



Agenda Item C.1
DISCUSSION/ACTION ITEM
Meeting Date: December 16, 2025

TO: Mayor and Councilmembers

SUBMITTED BY: Peter T. Imhof, Director of Planning and Environmental Review

PREPARED BY: Lucy Graham, Senior Housing Analyst

SUBJECT: Report on University Mobilehome Park Activities and Consideration of City Council Options Regarding Such Actions

RECOMMENDATION:

Receive a report on University Mobilehome Park and provide direction to staff on future action items.

BACKGROUND:

University Mobilehome Park (Park) is one of five mobilehome parks in the City and it is the only mobilehome park that serves seniors (ages 55 and older). This past October, the Park was sold and, soon thereafter, Park mobilehome owners received a mailed notice, dated October 30, 2025, that the Park is now owned by the University Park Manufactured Housing Community, LLC, that it will be overseen by the management company Harmony Communities, Inc. (Harmony), and that the existing onsite manager will remain. The mailed notice contained a proposed new set of Park Rules and Regulations (including a change from a seniors aged 55+ mobilehome park, to an all-ages park), proposed an increase in space rent for residents, and scheduled a formal meet-and-confer session regarding that proposed rent hike for November 18, 2025. The proposed monthly increase in space rent was based, according to Park management, on “the allowable CPI increase pursuant to the City of Goleta Mobilehome Rent Control Ordinance” as calculated by Park management, plus an “additional rent increase in the amount of \$197.00 per space to recover increased operating costs since [2001]”. Shortly thereafter, the City was made aware that several residents who were renting mobilehomes in the park were issued a 60-day Notice of Termination of Tenancy.

Since then, City staff have had numerous interactions with park residents regarding the situation and the application of City’s existing Mobilehome Rent Control Ordinance under Goleta Municipal Code (GMC) Chapter 8.14. City staff has also attended several informational meetings onsite, including the meet-and-confer session held on November

18 by Park management. On that same date, the City Council heard general public comment from Park tenants at its regular City Council meeting.

The Golden State Manufactured-Home Owners League (GSMOL) is an organization that assists owners of manufactured homes with information and advocacy. Soon after University Mobilehome Park sold, GSMOL held an informational meeting with residents at the Park regarding resident rights and potential actions.

The City is aware of private resident actions undertaken with respect to the changes proposed at the Park. Specifically, City staff was notified that park residents were gathering homeowner signatures for support of a petition for hearing, as set out under Goleta Municipal Code Chapter 8.14. Chapter 8.14 sets forth a binding arbitration process to set the maximum rent increase for the year, when the proposed rent increase exceeds 75% of CPI¹. For a rent-increase notice that was issued on October 30, the petition for hearing needed to be submitted to the City by December 14. A representative on behalf of Park residents submitted a signed petition for hearing on December 10, prior to the deadline. Staff are processing the petition pursuant to Chapter 8.14 and associated rules for hearing.

To address situations similar to what is occurring in Goleta, jurisdictions throughout the State have considered or undertaken actions to minimize adverse impacts on residents of mobilehome parks, particularly senior residents, who may have limited fixed incomes and few housing alternatives available.

DISCUSSION:

Historically, mobilehome parks have been a source of unsubsidized affordable housing. There are five current mobilehome parks in the City, all of which are all-ages parks, except University Mobilehome Park, which is restricted to ages 55 and above.

Since assuming management of University Mobilehome Park, Harmony Communities, Inc. (Harmony) has moved swiftly to enact several changes in the Park, including raising space rents, a proposal changing the Park from seniors only to an all-ages community, and issuing eviction notices to some existing renters of mobilehomes in the Park. Harmony has sought to make similar changes to other mobilehome parks throughout the state, including recently a park in Orcutt in northern Santa Barbara County. The County of Santa Barbara responded to resident concerns by enacting a moratorium on the conversion of senior mobilehome parks to all-ages parks via an urgency ordinance, culminating in the County ultimately adopting a Senior Mobile Home Park Overlay in the County Code. Shortly after the County adopted its urgency ordinance moratorium, Harmony filed a lawsuit against the County alleging violations of federal and state law, and that lawsuit remains pending.

¹ Defined in Chapter 8.14 as “the percentage by which the most recently published edition of the United States Department of Labor, Bureau of Labor Statistics, Consumer Price Index for Urban Wage Earners and Clerical Workers, Los Angeles-Long Beach-Anaheim area, all items, Base Index 1967=100, shows that such index has increased during the immediately preceding 12 months for which said index has been published at the time notice of the increase was given or since the last rent increase.”

In consultation with the City Attorney's Office, City staff have conducted research and compiled a short list of actions and policy considerations being presented for City Council's consideration.

