



Santa Cruz County Mobile and Manufactured Home Commission

701 Ocean Street, Fifth Floor, Room 510
Santa Cruz, CA 95060
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commissions@santacruzcountycalifornia.gov
www.sccmmhc.org

Notice of Public Meeting and Agenda

DATE: Thursday, March 20, 2025

TIME: 11:30 AM to 1:00 PM

LOCATION: United Way of Santa Cruz County, 4450 Capitola Road, Ste 106, Capitola, CA 95010

****As a courtesy to those who are affected, kindly attend the meeting *scent-free* and *smoke-free*.****

1. Call to Order/Roll Call/Agenda Review
2. Approve *January 16, 2025 Meeting Minutes*
3. Public Comment: *Any person may address the Commission for a period not to exceed 3 minutes on matters within the Commission's jurisdiction. The Commission will not take action but may choose to follow up at a subsequent meeting.*
4. County Supervisor Report
5. New Business/Continuing Business/Action Items:
 - 5.1. Santa Cruz County Mobile Home Park Conversion Ordinances Overview
 - 5.2. Disaster Preparedness and Recovery for Mobile Homes in Parks
6. Commissioner Reports
 - 6.1. District 1 (*Brocklebank*)
 - 6.2. District 2 (*Cleveland*)
 - 6.3. District 3 (*Walker*)
 - 6.4. District 4 (*Valdez*)
 - 6.5. District 5 (*Halterman*)
 - 6.6. Golden State Manufactured Homeowners League (*Lerno*)
 - 6.7. Western Manufactured Housing Communities (*Solyman*)
7. Central Coast Resident-Owned Parks Report
8. Legislative Report
9. County Counsel Report
10. Staff Report
11. Correspondence
12. Adjournment

Next Meeting Scheduled for: 11:30 to 1:00 PM on Thursday, May 15, 2025

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MOBILE AND MANUFACTURED HOME COMMISSION MEETING MINUTES

DATE: January 16, 2025

LOCATION: United Way Community Room, (4450 Capitola Road, Ste 106, Santa Cruz, CA 95010)

PRESENT: Jean Brocklebank (*Chair - 1st District*), Henry Cleveland (*2nd District*), Candi Walker (*3rd District*), Richard Valdez (*4th District*) Rick Halterman (*5th District*), Carol Lerno (*GSMOL*)

EXCUSED: Charlene Solyman (*Vice Chair - WMA*)

ABSENT: None

STAFF: Kaite McGrew (*Commissions Manager*), Suzanne Yang (*County Counsel*)

GUESTS: Jamie Sehorn (*District One Analyst*) and 12 members of the public attended.

1. Call to Order/Roll Call/Agenda Review
Meeting convened at 11:28 AM.

2. Approve *November 21, 2024 Meeting Minutes*
Motion to approve *November 21, 2024 Meeting Minutes*.
Motion/Second: Cleveland/Halterman
Motion passed unanimously.

Lerno arrived.

3. Public Comment:
4 members of the public provided public comment.

4. County Supervisor Report
Sehorn provided the following update on the sale of Soquel Garden MHP:

- Soquel Gardens MHP has been sold to Harmony Communities with only nine homeowner residents remaining out of 20 spaces. The HCD will not issue the permit-to-operate until all outstanding issues have been addressed including the critical electrical and fire safety issues, but they are confident that Harmony will address them quickly and efficiently. Brocklebank added applicable MHP closure ordinances to the next meeting agenda as an informational item

5. New Business/Action Items:

5.1. District One Mobile Home RTC Encroachment Update

- Brocklebank provided an update on the status of the encroachment issues at Castle and Blue and Gold Star MHPs. Reportedly, residents were given a deadline by which they had to remove all encroachments or the RTC would conduct removals and attempt to recover the cost of such removal. Sehorn reported that Supervisor Koenig's office met with RTC senior staff to discuss next steps for the rail trail encroachment issue. The RTC is in the process of obtaining and reviewing legal documents, including lease agreements and park rules. Affected residents can reach out to Grace Blakeslee at the RTC to schedule a meeting with RTC staff on site to discuss encroachments on a case-by-case basis. The time it takes to resolve this issue in court has been factored into the

project timeline to keep the project on schedule. Halterman clarified that Castle is a nonprofit-owned park which may be under different regulatory requirements than an investor-owned park like the Blue and Gold Star. The final report is scheduled to be presented in June 2025. The RTC will work with HCD to encourage them to grant setback variances and otherwise minimize the impact on residents.

5.2. Consider Commission Bylaws Revision

Commission considered revising their bylaws to reflect their new regular meeting location and start time of 11:30 AM.

Motion to approve revisions to the Commission Bylaws

Motion/Second: Lerno/Halterman

Motion passed unanimously.

