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**From:** Saulo Londono <>  
**Sent:** Sunday, January 26, 2025 9:56 PM  
**To:** , City Clerk  
**Cc:** Kamei, Ellen; Ramos, Emily Ann; Hicks, Alison; McAlister, John; Ramirez, Lucas; Showalter, Pat; Clark, Chris  
**Subject:** Regarding Agenda Item 7.1 - Mobile Home Rent Stabilization  
**Attachments:** WMA - Mountain View Letter.docx; WMA Mountain View Letter.pdf

**CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.**

Esteemed Councilmembers,

I write today as a representative for WMA; the Western Manufactured Housing Communities Association. We work with mobilehome parkowners and managers in California, doing advocacy, training, education, etc.

As a result of our work, our association has access to a database of information relevant to this discussion. We believe that communication and collaboration between cities and their housing providers, our members, is as important as ever as affordable housing is and will remain a top priority for every city in California for many years to come.

In the spirit of collaboration, we think it's imperative for you to have the most accurate information when making important decisions for your community. With that said, we believe you've been poorly served by the staff report provided to you. The summary of AGA, floor, and ceiling combinations that staff has prepared for you contains several glaring mistakes, severely impacting the calculations and the conclusions provided to you in the staff report. I am providing you with a lengthy list of mistakes found in your staff summary, along with all supporting links at the bottom of this document:

- **Daly City** does not have an ordinance with a 5% cap. The city does not have a rent control ordinance at all; it has a rent review commission. This mistake amounts to 501 spaces.
- The **County of Napa** does not have a mobilehome rent control ordinance at all but your staff summary says they do. This mistake amounts to 3,661 spaces.
- The **County of Contra Costa** does not have an ordinance with 60% of CPI without a floor and a 3% cap. They have an ordinance with 75% of CPI with a 2% floor and a 6% cap. Also your data indicates that there are zero mobile home spaces in Contra Costa County. The actual number, and what this mistake amounts to, is 2,913 spaces.
- The **City of Concord** does not have an ordinance with 60% of CPI with a 3% cap. They have an ordinance with 80% of CPI with a 5% cap. This mistake amounts to 1,412 spaces.
- The **City of Antioch** does not have rent control for mobile homes located in mobile home parks. They are directly exempted from the city's ordinance, but your staff summary says otherwise. This mistake amounts to 3,718 spaces.
- The **County of Alameda** does not have an ordinance with 70% of CPI. They have an ordinance with 100% of CPI. This mistake amounts to 710 spaces.

- The **City of Fremont** has an ordinance with a 3% floor, but your summary says the ordinance includes no floor. This mistake amounts to 732 spaces.
- The **City of Rohnert Park** does not have an ordinance with 75% of CPI. They have an ordinance with 99.5% of CPI. This mistake amounts to 1,316 spaces.

The combination of all these grievous mistakes amounts to a total of **14,963 spaces that have been calculated in error**. This amounts to **33% of the entire universe** of 45,194 spaces that city staff has analyzed, calling into question all subsequent conclusions. Tables 1, 2, and 3 of your staff report all either have wrong numbers or are missing information. These are the tables and figures that your staff has used in their calculations in order to compare the City of Mountain View to its regional peers.

It should be noted that all of these errors lean in the same direction: towards making other ordinances look stricter and Mountain View's look more lenient. As a result, city staff have made recommendations to you that are not in line with a real interpretation of the situation.

In fact, once the real numbers have been entered, these are the actual conclusions that can be drawn by comparing Mountain View to regional peers:

- Mountain View's AGA of 100% of CPI is within the range of the CPIs used in comparable jurisdictions. **100% of CPI is the subsection with the most number of jurisdictions, making it the most common level of AGA used throughout the region.**
- Mountain View's **floor of 2% falls squarely in the middle of the range of floors used in comparable jurisdictions.** (Staff analysis that says your city is the only jurisdiction with a floor of 2% is false)
- Mountain View's **ceiling of 5% falls at the very bottom of the range of ceilings used in comparable jurisdictions.** Over 75% of jurisdictions have a ceiling of 5% or above.

