certainly will not help residents, because the

current rates are unreasonably too high, higher than the current rent in the neighboring mobilehome park in Rowland Heights at Oterbien Street, much higher than the current rent in mobilehome parks under rent control, such as in Carson City, which is less than $500, and much higher than the lowest rent in RHME Park. If the County is to set a cap on how much, or what percentage, the park owners can increase each year, the County should consider this: the 1987 RSO went in effect on January 1, 1988, and the base rent was the rent on December 31, 1984.

A just and fair RSO must include the following two factors:

The first thing to determine for a better way to control the rent is setting a reasonable base rent. As the current rent already under RSO is $450-$500 and the lowest rent in the RHME Park is $750, the median amount of $600 as the base rent is reasonable, affordable, and still allowing the park owners to have reasonable profit.

The second thing is to determine the maximum amount or percentage allowed for the park owner to increase on yearly basis. However, this increase should not be automatic. The 1987 RSO and the current practice of cities in LA County with RSO require the landowners to apply for rent increase on yearly basis. A rent adjustment commission should be set up with the authority to approve, partly approve, or deny the application of rent increase with good reasons.

II THE UNILATERAL SPACE LEASE AGREEMENTS that WERE FORCED on MOBILEHOME OWNERS/TENTANTS

A The Park Mangement Usually does Not Offer New Tenants Choices of Different Terms of Leases

Civil Code 798.18（a）provides that a tenant of a mobile home park has the right to choose (1) a 12 month lease agreement, (2) a short term, less than 12 months lease agreemt, or (3) a long term, more than 12 months, lease agreement. However, this park never even notified the tenants of this right. English speaking mobilehome owners know the three choices perhaps for two reasons: 1 they can read the Mobilehome Residency Law, or 2 they were notified by the management.

In the last few years, the 3 options have been gradually known to non-white homeowners, but they are afraid to pay very high rent if they choose to sign short term leases, as the management told them the Park had the discretion to raise rent anytime per month if they sign a lease agreement less than 12 months even though Code 798.18(b) provides: *"No agreement shall contain any terms or conditions with respect to charges for rent, utilities, or incidental reasonable service charges that would be different during the first 12 months of the rental agreement from the corresponding terms or conditions that would be offered to the homeowners* on a month-to-month basis."

B A Deceptive Long Term Lease Agreement of 15 Years Forced upon Most Mobilehome Owenrs/Tenants in 2014

When we moved in, the management simply offered us a 5 year lease agreement. In that agreement, it is provided that the annual rent increase is 3% or the CPI, whichever is greater. In January of 2014, the newly founded Residents Association had its first and only meeting with the Park owners. Due to the pressure of residents' overwhelming protest and demand at that meeting, the Park was forced to announce that there would be no rent increase for 2014. Shortly after, in April, however, the Park proposed to mobilehome owners whose leases were going to expire soon to sign a 15 year long term lease. The Park actually offered 3 options. For the 15 year lease, the annual lease increase rate is 2.9% or CPI, whichever is greater; for the 10 year lease, it is 3.5% or CPI; for the 5 year lease, it is 4% or CPI. People naturally chose the least evil lease among the three when they had no other choices, as they are powerless and in the mercy of the Park owners. As a result, most mobilehome owners, including new ones, have a 15 year lease now. Only later, do they realize this is a trap. 2.9% looks better than 3%; however, the decrease is only $1 for every thousand dollars. In the 10 year and 5 year leases, the increase is from 3% to 3.5% and 4%, respectively, which means $5 and $10 for every thousand dollars, respectively. On the surface, the Park was encouraging tenants to sign a long term lease with smaller annual rent increase; in fact, the Park is luring tenants to lock in a long term lease so that future RSO will not apply to their cases. By playing this single trick, the Park was able to raise the annual rent increase from 3% or CPI, whichever is greater, to 3.5% and 4% or CPI, This excessive increase is outrageous, exploitive, and without any ground.

C The Majority of Mobilehome Owners in RHME Park with a 15 Year Lease would Not Be Able to benefit from the Proposed RSO

RSO is exempt to long term leases during their terms. As most mobilehome owners in the RHME Park are trapped by the 15 year lease, they have to wait 12 to 15 years in order for RSO to apply to their cases.

Proposal for Remedy: In order for the majority of mobilehome owners with a 15 year lease agreement forced upon them to be protected by the proposed RSO, the County must find a way to address this problem. Otherwise, the proposed RSO would have no meaning to them.

III Unjust Practices in the RHME Park

At one of the BOS Meetings, I spoke of one of the unjust practices in RHME Park. There are more as described below:

A The Park Owners' Unilateral Power in the Writing and Amending the Lease Agreement:

The lease agreement is written by the Park owners in which the tenants have no say. If the Park wants to amend it, they can do so in their discretion and the tenants of the space still have no say. (Item "g" under "Terms of This Agreement" of "the Long Term Lease Agreement" provides: "*This Agreement may be amended by providing the amendment, by statements, billings, and related payments as per the monthly statements, without formal 60, 90, day or other form of written notice. "*

Tenants do not have any right or power to ask for amendment. Usually, a mobilehome owner buys a mobilehome fixed on the space before they sign the lease agreement. As they already invested the money in purchase of the mobilehome, they have to accept whatever is said in the Agreement. Before I signed the lease agreement back in 2004, I did feel it unilateral, unfair, and too strict to tenants, but I had bought the mobilehome, how could I not accept it. I told my husband: "This is a free country, but not here in this Park."

B Item 6.3 in the 5 year lease agreement prohibits mobilehome owners/tenants from revealing current rent to prospective home buyers, so the Park can raise the rent as much as they want to new tenants. As new homeonwers/tenants are deprived of the right to the knowledge of the current rent, they have to accept a much higher rent.

C The Park Owners Made Sure that They Have a Big Profits even though Tenants are Suffering from the Recession. The rent still kept increasing at the rate of 3% every year during the Recession from 2008 on, regardless of the CPI being a negative number, because it was imposed on tenants by the Lease Agreement, which provided that the increase rate was either 3% or the CPI, whichever is greater.

D Cancellation of Services without Explanation while Increasing the Rent:

The services in the Park are part of what the tenants pay for. The Park has no right to cancel or change services without good reason while increasing the rent. Old tenants told us that there used to be more services than now even though we pay

higher and higher rent than before. One example is the cancelation of the changing room for the swimming pool. As a result, people are in swimming suits while walking from home to the swimming pool and from swimming pool back home. This is not a pretty scene. More serious consequences are some people getting cold or suffering from other symptoms due to wearing wet swimming suits and walking a long way. One woman had a stroke in her face so she moved out. The Park argues that some people misused the changing room for taking baths or washing clothes. If that is true, the management should have held a meeting to discuss this problem with residents, instead of closing down the changing room. If the Park wants to increase the rent, it should resume the services.

IV Bullying and Overlord-Like Practices toward non-English Speaking Residents

Not only does the Park have monopolistic power in creating an overlord lease agreement, but the management also behaves like overlord in dealing with non-English speakers. Due to residents' overwhelming protest against the previous managers at the January of 2014 meeting, the Park Owner had to change the whole management. However, some Park employees still treat non-English speaking residents rudely, without respect or courtesy, even bullying them. They do not think that residents are customers paying for their services; instead, they think that they are superior to residents. Personally I have never been treated that way because I speak English, but other residents who do not speak English are not that lucky.