City staff is seeking Council direction on which of these potential actions, if any, staff should undertake or initiate.

Potential Action 1: Monitor Other Localities and/or Advocate for State Law Changes

As described in more detail below, there are a number of state statutory schemes that impact what the City may do locally with respect to mobilehome parks. City Council could direct staff to follow, support, and advocate for state legislation aimed at addressing the unique challenges facing mobilehome parks. Alternatively, the City Council could also appoint a standing committee or an ad hoc committee to look at these issues. The City Council may also direct City staff to monitor and work in concert with other localities either facing similar circumstances or otherwise undertaking revisions to the local mobilehome regulations.

Potential Action 2: Update GMC Chapter 8.14, Mobilehome Rent Control Ordinance, through City's Regular Ordinance Adoption Process

The City's Mobilehome Rent Control Ordinance was inherited from the County of Santa Barbara at the time of City incorporation. The City Council could consider minor or significant prospective changes to the City's existing local law.

The City has authority to adopt rent control for mobilehome parks so long as the ordinance is not in conflict with state laws, the California Constitution, or the U.S. Constitution. Rental ordinances applicable to mobilehome parks may be adopted under City's police power.

State law extensively regulates mobilehome occupancy and mobilehome parks. There are five statutory schemes that are presently in effect²; of those statutory schemes, the Mobilehome Residency Law ("MRL") regulates the landlord-tenant relationship between mobilehome park owners and park residents and does not expressly provide for statewide rent control for mobilehome parks.

Accordingly, the City may permissibly regulate mobilehome park rents locally; however, the MRL exempts certain mobile home spaces and leases from local rent control measures. That includes exemptions from rent control for: certain new construction; where the mobilehome is not the principal residence of the homeowner; or when the homeowner has rented the mobilehome to another party. Additionally, separate from local rent control, a local agency must allow the landlord to charge the tenant certain specified fees under state law.

²(1) Mobilehome Residency Law (Civil Code §§ 798 et seq.); (2) Mobilehome Residency Law Protection Act (Health and Safety Code §§ 18800 et seq.); (3) Manufactured Housing Act of 1980 (Health and Safety Code §§ 18000 et seq.); (4) Mobilehome Parks Act (Health and Safety Code §§ 18200 et seq.); and (5) Special Occupancy Parks Act (Health and Safety Code §§ 18860 et seq.).

Below are several categories of changes that the City could make to its existing ordinance, Chapter 8.14, that have been instituted in other jurisdictions. The range of alternatives could include more modest changes to the existing ordinance (immediately below), keeping the structure much the same, or more significant changes (see subsections (A) through (D), below).

Administrative Changes

The City could do away with language that distinguishes between homeowners that are on leases and those that are not, for purposes of who may be eligible to support a petition challenging a rent increase. The City could also consider providing for a mediation process as a voluntary alternative to arbitration. Furthermore, the responsibility of filing a rent-increase petition for hearing could be modified to put more onus on the Park owner.

Rent-Increase Changes

Chapter 8.14 allows for an automatic annual rent increase equal to 75% of CPI, which could be modified. Possible alternatives, that could be vetted consistent with federal and state law, include: a flat rate increase (e.g., up to 5%), a maximum allowable increase up to a different percentage of CPI (e.g., 100%), or a combination of these factors (e.g., a maximum annual increase limited to 60% of CPI or 5%, whichever is lower). Similarly, the limit on rent increases upon sale, which is currently 10%, could be altered.

Ordinance Updates

The City could provide clearer definitions and standards in the ordinance and associated rules for hearing. These updates would include outlining cost categories and time periods that could be considered or would be excluded from an arbitrator's evaluation of a rent increase. The rules for hearing could also be updated to include the designated roles of the involved parties and relevant fees, hourly rates, and interest rates.

Common Provisions of Local Mobilehome Rent Control Ordinances:

A. Base Rent Requirements

Many jurisdictions have a "base rent" provision in their mobilehome rent control ordinance that provides a starting point for the amount of rent that the mobilehome park owner can set for the mobilehome space plus future annual increases allowed under the ordinance. The City's Ordinance does not explicitly include a base rent concept, but instead relies upon either automatic annual percentage increases on space rents or upon an arbitration process following a petition by a majority of homeowners to set a "maximum rent schedule."

A base rent amount is typically pegged to a rent amount that was charged on a specific date, which is presumed to yield a fair return to the park owner. The rent amount is subject to increase when certain conditions are met or adjusted based on a consumer price increase. Ordinances that include a base rent provision typically also include a provision allowing the property owner to seek an increase in order to meet or obtain a "fair return." How the base rent is determined varies by jurisdiction. Usually, it is the space rent charged on the effective date of the ordinance or, for spaces subject to long-term leases, the space rent charged under the lease. In jurisdictions with vacancy control provisions

in their ordinances, the base rent either remains the same or changes by a specified allowed amount (e.g., the previous space rent plus up to 10%) upon vacancy.