6. Commissioner Reports

6.1. District One (Brocklebank)

Brocklebank reported communicating with residents on a variety of matters in 5 MHPs including Carriage Acres, Ocean Breeze, Old Mill, Soquel Gardens, and Shangri-la. Commission would like to discuss the issue of park owners blocking the sales of mobile homes at a later meeting.

6.2. District Two (Cleveland) No Report

6.3. District Three (Walker): No Report

6.4. District Four (Valdez):

Valdez reported referring another resident to attorney Will Constantine for legal advice. Lerno shared some additional information about difficulties Watsonville residents are having on space rents being increased upon the sale of homes. Cleveland believes that Watsonville does have “vacancy control” which should prevent this from happening. Lerno believes the information should be provided in any transfers of ownership. Halterman recommended contacting the City Council.

6.5. District Five (Halterman):

Halterman reported that as of January 1, 2025, all long-term mobile home space leases are eligible for rent control. Park owners are attempting to use this change to negate existing leases and require new leases to be signed. Halterman spoke with Dawn Addis’s office who state they are willing to intervene in the RTC encroachment issue and help to determine whether the MORE program can provide financial assistance to residents impacted.

6.6. Golden State Manufactured Homeowners League (Lerno): No Report

6.7. Western Manufactured Housing Communities (Solyman): Not Present

7. Central Coast Resident-Owned Parks (ROP) Report:

Cleveland shared that the Master Meter Conversion Project which has a goal of converting 50% of all California MHPs by 2030. Resident-owned parks are being impacted by the Corporate Transparency Act which requires all small businesses and HOA board members to report their personal identification information to the federal agencies. There is an effort underway to overturn the legislation.

8. Legislative Report:

Halterman reported that no MHP bills to date this year.

9. County Counsel Report: No Report

10. Staff Report:

Staff provided an update on newly contracted representation from *Legal Services for Seniors Monterey County* (LSSMC). The attorney working with residents is David Ramsey who previously served as Executive Director for California Rural Legal Assistance (CRLA) in Watsonville and is very familiar with local mobile home law. Residents from Old Mill and Pinto Lake Estates for both the General and Special Rent Adjustment petitions have been referred. Pinto Lake residents have been advised that they are free to work with other legal representation, but a portion of those fees can only be paid by the Space Fee fund if their private attorney is willing contract with the County and only for work done after the contract has been signed. No dates have been scheduled for settlement conferences or hearings yet, although the latest allowable dates have been determined and communicated to the residents for all three petitions.

11. Correspondence:

12. Adjournment

Meeting adjourned at 1:00 PM.

Submitted by: Kaite McGrew, *Commissions Manager*

Chapter 13.30 MOBILE HOME PARK CONVERSIONS

Sections:

13.30.010 Purpose.

13.30.020 Definitions.

13.30.030 Applications for mobile home park conversions.

13.30.040 Procedures for review.

13.30.050 Findings.

13.30.060 Conditions.

13.30.010 Purpose.

The unrestricted conversion of mobile home parks to other uses diminishes the mobile home stock and spaces available. The protection of residents and potential purchasers of mobile homes warrants the implementation of certain regulatory safeguards. The County recognizes the need to ensure that the private sector exercises its responsibilities to provide varied housing choices and opportunities, and that the County participation in this responsibility is necessary. [Ord. 2844, 1980].

13.30.020 Definitions.

For purposes of this chapter, the following words are defined as follows:

- (A) "Park" means a mobile home park which rents spaces for mobile home dwelling units.
- (B) "Owner" means the owner, lessor, or designated agent of the park.
- (C) "Tenant" means the owners of a mobile home dwelling unit who is renting space from the owner of a park. [Ord. 2844, 1980].

13.30.030 Applications for mobile home park conversions.

- (A) The use of property as a mobile home park shall not be terminated for the purpose of conversion to another land use until application for a mobile home park conversion has been made to the Planning Director and approval has been received from the Planning Commission or the Board of Supervisors on appeal.
- (B) No building permit shall be issued on property occupied by a mobile home park for uses other than those associated with the mobile home park use until approval for mobile home park conversion has been obtained pursuant to this chapter.
- (C) Applications for a mobile home park conversion shall be made to the Planning Director with the filing fee prescribed by resolution of the Board of Supervisors. The application shall contain the following information:

- (1) Plans indicating the use for which an application for conversion is made.
- (2) The timetable for conversion of the park.
- (3) If the proposed conversion is to a use not consistent with the underlying zone district, the applicant shall file concurrently an application for rezoning.
- (4) The total number of spaces within the park; the number of spaces occupied; the length of time each space has been occupied by the present tenant; and the monthly rent currently charged.

(D) An application for a mobile home park conversion shall be subject to environmental review in accordance with the County's environmental impact review guidelines. [Ord. 2844, 1980].

13.30.040 Procedures for review.

(A) Within 90 days following the submittal of all required information in connection with an application for a mobile home park conversion and completion of the environmental review, the application shall be set for public hearing before the Planning Commission.