As nearly 80% residents are Chinese speakers now, residents have requested, for many times, the Park Owner to hire an employee speaking Chinese for better communication. The requests were repeatedly denied by the Park Owner. After Supervisor Hahn came to have meeting in the Park on Oct 11 this fall, the Parker Owner has no good reason to deny it anymore, so now the Park offers 2 hours of free translation service per week. Residents have long held the opinion that the Park does not want to help the residents to break the language barrier so that the Park can keep the Chinese-speaking-only residents in ignorance and make the Park easier to punish them for violations.

If the County is going to hold a resident meeting and let them speak freely how the Park employees have mistreated them, the meeting may last a whole day.

V RHME Park's Violations of MRL and Lease Agreement

A Violation of MRL 798.18 which provides: "*Length of Agreement; Comparable Monthly Terms" (a) A homeowner shall be offered a rental agreement for (1) a term of as months, or (s) a lesser period as the homeowner may request, or (3) alonger period as mutually agreed upon by both the homeowner and management. "* (See II A above)

B Violation of MRL 798.27 "Notice of Zoning or Use Permit and Duration of Lease" which provides: "(*a) The management shall give written notice to all homeowners and prospective homeowners concerning the following matters: (1) The nature of the zoning or use permit under which the mobilehome park operates. If the mobilhome park is operating pursuant to a permit subject to a renewal or expiration date, the relevant information and dates shall be included in the notice."*

The old lease I signed in 2004 contained such information, but the new 15 year lease does not, and there is no other such notice given to homeowners.

The Park seemed to alter/amend the 5 year lease frequently in their discretion, so leases signed in different years have different contents. In the 5 year lease agreement I signed in 2004, it is stated that the CUP expired in 1997, which is true, but in the 5 year lease some tenants signed in 2012, it is stated that the CUP expired in December 31, 2012, which is a lie. I have no idea why the Park gives the false information.

C Violation of MRL 798.25.5 "Void and Unenforceable Rules or Regulations" which provides: "*Any rule or regulation of a mobilehome park that (a) is unilaterally adopted by the management, (b) is implemented without the consent of the homeowners, and (c) by its terms purports to deny homeowners their right to a trial by jury or which would mandate binding arbitration of any dispute between the management and homeowenrs shall be void and unenforceable."*

However, the 15 year lease agreement provides "Alternate Dispute Resolution" requiring homeowner and Owner to "agree to mediate any and all disputes, claims or controversies between them arising from or relating to the enforceability, interpretation, breach or defaut of this Agreement, before resorting to arbitration or court action." This is a violation of MRL 798.25.5.

In fact, the rule or regulation of RHME Park is "*unilaterally adopted by the management,"* and "*is implemented without the consent of the homeowners*." Therefore, they should be void and unenforceable.

D Violation of MRL 798.53 "MANAGEMENT MEETINGS WITH RESIDENTS"

"*The management shall meet and consult with the homeowners, upon written request, within 30 days of the request, either individually, collectively, or with representatives of a group of homeowners who have signed a request to be so represented on the following matters:*

(a) Resident concerns regarding existing park rules that are not subject to Section 798.25.

(b) Standards for maintenance of physical improvements in the park.

(c) Addition, alteration, or deletion of service, equipment, or physical improvements.

(d) Rental agreements offered pursuant to Section 798.17.

Any collective meeting shall be conducted only after notice thereof has been given to all the

requesting homeowners 10 days or more before the meeting. "

However, the management of RHME Park has never held a meeting since the January of 2014 meeting with resident, even though the Residents' Association requested to meet the management and the Park Owner for many times.

Proposal for Remedy

The County should set up a board/office to review the lease agreement to ensure that there is no violation of the law. It should also take residents' complaints and reports and have the authority to conduct investigations so that Park's violations can be found out and corrected in a timely fashion.

Sincerely and respectfully,

Manyin Li

Dear Ms. Connie Chung,

1441 Manufactured Home Residents Association (MRA1441 for short) currently represents a majority of residents in Rowland Heights Mobile Estates Park (RHME for short) located at 1441 Paso Real Ave, Rowland Heights, CA, 91748.

I am grateful that the mobile home RENT issue brought up in the public hearings for the RHME's application of a Conditional Use Permit (CUP) had finally gotten the attention of the County Board of Supervisors; I am grateful for Supervisor Hahn and Kuehl's joint motion to restore the RSO and the Board's unanimous agreement to pass this motion; I am grateful for your hard work to make dream become true.

This means the light of justice finally shines back to the mobilehomes in the unincorporated areas, and the darkness after the sunset of the 1987 RSO recedes at the dawn of the RSO's restoration.

It is a historic victory for the People; it will greatly hinder the possibility for a vulnerable population to become homeless.

The California's Mobilehome Residency Law(MRL)'s main unbalanced point could finally be fixed by an integrated RSO.

The following are my RSO related comments:

I. Some of the Park's monopolistic and retaliatory actions are encouraged by MRL.

On Oct. 23, 2014, a homeowner committed suicide. Later, his friends reported that he received many notices from park's office when he was sick. Some homeowners feel that they live in a jail. One even said he would rather die than live in this park.[1] (Please check media report as footnotes 1.)

This Park's criminal, discriminatory and oppressive actions coupled with elderly abuse crushed many immigrants' American Dream. The Park, driven by discrimination and hatred, forced Mr. Huang to repeat unnecessary home improvements again and again, he was driven crazy, which led to mental distress causing him to be injured in a traffic accident. Facts of the Park's criminal towing, theft of property, violation of privacy, negligence, discrimination, harassment, oppression, perjury and retaliation could be seen in the PowerPoint presentations submitted and presented to regional planning.[2]

A resident that participated in the MRA1441, Bernard, recounts his personal experiences with the park can be read in the first attachment.

The MRA1441 redresses the Park's perjury, and government departments' negligent in the second attachment.

Regarding communication: The CUP hearing officer's suggestion to meet with residents quarterly was ignored by park because of the MRL; the MRA1441 requested the park owners for

[1] LA 18 TV report: https://youtu.be/jYGLhoCfY4s
[2] "Concerns of Residents.pptx" https://goo.gl/NsfY8z

a meeting, but they sent a lawyer instead to seek homeowners' loopholes because the MRL's definition of Management includes any representative.

Because the MRL gives powerful actions of monopoly and retaliation, RHME need not to communicate homeowners, also prohibits the HOA from using the mailing tubes, which the MRA1441 should be able to use to inform homeowners of meetings and activities to benefit the community, RHME's management not only denies that, but also threatens residents, telling them that passing flyers door to door constitutes trespassing, and still, the flyers sent to the residents have been "picked up" by the maintenance crew.

Because of the MRL, Regional Planning decided to ignore the excessive Rent issue in the CUP hearings even though was in the ordinance.

My personal experience discloses that the MRL favors the park owners.

After I moved in to the park in July 2012, I found that the old driveway could not accommodate two cars. I had to move the awning supports as most of other homeowners did in order to widen the driveway. Even though I used standard durable materials, the park manager who disliked me conspired with an official from HCD to disqualify my work. I wrote to the Park and the government office to claim my rights. The park and the official did not respond to my letter, neither did they do anything for over 5 months. In or about April of 2013, after I organized homeowners against the wrongdoings of the Park, the Park picked up the dropped disqualification accusation with many other petty reasons to file an unlawful detainer eviction action against me.

