



July 11, 2016

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Mayor Denise Hoyt and City Council Members  
City of Yucaipa  
342772 Yucaipa Boulevard  
Yucaipa, CA 92399

Sent via Email

Re: Agenda Item 16 - Mobile Home Park Closure Ordinance

Dear Mayor Hoyt and City Council Members:

The City Council has clearly stated you are concerned about the conditions of some of the mobile home parks in Yucaipa. You have even identified 7 parks you want the park owner to consider closing and reused for a new and supposed better purpose. The City Council felt it wanted to evaluate a closure ordinance to supposedly facilitate the process, even though there is a State law process that has worked very successfully in the Southern California region on many occasions. MHET submits the proposed ordinance does just the opposite, and it will assure no park in Yucaipa will be closed regardless of the conditions.

MHET has over 30 years of experience working on mobile home issues, and has been deeply involved in park closure issues over that time. We are not aware of any park in the Inland Empire or Orange County that has been closed under an ordinance that contains a 25 mile restriction or a requirement for in-place value of the mobile home. NONE. Are you aware of any?

Park closure ordinances are created by cities to PREVENT closures. The 25 mile restriction and in-place value provision are the two most commonly used provisions used by cities drafting anti-closure ordinances. Yet, the proposed ordinance contains both of those provisions. Please explain how the use of these two provisions will make the park owners of the 7 parks you have identified more interested in considering their closure?

There are several other issues with the proposed ordinance, but what needs to be understood is this proposed closure ordinance does absolutely NOTHING to address the overall concern the City Council says exists; the declining conditions of some of the mobile home parks. Staff has indicated that unless things change "conditions may continue to deteriorate to the point that alternative housing becomes the ONLY VIABLE OPTION." (emphasis added) This closure ordinance will not alter that course.

The reports you receive and ordinances you approve (rent stabilization, park overlay zones, etc) say over and over and over they are "intended to promote the maintenance and viability of existing mobilehome parks". Has this objective been abandoned? I do not think so, and MHET submits there are other options to either continued deterioration of the parks or closure of parks. We submit it is time to conduct a thorough review of all the

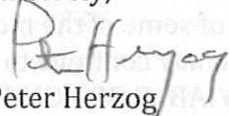
statutes, procedures, guidelines, whatever, related to the mobilehome community in Yucaipa all at one time to develop an actual solution to the real issue you have defined. The Biennial review exists, but it does not allow for the type of holistic discussion necessary to change the current course. This can't be done in silos and one provision at a time. The various provisions interact with each other. As provisions are changed, the impact on the other aspects of the massive mobilehome regulatory scheme in Yucaipa is never even discussed. Again, the result has not been what was hoped for, and to continue to do the same thing over and over is to assure the current declining course will continue.

Ten years ago, in 2006, a city retained expert provided a report that was made public, presented at a City Council meeting. That report pointed to "provisions within the Ordinance as a major cause for the deterioration and conditions observed in some mobile home parks." (emphasis added) The report went on to note provisions in the ordinance "are extremely prohibitive and ineffectual" (emphasis added) Nothing was done in response, not even any further analysis. Yet, what the expert stated has been proven to be correct as this City Council has designated 7 parks for potential reuse because your analysis led you to believe there were continually declining conditions in the parks that had gotten to the point something had to be done, even if it meant actually closing the parks completely.

Staff will tell you the 2006 report was not adopted by a past City Council, but that does not change or diminish the fact that an expert retained by the City advised the City of significant problems with the Ordinance which the last 10 years have proven to be true. Most of you were not on the City Council then, and you have made it clear that you believe some action must be taken to address the concerns you have identified, which was NOT the case 10 years ago. Regardless of what some past City Council may have done, you now have the opportunity to address the issues identified. Now is the time to do so.

MHET does respectfully request the proposed closure ordinance not be adopted as it actually will serve to undermine the goal the City Council has established, and will not serve to address the true issues facing the mobilehome residents and parks in Yucaipa. Additionally, we request the City Council direct staff to actually work with all the stakeholders to do a thorough analysis of the mobilehome park rent scheme to create resolutions to the issues.

Sincerely,



Peter Herzog  
Inland Empire Representative.