(B) The Planning Commission shall, within 30 days after the close of the public hearing, render a decision whether the conversion should be approved based upon the findings set forth in [SCCC 13.30.050](#).

(C) Any applicant, or any other person aggrieved, or any other person whose interests are adversely affected by any act or determination of the Planning Commission, may appeal the act or determination to the Board of Supervisors in accordance with [SCCC 18.10.300](#) et seq. For this purpose, the procedure therein set forth is incorporated herein and made a part of this chapter. [Amended during 9/07 supplement; Ord. 4496-C § 68, 1998; Ord. 2844, 1980].

13.30.050 Findings.

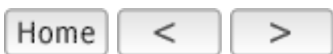
An application for a mobile home park conversion may be approved if the following findings are made:

- (A) There exists sufficient mobile home space availability within the County of Santa Cruz to accommodate the mobile homes to be displaced by reason of the conversion.
- (B) The conversion will not result in the displacement of low income individuals or households who cannot afford rents charged in other parks.
- (C) That the age, type, and style of mobile homes within the park proposed for conversion can be accepted into other parks within the County of Santa Cruz.
- (D) If the conversion is to another residential use, that the tenants of the mobile home park will have first opportunity to occupy the units and the construction schedule will not result in long-term displacements.
- (E) The proposed conversion is consistent with the County General Plan.
- (F) The proposed conversion is pursuant to the public health, safety and welfare.
- (G) The conversion will not result in a shortage of housing opportunities and choices within the County of Santa Cruz. [Ord. 2844, 1980].

13.30.060 Conditions.

In the approval of a mobile home park conversion, the County may attach conditions deemed reasonable in order to mitigate the impacts associated with the conversion. Such conditions may include, but are not limited to, the following:

- (A) Full or partial payment for relocation of mobile homes to another park.
- (B) If the land occupied by the park is to be sold, the tenants be given the first right of refusal accepting the offer of the seller for the purchase of the park including all improvements.
- (C) The tenants be given the option of a long-term lease of the land and purchase of the improvements.
- (D) An effective date of the approval of the conversion of not less than one year so as to provide sufficient time for the relocation of the mobile homes to other parks.
- (E) If the mobile homes cannot be relocated to parks in the area, the applicant may be required to purchase said mobile homes at fair market value, determined by an independent appraiser with mobile home expertise. [Ord. 2844, 1980].



The Santa Cruz County Code is current through Ordinance 5462 passed November 19, 2024.

The Santa Cruz County Codes are provided here as a public service. This online version of the County Code should not be relied upon for legal determination. Official Santa Cruz County Codes are on file in the Office of the Clerk of the Board. The County of Santa Cruz is not liable for any omissions or inaccuracies and is not liable for any reliance on these codes by the reader. It is recommended that you consult official Santa Cruz County Codes in the Office of the Clerk of the Board.

County Website: <https://www.santacruzcountyca.gov/>

County Telephone: (831) 454-2323

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Chapter 13.31 MOBILE HOME PARK CLOSURES

Sections:

13.31.010 Purpose.

13.31.020 Definitions.

13.31.030 Applications for mobile home park closures.

13.31.040 Procedures for review.

13.31.050 Required findings for approval.

13.31.060 Conditions.

13.31.061 Severability.

13.31.010 Purpose.

- (A) This chapter shall be known as the Mobile Home Park Closure Ordinance.
- (B) The County has adopted the regulations described in this chapter for the following purposes:
- (1) To ensure that Chapter [13.30](#) SCCC is not circumvented through the use of early park closures.
 - (2) To ensure that the homeowners who will be displaced by a proposed park closure, as well as the affordable housing stock located in the mobile home parks in the County, are provided with the protections that Government Code Sections [65863.7](#), [66427.4](#), [66473.5](#) and [65302](#), and related sections of California's Housing Elements Law, and Civil Code Section [798.56](#)(g) provide.
 - (3) To provide procedures that will allow proposed park closures to be properly evaluated in compliance with the above statutes and with the related provisions of this chapter. [Ord. 5323 § 1, 2020].

13.31.020 Definitions.

For purposes of this chapter, the following words are defined as follows:

- (A) "Park" means a mobile home park which rents spaces for mobile home dwelling units.
- (B) "Owner" means the owner, lessor, or designated agent of the park.
- (C) "Tenant" means the owner of a mobile home dwelling unit who is renting space from the owner of a park. [Ord. 5323 § 1, 2020].

13.31.030 Applications for mobile home park closures.

(A) The use of property as a mobile home park shall not be terminated for the purpose of closing a park, or to cease using the land on which it is located as a park, until application for a mobile home park closure has been made to the Planning Director and approval has been received from the Planning Commission or from the Board of Supervisors on appeal.

(B) Applications for a mobile home park closure shall be made to the Planning Director with the filing fee prescribed by resolution of the Board of Supervisors. The application shall contain the following information:

(1) The timetable for closure of the park.