My wife disqualified a judge who denied our request of trial by jury, and a good judge discerned the purpose of the eviction action was retaliatory. Therefore, the Park failed to evict me and my family. However, the Park requested the court to order me to pay lawyer's fee, but the judge denied it. Then the Park appealed. I was ordered to pay part of the Park's lawyer fee. The good judge said: "My hands are tied" due to the bias in the provisions of MRL. This confirmed what a lawyer who works for the county has said: There is no winning to homeowners because the MRL does not stand on the homeowners' side. That is why no lawyers fight for homeowners' rights.

The above mentioned good judge also found evidence of retaliation to other Asian American residents in the park. Among the Hispanic and White homeowners, only Etelvina and Larry are brave enough to speak at the hearings, Etelvina reports that other Hispanic residents do not dare to do so, because they are in fear of the park's abusive treatment, such as Bernard, who was evicted, Yolanda was ordered to paint her home with no other reason other than attending the meetings organized by the MRA1441.

Retaliation is the reason why almost all other mobile home parks are usually deadly quiet. Retaliation takes different forms. Mobile home park owners may order homeowner they do not like to paint their homes and pay for the expensive paint required for the finish, pull off a few weeds in the yard to improve the space, or even threaten eviction with a 7 day notice.

I have visited a few parks, almost all of the people I met think that I must be crazy, daring to stand up against the Park. A very old Caucasian lady looked around to make sure no one saw her receiving my business card and then held the card in her hand tightly.

I realized through the national mobile homeowner's association meeting, this darkness covers Mobile home parks across the nation because of government corruption.

Aside from the Park's criminal actions, homeowner's investments either continually lose value due to the Park's constant increase of rents, or their property gets outright robbed,

1. Unbridled rent increase. The park owners have the absolute power to increase rent at their discretion. Many mobilehome residents who have bought a house in the mobilehome park soon find themselves in dire straits. As the rent gets higher and higher, the value of the mobilehome gets lower and lower. The space rent has an inverse impact on the value of the mobilehome on that space: for every $10 increase in rent, the value of the home drops $1,000. This means when Park owners abuse their power, it is very hard to sell a house due to the high rent especially when residents in RHME Park want to move because of the Park's other abuses. Even if the house is sold, the proceeds may not be enough to cover the original investment in the mobilehome, and most have no other savings to purchase a home elsewhere. For many, this means their only choice is to remain in the Park and stay at the mercy of the Park owners.
2. Fine for "guests" and others. 86 years-old Mrs. Yang was fined more than $4,000 because her nurse lived with her. The management unlawfully locked Mr. Song's home and asked him to pay for the lock and fees that are over $1600.
3. False vacancy control. Our park owners prohibit homeowners from telling potential buyers what the current rent is. This way, the park owner can breach the 12% vacancy control clause (12% is already unreasonably high). Many previous owners who lived in RHME Park paid about $600 for space rent, but the rent got raised to around $900 for the new homeowners, which is about a 50% jump.
4. Unfair rental agreement. Another example of the abuse of power is shown after the establishment of the MRA1441 in our Park, specifically after the MRA1441 met with the Park owners in December of 2013. Shortly after, in early 2014, RHME Park began offering a 15-year lease, which had never been offered previously, with an annual rent increase at 2.9% or CPI, whichever is greater. Compared to the 5 year lease my family signed in 2012 with 3% or CPI, whichever is greater, 2.9% seems a benefit as it is less than the previous rent increase rate, but homeowners are trapped for 15 years. Meanwhile, the Park raised the annual rent increase to 4.0% for the 5 year lease and 3.5% for the 10 year leases. Many residents with expiring lease agreements were forced to sign the 15 year lease because they could not afford the 3.5% and 4.0% annual increases, especially when they were threatened with a 6% increase if they refuse to sign the lease. Since then, new residents also had to choose the 15 year long term lease. Now, it is clear

that the 15 year lease agreement is a trap, because RSO cannot protect residents under any lease.

5. The management has full control over the sale of a home. Park owners like to say in public that residents can move out at any time by selling their houses. Theoretically, it is so, but the management has the power to reject a potential buyer from buying our homes, and the whole process in which how the management approves or denies the purchase of a mobilehome is completely in the dark. This means that if a resident has offended the management or the park owners in any way, they can retaliate by not allowing anyone to buy his/her home, thus, forcing him/her to finally sell it to the Park at a rock bottom price, and the Park can resell it to that same buyer they originally rejected for a huge profit. Furthermore, if the management happens to evict you for any of the 7 reasons listed in the MRL, the mobilehome somehow goes to the park, with no compensation whatsoever. (The park can claim the home as abandoned because it costs too much to move, thus the ownership of the house was transferred.) (See: "MY PERSONAL EXPERIENCE" by previous homeowner who was evicted and became homeless.)
6. Abuse of rules and regulations. Park owners often use their rules and regulations against residents who stand up to challenge their authority and unjust or illegal activities. They often have their attorneys to impose pressure on residents, telling them a) If evicted, he/she will not be able to sell the house and will have to move it out of the Park, which costs between $10,000 and $20,000 and b) the resident will be burdened with the fees for the park's attorney, which can be considerable, as well as fees for his/her own attorney.

II. **Wrongful sunset of the 1987 rent stabilization ordinance**

There has always been a huge socio-economic gap between the park owners and mobilehome residents. Park owners are millionaires who don't have to work and live off the profits gained from the serfs bound to their land. These serfs are the low income families and lower middle classes, and many who live on a fixed income, including veterans, people with disabilities, and most prominently, seniors. Wealth allows the park owners to hire lawyers to take whoever standing against the park owners to the court, where they can get the upper hand over mobilehome owners who have no money or time.

With large assets, park owners have lobbyists to influence lawmakers in Sacramento to write the Mobilehome Residency Law in their favor. Their resources also give park owners an edge at the local level. Park owners can hire attorneys to make frequent contact with local governments as part of their effort to have less restrictions on their business. Park owners claim that the market is enough as a deterrent to keeping the rents at a rate the park owners call "fair" which is not true because they have other advantages than the market.

It must be stressed that park owners do not have absolute interest and power in the park since the houses attached to the land are not owned by them. Therefore, the park owner's' rights and power must be greatly reduced and controlled.

Although it looks like that the park owners have significantly invested in their mobilehome parks. In fact, aside from their inheritance, buying the land, or creating the mobilehome park, the park owners spend no money that does not come from the residents of the park. Due to spending no assets for the mobilehome park operation, the Park gains huge profits for the park owners. On the other hand, mobilehome owners must invest in their homes through property tax, home insurance and all the repairs in homes (compared to apartments, in which the landlords pay for all the repairs, insurance and property taxes), at the same time providing park owners with RENT that is used to pay for taxes, insurance, maintenance fees, legal costs, employees' salaries and all other expenses relating to the operation of the parks as well as profits to the park owners. Therefore, mobilehome owners, who are different from apartment tenants, should have more legitimate rights in the Park than they currently have.

The sunset of the 1987 RSO put a large population of already vulnerable mobile homeowners to be subject to the bullying and extortion of the greedy park owners and encouraged their unbridled abuse of power, even to the extent of criminal actions, for two decades.