B. Vacancy Control or Vacancy Decontrol Provision

Unlike the provisions of the Costa-Hawkins Rental Housing Act, which restricts vacancy control in rental housing and provides that the landlord of multifamily housing has the right to rent a vacant unit at any price, state law governing mobilehome parks and recreational vehicle parks provides no such restriction. As a result, many jurisdictions have enacted some form of “vacancy control” in their local ordinances. These provisions act as further control on when mobilehome park owners can increase the rent for a mobilehome space by dictating the specific circumstances when a park owner can or cannot establish a new base rent or when a park owner can increase rent.

C. Rent Increase Application and Review Procedures

Local ordinances often include rent increase and review procedures for how rent increases have to be completed and filed, and how the City will review completed applications.

Typically, such procedures generally require the park owner to file a rent increase application with the City within set time frames (usually not more than annually, or within a set period following completion of capital improvements). Once the rent increase application has been received, the City would review the application, hold a hearing, and make a decision to approve or disapprove within a specified time frame. If an adverse decision has been made, some cities deem the decision final, while others permit the park owner and/or operator to appeal. In general, providing for an appeal process means that park owners and/or operators are required to exhaust available administrative remedies before filing a lawsuit.

D. Administration of Ordinance: Staff and Public Board

One of the key decisions in drafting rent control measures involves the administration of the local regulations.

Many jurisdictions designate a member or multiple members of the city staff as the responsible individual(s) administering and enforcing the mobilehome rent control ordinance. Other jurisdictions have an appointed board or commission responsible for the administration of local rent control regulations. The designated functions of such boards vary widely:

- The City of Rohnert Park’s Rent Appeals Board is responsible for setting the rent ceiling for all controlled rental spaces. It also has the power to require registration of all controlled rental spaces; to conduct studies, investigations, hearings, and any other necessary functions; to promulgate rules and regulations; and to settle civil claims and seek injunctive relief. The Rent Appeals Board may use city staff to administer and enforce the mobile home rent control ordinance.

- The City of Fresno has a robust rent control board system that is composed of a Resident's Committee ("Committee") and a Mobilehome Part Rent Review and Stabilization Commission ("Commission"). The Committee, which is comprised of mobile home park residents, is the first step in the rent increase process and is empowered to review applications for rent increases. After the Committee acts, the Commission, which consists of a mix of mobilehome park owners, mobilehome park residents, and individuals that are neither park owners nor mobilehome residents, will hold a hearing on the rent increase application.
- The City of Beaumont's Administrative Appeals Board is responsible for reviewing and adjudicating rental increase requests that exceed the annual maximum permissive CPI adjustment.
- The City of Carson's Mobilehome Park Rental Review Board is responsible for hearing and adjudicating rent adjustment applications submitted on the basis of capital improvement expenditures and/or for an adjustment to assure the park owner a "fair return" and to make any recommendation to the Carson City Council for the implementation and enforcement of the ordinance.

In general, cities with public boards still require some staff assistance to conduct hearings, and frequently staff are responsible for enforcement of regulations with the public board responsible for adjudication of disputes. A board structure helps insulate decision making from political or staffing constraints. By contrast, staff only administration may be more efficient but has the potential to reduce independence through checks and balances.

Potential Action 3: Study Feasibility of an Urgency Ordinance Moratorium and/or Senior Mobilehome Park Overlay, Return to City Council with Accompanying Materials

Should it be the direction of the City Council, City staff and the City Attorney's Office could evaluate the feasibility of an urgency ordinance moratorium and/or senior mobilehome park overlay zone. There have been actions initiated by County of Santa Barbara, City of Thousand Oaks, and other jurisdictions where the initiation of zoning changes, initially via urgency ordinance, sought to preserve existing senior mobilehome housing. Such action could address the proposed transition of a mobilehome park from seniors only to all ages.

If the City directed City staff and the City Attorney's Office to further consider an urgency ordinance, and the policy and legal considerations that would result, City staff would seek to move quickly to return to the City Council. As noted above, the notices that were sent out to University Mobilehome Park homeowners, which included the proposed rule change to transition the park from seniors to all ages, were issued on October 30, 2025. Under the Mobilehome Park Residency Law, following a required meeting and consultation with homeowners that the City understands occurred on November 14, 2025, amendments to University's park rules and regulations may be implemented immediately by consenting homeowners, but not less than six months following issued notice for nonconsenting homeowners. (Civil Code § 798.25(b).)