(2) The total number of spaces within the park; the number of spaces occupied; the length of time each space has been occupied by the present tenant; and the monthly rent currently charged.

(C) A park closure certificate shall be submitted with the application that demonstrates that the park must be closed early because the owner is unable to make a reasonable return on the owner's investment in the park by continuing its operation as a rental park during the time period that the owner needs to determine a new use for the park and apply for its necessary local permits. To meet this burden, the certificate shall be signed by the owner, under penalty of perjury, and it shall state specifically articulable facts that it supports with appropriate documentary or other evidence.

(D) An application for a mobile home park closure shall be subject to environmental review in accordance with the County's environmental impact review guidelines. [Ord. 5323 § 1, 2020].

13.31.040 Procedures for review.

(A) Within 90 days following the submittal of all required information in connection with an application for a mobile home park closure and completion of the environmental review, the application shall be set for public hearing before the Planning Commission.

(B) The Planning Commission shall, within 30 days after the close of the public hearing, render a decision whether the closure should be approved based upon the findings set forth in [SCCC 13.31.050](#).

(C) Any applicant, or any other person aggrieved, or any other person whose interests are adversely affected by any act or determination of the Planning Commission, may appeal the act or determination to the Board of Supervisors in accordance with [SCCC 18.10.300](#) et seq. For this purpose, the procedure therein set forth is incorporated herein and made a part of this chapter. [Ord. 5323 § 1, 2020].

13.31.050 Required findings for approval.

An application to close a mobile home park, or to cease using the land on which the park is located as a park, shall not be approved unless the following findings are made:

(A) That a park closure certificate has been filed and reviewed, and a determination has been made by the Planning Commission, or by the Board of Supervisors on appeal, that it meets the requirements of [SCCC 13.31.030\(C\)](#) and that it demonstrates that the owner is unable to make a reasonable return on the owner's investment in the park by continuing its operation as a rental park during the time period that the owner needs to determine a new use for the park and apply for its necessary local permits.

(B) That the mitigation requirements of Government Code Section [65863.7](#) have been met and that conditions of approval, under SCCC [13.31.060](#), have been imposed on the approval of the closure that will enable the tenants displaced by the park closure to obtain adequate housing in other mobile home parks within Santa Cruz County. [Ord. 5323 § 1, 2020].

13.31.060 Conditions.

In the approval of an application to close a mobile home park, or to cease using the land on which the park is located as a park, the County may attach conditions deemed reasonable in order to mitigate the impacts associated with the closure. Such conditions may include, but are not limited to, the following:

- (A) Full or partial payment for relocation of mobile homes to another park.
- (B) If the land occupied by the park is to be sold, the tenants be given the first right of refusal accepting the offer of the seller for the purchase of the park including all improvements.
- (C) The tenants be given the option of a long-term lease of the land and purchase of the improvements.
- (D) An effective date of the approval of the closure of not less than one year so as to provide sufficient time for the relocation of the mobile homes to other parks.
- (E) If the mobile homes cannot be relocated to parks in Santa Cruz County, the applicant may be required to purchase said mobile homes at fair market value, determined by an independent appraiser with mobile home expertise. [Ord. 5323 § 1, 2020].

13.31.061 Severability.

If any section, subsection, sentence, clause, phrase, or word of this chapter is for any reason held to be invalid, the validity of the remaining portions of this chapter shall not be affected. [Ord. 5323 § 1, 2020].

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Mobile homes are some of California's last affordable housing. Can they rebuild after LA fires?

By Felicia Mello
February 12, 2025

In summary

Mobile home residents don't know when or if they will be able to rebuild their homes. Local, state, and federal decisions will affect the fate of some of California's dwindling lower-priced housing.

When the Palisades Fire [tore through coastal Los Angeles last month](#), it obliterated not only the sprawling mansions of celebrities, but two seaside mobile home parks where hundreds of retirees and other long-time residents clung to a middle-class lifestyle in one of the area's last bastions of affordability.

Now, post-fire, local and state officials will reveal just how far they'll go to ensure the recovery preserves housing for Angelenos who aren't rich. Their response could set a precedent as California faces a likely future of more frequent and intense natural disasters on top of a statewide housing crisis. And the fate of the two parks, Palisades Bowl Mobile Estates and Tahitian Terrace, may foreshadow how climate change could affect other mobile home owners in California.

With the fire finally 100% contained as of Friday, displaced park residents say they're no closer to answers about the future of their close-knit neighborhoods. The owners of Palisades Bowl Mobile Estates say they're weighing their options.

Two big questions remain: Will the state or the city of Los Angeles constrain what park owners can do with their land in order to preserve affordable housing in the area? And will officials pony up any money to help them do it?

The two parks may have been more glamorous than most of California's other nearly 6,000 mobile home parks, with their stunning views of the Pacific Ocean and a mix of two-story luxury models alongside modest trailers. But residents still face challenges that can make a mobile home owner's path to disaster recovery more difficult than that of single-family homeowners.