It is necessary to investigate the reasons behind the sunset of the 1987 RSO of LA County and persecute the government officials responsible for the sunset.

III How the RSO and County Mobilehome Committee balances the MRL.

The most important principle is that the RSO must be written in line with the American Ideal of equality: putting residents in a fair playing field with the park owners. Homeowners must be encouraged to participate in the County Mobilehome Committee, the writing and passing of the RSO in balancing the power of the MRL of California.

The committee may consist of 5 people appointed by the board of supervisors. There should be 2 government officials, 2 residents, and 1 person who is an official and lives in a mobilehome park as a homeowner. The committee should not include park owners, since park owners are the ones applying to raise rents.

Fortunately, some cities in LA County has stood on to keep RENT stabilization. Carson City's RSO is a great example for our new ordinance, and the city also sets an example as how a committee/board, the work of which is to ensure the enforcement of rent stabilization ordinance, should be organized and operate. Both LA county's 1987 RSO and Carson City's RSO should be taken as models for the initial draft of a new RSO.

A board or committee authorized with the following powers also be created alongside with the RSO:

1. The committee can deny any rent adjustment applications based on a careful audit of the park and the testimony of the residents living in that park before such rent adjustments may take place.
2. Lower the rent where rent is unfairly high.
3. Redress the grievances of the residents by thoroughly investigating their complaints against the park owners and impose appropriate sanctions by adjusting the rent.

4. Revoke unjust agreements.

These many problems have been left to rot for 2 decades. Therefore, this committee should be fully employed until these issues have been resolved.

Ken Meng,
President of 1441 Manufactured Home Residents Association

Gmail

Ken Meng <kenjmeng@gmail.com>

MY PERSONAL EXPERIENCE

Bernard Ekezie <bekezie12@yahoo.com> Wed, Oct 11, 2017 at 10:03 AM
Reply-To: Bernard Ekezie <bekezie12@yahoo.com>
To: Ken Meng <kenjmeng@gmail.com>

TO WHOM IT MAY CONCERN;

I AM ENGR.BERNARD EKEZIE WORKED FOR THE COUNTY OF LOS ANGELES, DEPT OF PUBLIC WORKS, DESIGN DIVISION. I RENTED LAND SPACE 81 OF 1441 S PASO REAL FOR 14YRS. MY RENT SPACE JUMPED FROM $500 TO $900. WHEN I GOT DISABILITY, MY PAYMENT STOPPED AND I GOT BEHIND ON MY RENT, WHEN WE WENT TO COURT HEARING IN JUNE, I HAD $4000.00 WITH ME LEAVING A BALANCE OF $500, THIS MANAGEMENT REFUSED TO ACCEPT IT, BECAUSE OF ITS GREEDY VENGEANCE AND INTENT TO SNATCH A WINDFALL, BECAUSE MY HOME IS NEW AND IS PAID OFF, BUT FOR A PETTY BALANCE OF $1005 JUST INCASE TO HAVE MY BACK FROM MY SELLER. AND THEIR MOST HIDDEN INTENT IS BECAUSE I ASKED FOR A REDUCTION OF SPACE RENT, BECAUSE 12 FEET OF MY FIFTY FEET IS USED AS PUBLIC ACCESS WALK-WAY AND I AM CHARGED RENT FOR IT (12FEET SPACE RENT IS ILLEGAL). WHEN THE SPACE RENT WAS $250, IT WAS SMALL AND NO BIG DEAL, BUT WHEN THE RENTAL SPACE

JUMPS TO $900/MO, THE 12FEET SPACE TAKES AN UGLY BITE (25% OF $900/MO); YOU CANNOT MAKE ANY ADDITION OR ULTERATION OF THE SPACE BECAUSE IT IS NOT MINE AND THEREFORE LEFT ME WITH 48FEET INSTEAD OF 50FEET WHICH EVERYBODY HAS.

WHEN AN OCCUPANT IN THE MOBIL HOME PARK OFFERED TO BUY IT FROM ME FOR AS A GIVE AWAY OF $65,000.00, IN THAT SAME MONTH OF JUNE 2016 THE MANAGEMENT REFUSED ON THE GROUNDS OF FLIMSY EXCUES 'AS THEY BEING THE PAID PIPER WHO DICTATES THE TUNE'. THEY PROCEED TO TAKE MY HOME FOR NOTHING TO DO WHATEVER THEY LIKE ARGUING THAT I ABANDONED AND LOST MY HOME TO JUSTFY THEIR CASE. THE LAND SPACE DOES NOT FORMULATE AND GROW HOUSES!!!

FROM ALL CALCULATIONS, THEY TAKE THEIR $8,000 FOR LAND RENT I OWE (7MO). AND NOW THEY OWE ME $75,000.00 FOR MY HOME, BUT THEY CLAIM THEY ARE NOT OWING ME ANYTHING. BUT FOR INTEREST OF LAW AND EQUITABLE JUSTICE, -COMMON SENSE, I NEED JUSTICE.

I PLANTED THE LUXURIOUS THRE PALM TREE, AND OTHER LANDSCAPE TREES. THEY TOW MY BMW SEVEN SERIES CAR AND USED POLICE TO CHASE ME OUT INTO THE STREET IN COLD AND SEVERE RAIN IN LAST

WINTER. WHERE IS ALL THAT I WORKED FOR AS AN ENGINEER- BRIDGE/HIGHWAY ENGINEER? WHERE IS JUSTICE?????... JUSTICE?????.

.. JUSTICE?????...

Joint Meeting

04/06/2017

LA County Ordinance defines Mobilehome parks in *LA County Ordinance 8.57.010* :

"A. There is presently within the county of Los Angeles a shortage of spaces for the location of mobilehomes. Because of this shortage, there is a low vacancy rate and rents are presently rising rapidly and causing concern among a substantial number of county mobilehome park residents. Because of the high cost of moving mobilehomes; the potential for damage resulting therefrom; the requirements relating to the installation of mobilehomes, including permits, landscaping and site preparation; the lack of alternative homesites for mobilehome residents; and the substantial investment of mobilehome owners in such homes, a virtual monopoly exists in the rental of mobilehome park spaces, creating a situation where park owners have unbridled discretion and ability to exploit mobilehome park tenants.

B. For these reasons, among others, the board of supervisors finds and declares it necessary to protect the owners and occupiers of mobilehomes from unreasonable rent increases, while at the same time recognizing the need of park owners to receive a fair return on their property and rental income sufficient to cover increases in the costs of repairs, maintenance, insurance, employee services, and additional amenities, and other costs of operation."

1) Rowland Heights Mobile Estates (RHME) not only practices a monopoly but also committed at least 10 instances of PERJURY in their CUP hearings.

- RHME deliberately provides document of Chinese residents taking 90-95% of the park; while the actual percent is around 69%, as Chinese are discriminated by many people.
- RHME says that the president of the MRA1441 is not a resident; in fact, he continuously resides in the park since moving in.
- RHME states that retaliation did not exist in the park; a court order declared that it found evidence of retaliation against Asian residents in the eviction case against the president of the MRA1441.
- In the second CUP hearing, RHME claimed that only about 20 households participated in the hearing; residents expressed their concerns in a petition to remove the planner, Mr. Nadela, that homeowners from 249 households signed.
- RHME's park manager, Norma Martinez, contradicts herself. In the hearing, she says that she makes herself available during office hours to receive concerns; however, she tells residents that she has no authority to make decisions.
- RHME says that parking at the clubhouse is guest parking; this change of use occurred after the second CUP hearing; though, most residents don't know it yet.
- RHME claims that the community is friendly and open to the concerns of the residents; instead, they reject such complaints and prove arrogant towards the residents.