I trust that as representatives of your constituents, you do not want to make important decisions about your community based on false information. We are pleased to provide the city with this data so you can make better, more informed decisions.

Lastly, I'd like to make a plea: Mobilehome parks are essentially small little cities; parkowners and community managers deal with many of the same challenges that you do when governing the operations of your city. Please keep this fact in mind as you make decisions which will impact the well-being of your community for decades to come.

#### **SUPPORTING LINKS:**

Daly City: [Chapter 2.52 - MOBILE HOME RENT REVIEW COMMISSION | Code of Ordinances | Daly City, CA | Municode Library](#)

Contra Costa County: [Division 540 - MOBILEHOME PARKS | Ordinance Code | Contra Costa County, CA | Municode Library](#)

City of Concord: [Chapter 15.105 MOBILE HOME PARKS](#)

City of Antioch: [§ 11-3.08 EXEMPTIONS](#)

Alameda County: [Chapter 3.32 - MOBILEHOME PARK RENT REVIEW PROCEDURES | Code of Ordinances | Alameda County, CA | Municode Library](#)

City of Fremont: [Chapter 9.55 MOBILE HOME SPACE RENT STABILIZATION](#)

City of Rohnert Park: [ARTICLE VI. - CONSUMER PROTECTION | Code of Ordinances | Rohnert Park, CA | Municode Library](#)

Sincerely,



**Saulo Londoño**

**Regional Representative — Northern California/Bay Area**

**Western Manufactured Housing Communities Association**

2295 Gateway Oaks Drive, Suite 240, Sacramento CA 95833

[email](#) | [map](#) | [wma.org](#)

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Sincerely,

Saulo Londono  
Regional Representative  
Western Manufactured Housing Communities Association (WMA)

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**From:** Janet Werkman  
**Sent:** Monday, January 27, 2025 12:48 PM  
**To:** Kamei, Ellen; Ramos, Emily Ann; Showalter, Pat; Hicks, Alison; Ramirez, Lucas; Clark, Chris; McAlister, John; City Council; Wayne.Chen@mountainview.go  
**Subject:** Subject: Support for a Lower AGA for Mountain View Mobile Homes

**CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.**

January 27, 2025

Subject: Support for a Lower Annual General Adjustment for Mountain View Mobile Homes

Dear Mountain View City Council Members,

Mountain View Housing Justice appreciates that Council chose review of the Annual General Adjustment (AGA) for mobile homes as a housing element policy.

We urge you to promote housing affordability and reduce displacement risk by amending the Mobile Home Rent Stabilization Ordinance to lower the AGA for mobile homes from 100% of CPI to 60% of CPI and to eliminate the 2% floor for rent increases.

Lowering the Mobile Home AGA is beneficial to Mountain View:

- Mobile homes offer the most affordable option for home ownership, including both long-time residents and new buyers
- Mountain View residents and new buyers. Lower rent increases will allow residents to stay in their homes and their Mountain View
- community. Long-time residents will not be forced to sell their homes due to rising space rents.

Lowering the AGA is fair, reasonable and low risk:

- The delay from 2016 when the CSFRA went into effect until the MHRSO was enacted in 2021 allowed high rent increases for mobile home residents. Mountain View's higher rent baseline should not be magnified by AGA increases.
- It is more expensive to live in a mobile home in Mountain View than in other jurisdictions. Council can ease this situation with a more moderate AGA.
- Mobile home owners have a substantial investment in their homes and face serious financial consequences when rising rents force them to move. They also bear the cost of repair and maintenance of their homes in addition to space rent. Many jurisdictions have chosen an AGA that is less than CPI to account for the financial burdens of mobile home ownership.
- While staff is proposing a lower AGA, staff is not proposing any change to the MNOI calculation. The park owners will remain entitled to CPI level growth in their net income. They will have the option to file a petition for higher space rents if their financial results are not meeting this standard.
- The CSFRA and the MHRSO already each have their own set of regulations and procedures. We are confident staff will confirm that having different AGA's for the CSFRA and the MHRSO will not pose any administrative burden.

Thank you for your consideration. We hope you will take this step towards greater housing affordability, and lower risk of resident displacement.

Sincerely,  
Janet Werkman, on behalf of Mountain View Housing Justice