For one, they're more likely to be uninsured or underinsured, due in part to insurers' reluctance to cover manufactured homes, said Ryan Sears, a policy advocate for Neighborhood Partnership Housing Services, a non-profit affordable housing developer that builds fire-resistant mobile homes. On top of that, the parks were located in a state-designated high-risk fire zone.

"You're in what the state is saying is one of the worst possible areas to have a home, and me as an insurer with a bias against manufactured homes, I'm looking at that and thinking that's just a box of matches sitting in the middle of a ring of fire," Sears said.

Since residents owned their homes but leased the land underneath them, whether and when they're able to rebuild will also depend on whether park owners choose to replace infrastructure damaged in the fire.

"If you're a (single-family) homeowner elsewhere in the Palisades, as terrible as it is to have lost your home, at least you retain the right to return to the land," said state Sen. Ben Allen, a Democrat who represents Pacific Palisades. Mobile home residents, by contrast, "don't even know what the plan is," he said. "There's an additional layer of uncertainty and a potential for total loss."

Residents wait for answers

While home values in the parks ballooned in recent decades, surpassing \$1 million in some cases, residents who bought in years ago were paying as little as \$600 per month for rent-controlled lots, not including the cost of their home. That made the area a haven for everyone from retired couples to supermarket employees, Sears said.

Nicole Miller, a retired florist, moved into the Palisades Bowl Mobile Estates in the early aughts, paying \$340,000 for a small mobile home, "the kind your grandma would own," just a crosswalk away from the beach.

"Somebody told me about this mobile home park on the Pacific Coast Highway that was a little gem and I should look into it," said Miller, 67. She immediately fell in love with the balance of independence and community in the area, where she could tend the plants in her fenced-in yard and join her neighbors for water aerobics in the community pool. "We all respected each other's privacy but looked out for each other," she said.

Since the fires, Miller, who is staying with an uncle in Palm Springs, says she spends a lot of each day just staring into space. She thinks about her former neighbors, many of whom have scattered to different parts of the state.

Miller had paid off her home and owed \$980 per month in rent for her space, affordable on her fixed income. Palisades Bowl management has paused collecting rent since the fire, but Miller and other residents worry that this could provide a pretext for evicting them in the future, since

their leases say that a catastrophe does not provide an excuse for non-payment, Miller said. She said residents also haven't received a promised refund of the rent they paid at the beginning of January, or heard anything from park owners about their plans.

"We aren't any better off today than we were the day after the fire," she said.

The right to rebuild

California law says mobile home park owners who rebuild after a natural disaster [must allow tenants to return](#) — but that they can increase rental rates to cover the cost of rebuilding.

As residents continued to sift through the rubble of Palisades Bowl last week, looking for their belongings, co-owner Colby Biggs said park owners were still assessing the damage and planned to ask the Army Corps of Engineers for help with the cleanup by early this week. That help will give the park owners a better sense of the cost to rebuild, said Biggs, who represents a family trust with a 50% stake in the property.

His grandparents bought the 150-unit mobile home park in 2005, and some of the units dated back to the 1950s, he said. Mortgage insurance will cover the loss of the clubhouse and office buildings, he said, but not any of the underground infrastructure that makes the park run.

"If we have to go invest \$100 million to rebuild the park and we're not able to recoup that in some fashion, then it's not likely we will rebuild the park," he said. "If we can get federal or state funding, it's a different story."

"We're not evicting anybody," Biggs said. "But if the park's not rebuilt, then obviously the residents wouldn't have the right to reoccupy the park."

A state law known as the [Mello Act](#) requires that any affordable housing demolished in the coastal zone be replaced by an equivalent number of affordable units. Los Angeles Mayor Karen Bass [issued an executive order](#) in the wake of the Palisades and Eaton fires that exempted owners replacing housing destroyed by fire from complying with some permitting requirements under the Act. But the exemption only applies to properties where there is no change in the property's use or density. The order "establishes an accelerated process for homeowners to rebuild what they had before," said a spokesperson for the mayor, Clara Karger.

Adding to the confusion is uncertainty about whether the Federal Emergency Management Agency will play its traditional role of funding and coordinating recovery from the disaster. President Donald Trump and his billionaire ally Elon Musk have threatened mass firings at multiple federal agencies and froze their funds, in violation of Congress's Constitutional authority to appropriate money. ["FEMA should be terminated!"](#) Trump posted on Truth Social Tuesday, amid media reports that administration appointees had [fired the agency's chief financial officer](#) and defied a court order by [shutting down funding](#) for some disaster-related grants. The president has also [suggested he might withhold federal aid](#) unless California changes its voting laws.

Democratic state senators Friday proposed a state-run relief fund that would help families and individuals who were affected by the recent fires but unable to get federal aid. Allen said he and state Sens. Sasha Pérez and Aisha Wahab — Democrats representing Glendale and Fremont, respectively — plan to introduce a separate bill that would temporarily control rents

on mobile homes in the fire zone and strengthen mobile home owners' right to rebuild. The bill does not include any reconstruction funding specifically for mobile home parks.