- RHME states that they charge a fair rent; their rates are 45% more than the rate at the only other park in Rowland Heights. This rent is the entire income of many residents. The rent increases much faster than the income increases.
- RHME says that raising the rent multiple times a year is a bad business practice that they would never commit; some residents received multiple rent increases in a single year.
- RHME brushes the towing issue aside; on June 14, 2016, an active MRA1441 member almost had a car towed in retaliation and the MRA1441 and LA County Sheriffs stepped in for the tow truck driver to release the car.

Residents living in the mobile home park seek a way to resolve their poor living conditions, most of RHME's misdeeds and perjury have exposed itself in public.

Public records for the CUP hearings can be found on http://planning.lacounty.gov/video/regional_planning_commission_meeting_2017-01-25/

2) RHME robs from the residents' through:

- Overpricing rent, causing the house value to fall more than 50%.
- Conspiring with a criminal towing company due to lack of guest parking; instead, using reserved parking spaces to make money.
- Retaliating against the president of the residents' organization in Bad Faith, forcing the victim's family to pay the attorney's fees for RHME's retaliatory act due to technicalities in the MRL.
- Degrading services including the unusable internet and removing facilities.
- Rejecting residents' reasonable requests.
- Intimidating residents and blocking residents' communication using oppressive actions and not hiring a Chinese speaking manager/interpreter.
- Retaliating against residents who attend Residents Association Meeting with forms of intimidation such as overcharged utilities, painting notices, and other similar actions.
- Fining senior residents for having caretakers.

3) Some of our government departments magnify damages from RHME's monopolistic powers.

- The LA county sheriff: witnessed, allowed, and even assisted criminal towing, and in depriving residents' rights of using mailing tubes and others.
- Regional Planning: negligently allowed RHME to illegally run their business without a CUP for 19 years, ignores the residents' petition to replace the bias case planner, and knowingly delayed the hearing time more than 3 hours, frustrating a protesting plan.
- Los Angeles Consumer Affairs: simply closed the cases of residents without taking any action.

- An HCD officer: did not approve Meng's awning support modification, participated in retaliation eviction case to act as a witness against Mr. Meng's family, and fabricated facts, in court, that he did not received a certified letter from president Meng's family.
- Previous State Senator and Assembly member: have received proposals more than a year from the MRA1441 to amend bias laws but did nothing during their time in office.

4) The joint meeting should resolve:

- Unaffordable rent with unfair increases
- Unusable internet and other poor living conditions
- Prohibition of the MRA1441 from using the mailing tubes
- Refusal of RHME to communicate with the MRA1441
- Oppression, discrimination, intimidation, and retaliation
- Compensation for conspiring with criminal towing companies, retaliatory evictions done in bad faith, and other cases
- A solution for residents living adjacent to Pearl of the East Plaza
- Honoring the ordinance to adjust excessive rent into fair rent with yearly adjustment in accordance to the CPI
- Investigations of officials' actions, resident's suicide, and criminal actions in RHME.

Also, it is possible to have a solution that brings rights back to the manufactured-homeowners in California through investigating corruption, practicing fair law enforcement, amending bias laws, and sanctioning bad faith park owners to reduce the bully-like, oppressive, extortive, intimidatory and criminal actions from mobile home parks. It is blessing for all.

Attachment:

Memorandum to the Los Angeles County Regional Planning Commission and Affiliates

The 1441 Manufactured-Home Residents Association (MRA1441) submits and declares the following points on the public hearing held on January 25, 2017. The MRA1441 requests the Los Angeles Regional Planning Commission (RPC) to declare its response.

1. The RPC has refused to provide the MRA1441, entrusted with the signatures of residents present in the audience, enough time to thoroughly express all their concerns.
2. Regional planning missed the Government Investigation Meeting before their hearing, on Jan 23, 2017 in RHME, knowingly negligent to hear from residents.

3. No county records acknowledge that the residents who participated in the CUP hearing held signs that read “Stop corruption” and “Replace Planner Mr. Nadela.”
4. The county counsel refuses to enforce LA County Ordinance 22.52.500 on the CUP that enacts to fix the excessive rent in mediation.
5. The RPC refuses to set up a mediation panel between the residents and the park owners to mediate a reasonable rent.
6. During the CUP hearing, one of the commissioners was absent without any explanation.
7. The RPC did not schedule a dedicated hearing for RHME’s CUP despite the large community response and participation.
8. RHME’s closing arguments in the public hearing were unrebutted. The hearing procedure restricts responses that should be heard.
9. To date, neither Los Angeles County nor RHME, in paper or through a representative, gave the MRA1441 any invitation to discuss or articulate the conditions of the permit.
10. The hearing officer’s reasonable decision of requiring quarterly meetings never came up.
11. The only opportunity the county gives the MRA1441 to express any form of discussion with county counsel occurred at public hearings, where the very nature of the hearing tarnishes any message the MRA1441 gives or any concerned residents.
12. The lack of communication between the county and the MRA1441 is in bad faith.
13. The lack of communication between RHME and the MRA1441 is in bad faith, even after the MRA1441 president, Ken Meng, shakes hands with representatives of RHME to work together to build a better community.
14. Interactions between the county counsel, the case planner, and RHME are outside the public eye.
15. Any false or incomplete testimony given by the applicants during the rebuttal period in the public hearing is irrefutable since no one can object to any closing arguments the applicant makes during this time, and most of the deceptive details arise during this period.
16. Three explanations were provided by different parties that refuse to resolve the excessive rent. The grandfather clause argument; the state exemption argument; and the argument that the law is outdated. None of these three argument have merit.
17. Evidence of retaliation was found by court that RHME directed retaliation towards the President of the MRA1441, Ken Meng, and his family, the court order was given to all commissioners right after the RHME repeated the lie that there is no retaliation in the park.
18. The Director of Regional Planning, Mr. Bruckner spoke before the end of the hearing directing the RPC to close the public hearing and ignore the main issue, excessive rent.

The Committee of MRA1441

Rowland Heights
MOBILE ESTATES

Ms. Connie Chung, AICP, Supervising Regional Planner
General Plan Development and Housing Section
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Re: Rowland Heights Mobile Estates
Input for Use in County Study for 10/17/17 Motion by Supervisor Hahn

Dear Ms. Chung:

We have been asked by the Western Mobilehome Park Owners' Association ("WMA") to submit information to contribute to the study of Los Angeles County mobilehome park market, per the motion of Supervisor Hahn on October 17, 2017. The report back to the Board of Supervisors was ordered to be provided within 60 days.

Rowland Heights Mobile Estates ("RHME" or "Park") is a mobilehome park, which was built and developed by my grandfather, Walter Kinsman. Starting as a 188-space park in the early 1970's, RHME expanded to 327 rental spaces during its early years in the first half of the 1970's. With 327 spaces, the park has provided housing for anywhere from 1000 to 1500 persons, approximately, perhaps more, for more than forty years. My grandfather always told me that taking care of the Park residents was the number one priority in operating the Park, and after taking over the operations management 12 years ago, I have made every effort to live up to my grandfather's business philosophy.