If the City Council directed staff to prepare an urgency ordinance, the Council would ultimately need to find the urgency ordinance was necessary for the immediate preservation of the public peace, health or safety, and its adoption would require a four-fifths affirmative vote of the Council. An urgency ordinance can be made effective immediately after adoption.

It should be noted, there are distinguishing facts that make Goleta different from the County of Santa Barbara and the City of Thousand Oaks, including existing local regulations. Should the City Council direct City staff and the City Attorney's Office to pursue this Potential Action No. 3, staff would request authorization to investigate the demographics at the Park, and determine an appropriate approach, to be presented to the City Council, that would meet the goals and policies of Goleta.

A. County of Santa Barbara

In response to public comment related to the purchase by Harmony, Inc. of the Del Cielo park in Orcutt, the Santa Barbara County Board of Supervisors adopted an urgency ordinance moratorium on November 5, 2024, prohibiting the conversion of 11 County senior mobile home parks to all-ages parks. The County found that the conversion of those parks to all ages would unduly burden and irreparably harm senior citizens. As articulated in the Board agenda materials, the moratorium sought to preserve a senior-only restriction while allowing the County time to develop permanent zoning regulations, which ultimately resulted in the County's establishment of a Senior Mobile Home Park Overlay. As stated above, Harmony filed a lawsuit against the County shortly after the urgency ordinance moratorium was adopted.

On July 15, 2025, the County adopted its Senior Mobile Home Park Overlay Ordinance Amendments, which created the Senior Mobile Home Park Overlay, and Mobile Home Park overlay zone. As articulated in the Board agenda materials from that time, the two new zoning overlays for mobile home parks apply to a combined 19 mobile homes (11 of which were designated for seniors), with the stated goal to "preserve existing mobile home parks and to prevent the conversion of senior mobile home parks to all-ages mobile home parks."³

Specific to its Senior Mobile Home Park Overlay, the County required that parks within that overlay include at least 80 percent of the occupied spaces or lots to be rented or leased to senior citizens ages 55 years or older, for use as their primary residence. Separately, the Mobile Home Park Overlay ensured the continued use of mobile homes (and manufactured homes) throughout the County remain an accessible housing option for all households. The County's ordinance amendments include signage and advertising requirements, and requirements placed on rental agreements and leases for mobilehome parks within the respective overlays to ensure the County's goals were met and followed.

³ <https://santabarbara.legistar.com/LegislationDetail.aspx?ID=7455850&GUID=9BCC41F7-F930-405A-B373-B492561B29EE>.

B. City of Thousand Oaks

In September 2023, the City of Thousand Oaks adopted an urgency ordinance that established a Senior Mobile Home Park Overlay and related regulations on an urgency basis. The urgency ordinance predated a permanent overlay zone change and was associated with five historically seniors-only mobilehome parks in the city limits. Thousand Oaks' action is described within its agenda materials as having been in response to concerns from homeowners at a city mobilehome park, where the City received information the park owner intended to start leasing spaces to all ages. Similar to the County of Santa Barbara, the senior overlay in Thousand Oaks required reservation of at least 80% of spaces or lots to persons 55 years or older.

Thousand Oaks also set up a series of age verification and required compliance procedures for impacted parks within the overlay. Such codified changes include the City's oversight in ensuring owners confirm at least every two years that the parks are following the age restrictions within the overlay and a duty to comply with age verification and document requests made by the city to ensure compliance.

GOLETA STRATEGIC PLAN:

City-Wide Initiative: 4 Support Economic Vitality

Strategic Goal: 4.7 Support organizations, programs, and policies that facilitate affordable housing for the Goleta workforce

FISCAL IMPACTS:

The fiscal impacts depend on the direction provided by the City Council. All options will require staff time and support from the City Attorney's Office, which can be accommodated within existing workloads initially, but may require reprioritization or supplemental appropriations if the Council directs substantial ordinance amendments or program development.

Updating Chapter 8.14 or establishing new administrative procedures, monitoring requirements, or a review board would likely require ongoing staff and legal support, and may result in increased operating costs that would need to be further evaluated and brought back to the Council with specific budget recommendations.

If the Council directs staff to evaluate or pursue an urgency ordinance moratorium or a Senior Mobilehome Park Overlay (Potential Action No. 3), additional fiscal impacts may occur, should the City be sued by the Harmony Communities, Inc. or a subsidiary or affiliate, similar to the lawsuit filed against the County of Santa Barbara. Any such costs would be assessed and presented to the Council if and when they become foreseeable.

ALTERNATIVES:

Delaying either policy decision may temporarily delay the implementation of any response efforts to what is occurring or may occur to mobilehome parks in the City, now and in the future.

LEGAL REVIEW BY: Isaac Rosen, City Attorney

APPROVED BY: Robert Nisbet, City Manager