Will government help?

Legislators could award extra funding to a state program that supports repair and replacement of mobile homes and parks, including those affected by a natural disaster. Lawmakers created the program, known as the [Manufactured Housing Opportunity and Revitalization Program](#), to help residents, non-profit groups and owners fix safety and health problems at aging parks. It gave out \$100 million over the past two years, but paused accepting applications in summer 2024. Low- and moderate-income Californians who are disaster victims can qualify for loans to replace their mobile homes through another state program, [CalHome](#).

A coalition of housing non-profits and community land trusts sent a letter to state lawmakers last month urging them to prioritize affordable housing as Los Angeles rebuilds.

“As we know, there is a growing threat of speculative real estate practices in the wake of climate-fueled disasters,” the letter read. It called on elected officials to use disaster relief funds to rebuild the two mobile home parks and preserve them as permanently affordable housing through a [community land trust](#), a non-profit that would retain ownership of the land while leasing or selling homes to residents.

While critics might question whether mobile home residents displaced by the fire should be automatically entitled to live on the coast, or whether public money would be better spent housing Californians who have even fewer resources, park residents had a simple answer: It's our home.

“That's what we all signed up for and put our life savings into: digs at the ocean,” said Greg Garber, a hardwood flooring contractor who said he paid \$150,000 in 1999 for a home he expected to leave to his children. Losing it, he said, was “like losing a loved one.”

Nationwide, nearly 80% of manufactured homes are located in areas at high risk of a wildfire, flood or other climate hazard, [a new Urban Institute report finds](#). More than a third of California's manufactured housing stock was built before 1976, the report estimates, meaning those homes are especially dilapidated and likely to be damaged in a disaster.

Some Los Angeles-area mobile home parks have converted to condominiums, said Sears, selling lots individually along with the homes atop them. It priced out those who couldn't afford the increased cost to buy in, he said.

Palisades Bowl itself almost went that route nearly 20 years ago. Biggs said his grandparents tried to subdivide and sell off the property after a landslide made some of the units uninhabitable. But a majority of residents opposed the move, he said, and the city blocked it. In a related court case, the California Supreme Court ruled that the conversion was subject to the Mello Act, meaning developers must replace any affordable housing that was lost.

Disasters drive inequality

Other California wildfires have wiped out local mobile home parks, one of the few remaining sources of affordable homeownership in the state.

Thirty mobile home parks housed more than 1,400 people in the Sierra foothills town of Paradise before the Camp Fire ravaged it in 2018. Of those, only about five have been rebuilt, said Seana O'Shaughnessy, who co-chairs a housing committee as part of the city's collaborative rebuilding effort.

"Every single mobile home park was grossly underinsured, so the ability for owners to build back was incredibly difficult," she said. "There had to be some source of public funding to make it happen."

The state's decision not to allow mobile home parks to qualify for disaster relief grants aimed at multifamily housing made it harder for park owners, she said. Many former mobile home residents left the state, she said, and some are still searching for permanent housing years later.

In Santa Rosa, the non-profit developer Burbank Housing replaced a 162-unit mobile home park with affordable apartments after the Tubbs Fire incinerated it, displacing the mostly elderly residents. Staff for the developer met with residents after the tragedy, helping them access recovery funds and surveying them about their needs, said Burbank Housing CEO Larry Florin. The 13-acre park was rezoned and divided into two parcels: one with market-rate apartments, and another with units guaranteed to be affordable for 55 years, paid for in part by federal low-income housing tax credits set aside for disaster relief. Rents are based on income and range from about \$700 to \$1,500 per month, slightly higher than the rates residents were paying at the park, Florin said.

Thirty-two of the park's original residents have moved into the new apartments, among other tenants.

"When neighborhoods are destroyed, they lose the social network that's binding them together because people spread to all ends of the earth," said Florin. "We very deliberately have tried to rebuild not just the homes but the community."

While disasters can occasionally lead to innovative projects like the Santa Rosa development, they [often increase inequality](#), studies have found.

As Los Angeles begins to recover from the Palisades and Eaton fires, the city council is weighing [whether to protect tenants from eviction](#) who have experienced hardship from the fires. California Attorney General Rob Bonta has filed charges against realtors accused of violating the state's ban on rental price gouging, and researchers are documenting the [disproportionate effect of the Eaton Fire on Altadena's Black residents](#).

Miller, the Palisades Bowl homeowner, hopes her neighborhood isn't forgotten. She wants to come back, and says many of her former neighbors do, too. The park was their only option to afford living in Pacific Palisades, she said.

"We're hoping they return it to its former glory," she said, "but better."

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Felicia Mello covers the state's economic divide, including such issues as affordable housing, labor rights and environmental and social justice.