Typically, the "tenant" in a mobilehome park, referred to as "homeowner" under the MRL, owns the mobilehome, and rents the space on which it sits. The mobilehome ownership has the advantage over apartment renting because the mobilehome owner builds equity in the home, and does not have common walls with other renters. It has the advantage over owning the typical single family home because it does not have the additional costs associated with owning the land. It is thus an affordable alternative to the typical single family residence, but with advantages over renting a house or apartment: not only the equity in the mobilehome, recoverable upon resale, but also a small yard surrounding the home, with no joint walls with co-tenants.

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The MRL provides the homeowner the right to sell the mobilehome in place on the rental space. Thus, while the mortgage on the mobilehome and the space rent in total are comparable to apartment rents in many cities, unlike an apartment dweller, if the tenant/homeowner moves from the mobilehome park, he or she may sell the mobilehome and walk away with whatever equity was represented in the proceeds after sale. The mobilehome value in itself decreases over time, like a car, but because of its location in a mobilehome park, the price to be obtained for a mobilehome actually increases over time, similar to single family homes.

Of course, mobilehome parks vary in quality just as any other form of housing. RHME is a very sought-after park, located at 1441 S. Paso Real Avenue, Rowland Heights, CA 91748. In the past, RHME has been rated as a four (4)-star park out of five (5) stars. The desirability of RHME is demonstrated by the fact there are no empty spaces, and homes sell very quickly. The price of homes in RHME currently ranges from approximately $50,000.00 to $105,000.00. The value is mainly attributable to the home's being located in RHME. The size, age and condition of the home are secondary factors affecting the value of the home.

RHME boasts many quality amenities. It has a clubhouse with a piano, a community kitchen, a billiard room with two billiard tables, a conference room, a library, free wifi, a pool and spa, a "little tot lot" with swings and a playground, mainly for children ten (10) years and younger, and an RV storage area. There is also a laundry facility with four (4) washing machines and four (4) dryers. There are two (2) onsite managers in the Park Office, and three (3) onsite maintenance persons, who take care of all aspects of Park maintenance, except where the services of an expert are required in a particular area, such as out-of-the-ordinary electrical issues or plumbing repairs. There is plenty of vehicle parking within the park premises. Each rental space can accommodate at least 2-4 vehicles in the carport. Additionally, there are 114 spaces for other parking, including RV and guest parking. We are currently in the process of adding 24 more parking spaces.

Once a senior park, RHME has been an "all age" park for years. The resident population of approximately 1000-1500 persons of all ages are mainly of Chinese descent (approximately 90-95%), with the balance being mostly Hispanic and Caucasian. It is a quiet community with a low crime rate compared with the rest of the City of Rowland Heights, which itself also has a low crime rate compared with other cities state-wide and nationally.

There are various social activities in the park, including yoga and tai chi every morning conducted by residents in front of the clubhouse, and residents stroll the Park premises every morning and evening. We have a special event every month for example, an ice cream social is held at the end of summer, in August we have a back to school raffle and give out a gift card to purchase school supplies, in November we have a Thanksgiving food basket raffle and a cookie decorating party is scheduled for the holiday season in December. We offer coffee and pastries in the clubhouse every Friday morning, for all of our residents. Residents play the piano in the clubhouse, and some residents take lessons on the Park piano. Residents also use the billiard tables and other amenities.

There also many activities and features near the park, such as the Puente Hills mall; many shopping centers with numerous restaurants, ethnic and all-American; Chinese markets; family amusement centers; educational centers, including high quality public schools and private academies; community parks, one with horseback riding; social lounges with karaoke; a state-of-the-art Rowland Heights Civic Center, with banquet rooms, table tennis tournaments, and classes, exercise facilities, trail walking, and other features. There are also theaters and a dance center, as well as the Speedway, just minutes away, for those with a need for speed.

The residents of RHME are a well-behaved group, with very few evictions in the park, only 5 in the last 4 years. There have been only approximately 3 police calls to the park over the last 4 years, and only a few minor crimes over the last 4 years. Management never receives complaints from persons outside the park about the residents or the park operations.

The rents in RHME are moderate for the LA County area, ranging from $784.59 to $ 1,202.99. All but 33 spaces are on long term leases, exempt from rent control, with increases mainly in the area of 3% annually, although the Park refrained from a rent increase at all in 2014, based on concerns expressed by homeowners.

We also have a rent assistance program, using the guidelines of the Manufactured Housing Education Trust ("MHET"), for residents who are having trouble meeting their rent obligations.

We have been in the process of updating our CUP for the land under the Park. We have met with Supervisor Janice Hahn at the Park itself, and she saw first-hand what a

Rowland Heights
MOBILE ESTATES

beautiful and well-maintained Park RHME is. She also indicated her observation that we are good owners who care about the residents. Based on Supervisor Hahn's concern about the quality of communication, based on the language gap from many of the Chinese residents' inability to speak and understand English, we voluntarily implemented a program of providing a Mandarin interpreter to assist the residents in communicating with Park Management.

All in all, RHME is a high quality park, much in demand. It is definitely and indisputably an asset to the surrounding community, providing much-needed quality affordable housing in LA County.

Very truly yours,

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Support Letter by Frank A. Wodley

I have been asked to provide a letter to the County Board of Supervisors by Connie Chung, which I'm more than happy to do.

History of Advocacy

My history starts in the year 2002, about four years after moving into a mobilehome park (Chatsworth Mobile Home Park in Chatsworth, CA.)

I experienced harassment and intimidation by several park managers. They would yell and proclaim: "If you don't like living here, move!" We would have pet names for the magaziners, like "Sadama, Little Hitler, etc." This is not at all uncommon across California, even across the U.S.

2002 GSMOL Manager

In 2002 I became a GSMOL (Golden State Manufactured-Home Owners League) manager and chapter President. My goal was to work with management to resolve the many issues which existed in my park. Management had closed the clubhouse, was booting cars demanding money, was abusive (senior abuse), etc.

2004 COMO-CAL

In 2004 I helped organize the Coalition of Mobilehome Owners - California, a state-wide 501(c)3 non profit, tax exempt advocate for mobilehome owners.

I ran it until the end of 2016.

Mobilehome Magazine

I published the first issue of Mobilehome Magazine in September 2011. Since that time about 800,000 magazines have been printed and distributed to mobilehome owners around the state of California. 99% have been free.

All magazines are displayed on our three websites (see below) and may be downloaded page by page.

2017 - Mobile Home Owners Network

Recently I formed Mobile Home Owners Network (MHONET). Our philosophy, and goals haven't changed much since the formation of COMO-CAL 13 years prior. We still believe Strength in Numbers and Knowledge is Power. To that end, we are promoting Regional Groups across the state in lieu of one state-wide organization.

Ken Meng & Family

Ken Meng and his family have become my good friends over the last year or so. No where will you find a finer, more dedicated group. They have been mistreated by their park and have waged a four year fight to receive some justice, not only for their family, but also for their friends and neighbors in Rowland Heights Mobile Estates. I support Ken's efforts 110%.

Frank Wodley Contact Information

Mobilehome Magazine, % Frank Wodley, P.O. Box 3774, Chatsworth, CA. 91313.

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Email: fawodley@yahoo.com

Websites: www.comocal.org, www.mobilehomemagazine.org, & www.mhonet.org

Testimony in Favor of Reinstateing The Rent Stabilization Ordinance in Unincorporated Areas of Los Angeles County November 2017 - Frank Wodley, Advocate

I am totally in favor of the County reinstituting the RSO for the unincorporated areas of Los Angeles County. My argument is as follows:

A RSO Does Provide Some Protection

I live in Chatsworth MHP in Chatsworth. Fortunately, my park is one of about 60 in Los Angeles that are covered by the Rent Stabilization Ordinance. This Ordinance offers some protection to residents by limiting rent increases. My rent has increased from about $500 in 1998 to over $900 today and I'm thinking about leaving, but to what?

Just 5 miles away in Woosley Canyon, mobilehome owners are abandoning their high priced homes at The Summit and Mountain View Mobile Home Park. Why? Because they are at the mercy of their park owner. They have no rent protections so their rents are upwards of $1500 per month. In fact, rents there are about 35% higher than in Chatsworth and Canoga Park.

How Does The RSO Effect Park Owners?

The L.A. City RSO treats park owners very fairly. Increases are based on 100% of the yearly CPI, while advocates feel this is excessive and should be more like 66% of the CPI.

There is a minimum 3% yearly increase which benefits park owners in those years when the CPI is less than 3%. Over the last 20 years, several have had CPIs lower than 3%.

Park owners also receive 50% of any capital improvements to their property, up to $55/month.

Park owners can raise rents 10% to buyers of homes (vacancy control).

The Unfair Playing Field - David Vs Golaith

Mobile/manufactured home owners do not get a fair shake, period! Residents really have no where to turn. Since high rent increases have desastating effects on residents, it is critical the County Board of Supervisors, led by Janice Hahn and Sheila Kuehl, at least provide some protection.

Few are aware, especially our representatives, of the vulnerability of mobilehome owners. They are absolutely at the mercy of their park owner.

As an advocate, I will continue working to unite mobilehome owners and enable them to protect themselves.

Here are some examples of the 'unfair playing field.' Details can be found later in this testimony.

A) Park owners have resources, residents do not. This means those park owners wanting to violate the law can usually get away with it.

B) Park owners are organized and are represented by strong organizations, namely the Western Manufactured Housing Communities Association (WMA) and the Manufactured Housing Education Trust (MHET).

C) The Los Angeles Mobile Home Park Task Force is a sham and organized in favor of park owners.

D) The go-to advocacy for mobilehome owners (Golden State Manufactured Home Owners League - GSMOL) has declined over the last 30 years and today is close to shutting their doors. They have been very ineffective in protecting mobilehome owners over the years. They have increased the number of laws, in the Mobilehome Residency Law; however laws don't protect residents if and when there is no viable enforcement. The present form of enforcement, i.e. hiring an attorney and litigating to receive justice, is just not something mobilehome owners are able to do.

E) Existing laws benefit park owners, although often the investment of residents in their homes is greater than the park owners investment in the land.

F) Mobilehome owners are expected to enforce the law (Civil Code - Mobilehome Residency Law) themselves, i.e. hire an attorney and litigate. However, resident advocates testified, before the Senate Select Committee in 1987, that this is not a viable form of enforcement. As a consequence, mobilehome owners have essentially had no rights, ever, in the 60 year history of renting spaces in mobilehome parks.

G) The veto of AB1269, a law which would have provided some enforcement of the law.

H) The government agency Housing and Community Development (HCD) doesn't help mobilehome owners. It favors park owners.

DETAILS

(a) Resources - Park Owners Vs Mobilehome Owners

Everyone knows mobilehome parks are cash cows. Every dollar of rent over about $150/space/month is profit. Rents in my park of 200 spaces average about $750. That equates to a monthly profit of $120,000 or $1,440,000 per year. Multiply that by over 4,500 mobilehome parks in California and you get a sense of the resources park owners have at their disposal.

On the other hand, many living in mobilehome parks are seniors on fixed incomes. For example, my family and I have lived at Chatsworth MHP for almost 20 years. I'm 74, and my wife 63. She works 12 hours a week, and I get a small Social Security check every month which doesn't even pay our rent. Plus we have a 22 year old still at home. Our situation is not uncommon. Yet we are expected to protect ourselves, i.e. enforce the law (by hiring an attorney and going to court) to protect our rights. Let's face it, as a consequence we do not have any rights.

(b) Park Owners Fight To Eliminate RSO

Park owners are always trying to eliminate 'rent control.' The park owner lobby is very strong. In just the last 20 years they have tried to abolish Rent Stabilization Ordinances in California three different times. First with Proposition 99 in 1998, then with Proposition 90 in 2006 and 98 in 2008. Fortunately, neither passed.

(b) Park Owners Have Strong Representation

The park owners have multiple lobbyists in Sacramento representing their interests. Mobilehome owners have one, part time lobbyist.

Plus remember, new laws don't protect unless there is a viable form of enforcement. Although it has long been understood that hiring an attorney and going to court DOES NOT work for mobilehome owners, our go-to statewide advocate has promoted such a plan for years.

(c) L.A. Mobile Home Park Task Force (LAMHPTF)

The LAMHPTF provides no assistance to the L.A. Mobilehome Community. I'd guess less than 1% of mobilehome owners in L.A. know about it. It is a bad joke. It is a political ploy to give the impression mobilehome owners are protected. Park attorneys, park owners and owners of management companies sit on one side of the table while often times mobilehome owners with little expertise sit on the other. One time I asked 'Why can't we have an attorney sit with us?' Their response was "Oh, we wouldn't want that!" This is David vs Golaith all over again. Mobilehome owners don't have a chance!

(d) Mobilehome Owners Have Poor Representation

GSMOL has declined over the past 30 years. They have promoted enforcing the Civil Code by hiring an attorney and going to court, knowing all along it doesn't work. A park owner, Mr. Maurice Priest, essentially ran GSMOL between 2002 and 2009 and GSMOL has been plagued by poor leadership, mismanagement and non-transparency. Membership is about 10% of what it was in the

(e) Who Has The Bigger Investment

Often times, mobilehome owners have a bigger investment than the land owner, yet the laws benefit the landowner. Is this fair? We don't think so.

The law gives the park owner the right to accept a new resident (when a resident sells his/her home). However, this 'right' is often misused. Often park owners deliberatly do not approve a buyer, i.e. they interfere with a resident selling his home. Why? The park wants to force the resident to walk away and sell his home to the park for pennys on the dollar. This is happening all over the state of California.

(f) Mobilehome Owners Have No Rights

In 1987, resident advocates testified before the Senate Select Committee on Mobilehomes that the present form to enforce the Civil Code (Mobilehome Residency Law) does not work. They stated: a) Mobilehome owners do not have the resources to hire an attorney, often times $150/hour and more. b) Qualified attorneys are very difficult to find, c) Residents simply don't have the time to go to court in a protracted litigation.

Our state-wide advocate GSMOL had the support (100,000 members) and the resources ($1.5 million/year) to pass legislation to provide a viable means of enforcement; however, they did nothing. Instead, there was infighting to see who would gain control over the organization.