State of California

GOVERNMENT CODE

Section 65590

65590. (a) In addition to the requirements of Article 10.6 (commencing with Section 65580), the provisions and requirements of this section shall apply within the coastal zone as defined and delineated in Division 20 (commencing with Section 30000) of the Public Resources Code. Each respective local government shall comply with the requirements of this section in that portion of its jurisdiction which is located within the coastal zone.

(b) The conversion or demolition of existing residential dwelling units occupied by persons and families of low or moderate income, as defined in Section 50093 of the Health and Safety Code, shall not be authorized unless provision has been made for the replacement of those dwelling units with units for persons and families of low or moderate income. Replacement dwelling units shall be located within the same city or county as the dwelling units proposed to be converted or demolished. The replacement dwelling units shall be located on the site of the converted or demolished structure or elsewhere within the coastal zone if feasible, or, if location on the site or elsewhere within the coastal zone is not feasible, they shall be located within three miles of the coastal zone. The replacement dwelling units shall be provided and available for use within three years from the date upon which work commenced on the conversion or demolition of the residential dwelling unit. In the event that an existing residential dwelling unit is occupied by more than one person or family, the provisions of this subdivision shall apply if at least one such person or family, excluding any dependents thereof, is of low or moderate income.

For purposes of this subdivision, a residential dwelling unit shall be deemed occupied by a person or family of low or moderate income if the person or family was evicted from that dwelling unit within one year prior to the filing of an application to convert or demolish the unit and if the eviction was for the purpose of avoiding the requirements of this subdivision. If a substantial number of persons or families of low or moderate income were evicted from a single residential development within one year prior to the filing of an application to convert or demolish that structure, the evictions shall be presumed to have been for the purpose of avoiding the requirements of this subdivision and the applicant for the conversion or demolition shall bear the burden of proving that the evictions were not for the purpose of avoiding the requirements of this subdivision.

The requirements of this subdivision for replacement dwelling units shall not apply to the following types of conversion or demolition unless the local government determines that replacement of all or any portion of the converted or demolished dwelling units is feasible, in which event replacement dwelling units shall be required:

(1) The conversion or demolition of a residential structure which contains less than three dwelling units, or, in the event that a proposed conversion or demolition involves more than one residential structure, the conversion or demolition of 10 or fewer dwelling units.

(2) The conversion or demolition of a residential structure for purposes of a nonresidential use which is either “coastal dependent,” as defined in Section 30101 of the Public Resources Code, or “coastal related,” as defined in Section 30101.3 of the Public Resources Code. However, the coastal-dependent or coastal-related use shall be consistent with the provisions of the land use plan portion of the local government’s local coastal program which has been certified as provided in Section 30512 of the Public Resources Code. Examples of coastal-dependent or coastal-related uses include, but are not limited to, visitor-serving commercial or recreational facilities, coastal-dependent industry, or boating or harbor facilities.

(3) The conversion or demolition of a residential structure located within the jurisdiction of a local government which has within the area encompassing the coastal zone, and three miles inland therefrom, less than 50 acres, in aggregate, of land which is vacant, privately owned and available for residential use.

(4) The conversion or demolition of a residential structure located within the jurisdiction of a local government which has established a procedure under which an applicant for conversion or demolition will pay an in-lieu fee into a program, the various provisions of which, in aggregate, will result in the replacement of the number of dwelling units which would otherwise have been required by this subdivision. As otherwise required by this subdivision, the replacement units shall, (i) be located within the coastal zone if feasible, or, if location within the coastal zone is not feasible, shall be located within three miles of the coastal zone, and (ii) shall be provided and available for use within three years from the date upon which work commenced on the conversion or demolition.

The requirements of this subdivision for replacement dwelling units shall not apply to the demolition of any residential structure which has been declared to be a public nuisance under the provisions of Division 13 (commencing with Section 17000) of the Health and Safety Code, or any local ordinance enacted pursuant to those provisions.

For purposes of this subdivision, no building, which conforms to the standards which were applicable at the time the building was constructed and which does not constitute a substandard building, as provided in Section 17920.3 of the Health and Safety Code, shall be deemed to be a public nuisance solely because the building does not conform to one or more of the current provisions of the Uniform Building Code as adopted within the jurisdiction for new construction.

(c) The conversion or demolition of any residential structure for purposes of a nonresidential use which is not “coastal dependent”, as defined in Section 30101 of the Public Resources Code, shall not be authorized unless the local government has first determined that a residential use is no longer feasible in that location. If a local government makes this determination and authorizes the conversion or demolition of the residential structure, it shall require replacement of any dwelling units occupied

by persons and families of low or moderate income pursuant to the applicable provisions of subdivision (b).

(d) New housing developments constructed within the coastal zone shall, where feasible, provide housing units for persons and families of low or moderate income, as defined in Section 50093 of the Health and Safety Code. Where it is not feasible to provide these housing units in a proposed new housing development, the local government shall require the developer to provide such housing, if feasible to do so, at another location within the same city or county, either within the coastal zone or within three miles thereof. In order to assist in providing new housing units, each local government shall offer density bonuses or other incentives, including, but not limited to, modification of zoning and subdivision requirements, accelerated processing of required applications, and the waiver of appropriate fees.

(e) Any determination of the “feasibility” of an action required to be taken by this section shall be reviewable pursuant to the provisions of Section 1094.5 of the Code of Civil Procedure.

(f) The housing provisions of any local coastal program prepared and certified pursuant to Division 20 (commencing with Section 30000) of the Public Resources Code prior to January 1, 1982, shall be deemed to satisfy all of the requirements of this section. Any change or alteration in those housing provisions made on or after January 1, 1982, shall be subject to all of the requirements of this section.

(g) As used in this section:

(1) “Conversion” means a change of a residential dwelling, including a mobilehome, as defined in Section 18008 of the Health and Safety Code, or a mobilehome lot in a mobilehome park, as defined in Section 18214 of the Health and Safety Code, or a residential hotel as defined in paragraph (1) of subdivision (b) of Section 50519 of the Health and Safety Code, to a condominium, cooperative, or similar form of ownership; or a change of a residential dwelling, including a mobilehome, or a mobilehome lot in a mobilehome park, or a residential hotel to a nonresidential use.

(2) “Demolition” means the demolition of a residential dwelling, including a mobilehome, as defined in Section 18008 of the Health and Safety Code, or a mobilehome lot in a mobilehome park, as defined in Section 18214 of the Health and Safety Code, or a residential hotel, as defined in paragraph (1) of subdivision (b) of Section 50519 of the Health and Safety Code, which has not been declared to be a public nuisance under Division 13 (commencing with Section 17000) of the Health and Safety Code or any local ordinance enacted pursuant to those provisions.

(3) “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technical factors.

(h) With respect to the requirements of Sections 65583 and 65584, compliance with the requirements of this section is not intended and shall not be construed as any of the following:

(1) A statutory interpretation or determination of the local government actions which may be necessary to comply with the requirements of those sections; except that compliance with this section shall be deemed to satisfy the requirements of

paragraph (2) of subdivision (c) of Section 65583 for that portion of a local government's jurisdiction which is located within the coastal zone.

(2) A limitation on the program components which may be included in a housing element, or a requirement that a housing element be amended in order to incorporate within it any specific provision of this section or related policies. Any revision of a housing element pursuant to Section 65588 shall, however, take into account any low- or moderate-income housing which has been provided or required pursuant to this section.

(3) Except as otherwise specifically required by this section, a requirement that a local government adopt individual ordinances or programs in order to implement the requirements of this section.

(i) No provision of this section shall be construed as increasing or decreasing the authority of a local government to enact ordinances or to take any other action to ensure the continued affordability of housing.

(j) Local governments may impose fees upon persons subject to the provisions of this section to offset administrative costs incurred in order to comply with the requirements of this section.

(k) This section establishes minimum requirements for housing within the coastal zone for persons and families of low or moderate income. It is not intended and shall not be construed as a limitation or constraint on the authority or ability of a local government, as may otherwise be provided by law, to require or provide low- or moderate-income housing within the coastal zone which is in addition to the requirements of this section.

(Amended by Stats. 1982, Ch. 1246, Sec. 1.)



Santa Cruz County Mobile and Manufactured Home Commission

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Santa Cruz, CA 95060
(831) 454-2772 Fax (831) 454-2411 TTY/TDD: 711
commissions@santacruzcountyca.gov
www.sccmmhc.org

Scheduled Meetings

Unless otherwise specified, regularly scheduled Mobile and Manufactured Home Commission meetings are generally held as follows:

DAY: Third (3rd) Thursday*
MONTH: Every other month (January, March, May, July, September, and November)
TIME: 11:30 AM –1:00 PM
LOCATION: United Way of Santa Cruz County Community Room*
4450 Capitola Road, Ste 106, Capitola, CA 95010

***Changes to the schedule**, including special meetings, changes of location/date, or meeting cancellations, **will be listed on the website** at www.sccmmhc.org as soon as the information becomes available. Agendas will be posted 72 hours in advance of each meeting.

2025 MEETING DATES		
DATE	TIME	LOCATION
January 16, 2025	11:30 AM –1:00 PM	United Way
March 20, 2025	11:30 AM –1:00 PM	United Way
May 15, 2025	11:30 AM –1:00 PM	United Way
July 17, 2025	11:30 AM –1:00 PM	United Way
September 18, 2025	11:30 AM –1:00 PM	United Way
November 20, 2025	11:30 AM –1:00 PM	United Way

Public Participation

- Please check the meeting agenda to learn details about how to participate in the commission meeting.
- If you need special accommodation, please call 454-2935 or TDD: 711 (California Relay Service) at least 48 hours before the meeting.