(g) The Veto of AB1269

Last month California Governor Jerry Brown vetoed AB1269, the Mobilehome Residents and Seniors Protection Act which would have provided some enforcement of the Civil Code beginning 2020. As a concequence, mobilehome owners are still without rights. The Fair Employment and Housing Department would have done a good job enforcing the Civil Code. Alas, not to be.

The Devastating Effects of Rent Increases

Residents Homes Devalue With Every Rent Increase

One huge factor often overlooked when considering the effect of rent increases on mobilehome owners is the fact that **rent increases decrease a home's value**. Some have estimated for every $10 a rent increases, the value of the home decreases $1000. So rent increases have huge impacts – not only the outlay of extra money each month for rent, but the decreased value of resident's homes.

Ken Baar, a noted expert in the field, made the following statement to me in an email on September 22, 2017:

"The reality has been that steep increases in rent have big impacts on mobilehome values, because potential mobilehome owners feel the home is of littlle value if the rent is very high."

Higher Rents Benefit Park Owners Many Ways

Park owners know the real value of a rent increase and are always looking at ways to get ever higher increases.

First of all, higher rents mean more revenue for the park owner, which in turn means more profit for his business. Higher profits increase the value of the park. In other words, the incentive of park owners to push for higher and higher rent increases is huge.

Only the government can step in and say 'enough is enough.' Rents must be kept at levels that benefit both park owners and residents.

Residents Are Very Vulnerable

A One-Two-Three Punch

Rent increases are not the only challenge park residents face. Some must contend with an unscrupulous park owner, one who routinely breaks the law for financial gain. You may ask how can this be? We have laws don't we?

It is simple. Park owners and resident advocates have long known that there is no viable enforcement of the MRL. Mobilehome owners have always been responsible to enforce the law (Mobilehome Residency Law), yet few do so because of the high cost of legal help, few attorneys and judges really understand mobilehome law, and seniors don't have the time for protracted litigation. Instead, they simply keep silent and do not challenge the illegal acts of their park owners.

The Killer Punch That Puts Residents Down

Many mobilehome owners face a killer punch when they try to sell their homes. The law allows the park to qualify prospective buyers on two points: 1) Can they afford to pay the monthly rent and 2) Will they follow park rules and regulations.

On the surface, qualifying for tenancy should be no big deal; however, this presents an opportunity for some park owners to make extra money by 'bending' the law. And many do! How do they do that? They employ several different methods:

- The park won't qualify a buyer, even though by law the buyer does. This is illegal.
- The park will saddle the seller with a list of expensive improvements and tell them they are required if the home stays in the park. This is illegal.

Many parks 'interfere' with the sale of mobilehomes. Why not? They have everything to gain and very little to lose. They hope interfering will discourage the seller and he'll sell to the park for pennies on the dollar just to leave. This happens across California and has happened in my park also

850 Credit Score Required

Another example. A park in Capitola requires the buyer to have a credit score of 850! (See November 2013. Management Uses Credit Report to Deny Tenancy.)

However, the law states: "Approval shall not be withheld if the purchaser has the financial ability to pay the rent and charges of the park unless the management reasonably determines that, based on the purchaser's prior tenancies, he will not comply with the rules and regulations of the park." Nowhere in this civil code does it list that a buyer has to have an 850 credit score or higher as criteria to approve or deny a potential resident.

We believe requiring a credit score of 850 is illegal, but we have no resources to fight it.

Cash Buyers Don't Qualify

Often a buyer is retired and no longer working, but they have considerable savings in the bank. They offer to pay all cash for a mobilehome and certainly can make the monthly rent payments. However, this person is often denied tenancy by the park - a clear violation of the law. So what happens? The seller can't afford to hire an attorney, nor can he find one. The buyer gets cold feet and looks elsewhere. The park has interfered with the sale, and perhaps the seller decides to sell to the park for pennies on the dollar. This is illegal.

No Reason Given

Although the park is required to give a reason to deny a prospective tenant, many do not. Again, a clear violation of the law.

Another Opportunity For The Park to Make Money

Another problem area is when the owner of a home dies, leaving the home to his/her heirs. More often than not, heirs are helpless against the park because they have no idea how parks operate.

The Law Favors Eviction & Loss of Home

Do you know a park can give a resident a three day notice to pay or quit on the 7th of the month for which the rent is due and unpaid. After the 3 days, just 10 days after the rent is due, park owners often ask their attorneys to force the resident to walk away from their home and give it to the park!

In other words, in just 10 days a resident can lose his/her home! If that were happening in the stick-built world, there would be a huge outcry. But this is the world each mobilehome owner faces on a daily basis.

And what then? If a resident loses his/her home, they could very well become homeless.

Mobilehome Owners Are Defenseless

Park owners are organized and have the resources to usually get their way. Mobilehome residents are usually lower income, with few resources. They often are seniors on fixed incomes who can least afford high rent increases. Park residents are very poorly organized and tend to stay to themselves, not wanting to get involved.

We have presented just a few examples of the challenges residents face in a rental park. More often than not, they have no way of fighting against park owners who violate the law. They are vulnerable and can not defend themselves and their few rights. It is David and Goliath all over again.

Ken Meng's Determination to Get Justice

Ken Meng and his family have spent several thousand dollars and four years fighting to get justice. It is obvious that Rowland Heights Mobile Estates has broken the law on numerous occassions.

Most other families would have shrugged their shoulders and sold their home just to get away. But Ken Meng is not like most other mobilehome owners. He is determined to get justice, and we believe with the help of the County Board of Supervisors, he will prevail.

Goverment Must Help Mobilehome Owners

Where can the Meng family turn? Fortunately they have a sympathic ear in Supervisor Janice Hahn and Windy Gruel. Without such government leaders, the Meng family's situation would be hopeless. I applaud the County Board of Supervisors in their efforts to give some protection to mobilehome owners.

What Is The Impact of a County-Wide RSO?

So how many mobilehome owners would be affected? There are approximately 2,000 mobilehome spaces in the unincorporated area of Los Angeles County.

Is an Ordinance Necessary?

Is an Ordinance really necessary? You bet it is. Take the case of two parks in Woosley Canyon that are less than 5 miles from my park in Chatsworth. Space rents are nominally over $1,500/month and as a consequence many have already walked away from their homes. This unfairly enriches park owners, at the cost of those who can least afford to lose their homes. By the way, rents at Chatsworth MHP average approximately 50% of those in Mountain View or Summit – approximately $750/month.

Our hope is L.A. County Board of Supervisors will intervene and provide these mobilehome owners some rent protection.

In Summary

Park owners in California hold considerable advantages over their residents. Most can increase space rents at will, which is a huge burden on California residents who can least afford these increases. Increases lead to property devaluation, often times sucking all the equity from a mobilehome.

Park owners are able break the law, at will, since there is no viable way for residents to enforce the Mobilehome Residency Law. Residents also face challenges at time of sale or when homeowners die.

Park owners have strong advocates (Western Manufactured Housing Communities Association – WMA & the Manufactured Housing Education Trust (MHET).

One might say, well residents are protected by their representation in the L.A. City Mobile Home Park Task Force; however, the facts do not support this perception.

A RSO for the unincorporated areas of L.A. County would provide some protection against high rent increases for 2,000 families. We applaud Supervisors Janice Hahn, Sheila Kuehl and others for their efforts to help these folks. However, much more should be done to protect a defenseless class of American citizens living in Los Angeles.