



BOARD OF SUPERVISORS
AGENDA LETTER

Clerk of the Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101
(805) 568-2240

Agenda Number:

Submitted on:
(COB Stamp)

Department Name: Planning and Development
Department No.: 53
For Agenda Of: October 8, 2024
Placement: Department
Estimated Time: 45 minutes
Continued Item: N/A
If Yes, date from:
Vote Required: Majority

TO: Board of Supervisors
FROM: Department Director(s) Lisa Plowman, Director of Planning & Development
Contact Info: Lisa Plowman, 568-2086
SUBJECT: Discussion of Mobile Home Parks and Potential Overlays

County Counsel Concurrence

As to form:

Other Concurrence:

As to form: N/A

Auditor-Controller Concurrence

As to form: N/A

Recommended Actions:

That the Board of Supervisors:

- a. Receive and file this report on existing mobile home parks in the County of Santa Barbara
- b. Determine that this report does not constitute a project under the California Environmental Quality Act (CEQA), pursuant to CEQA guidelines Section 15378(b)(5); and
- c. Provide direction to staff, as appropriate.
 - i. Direct staff to further investigate the feasibility of a moratorium and return to the Board for further direction;
 - ii. Monitor potential conversions and include a Senior Mobilehome Park Overlay in the fiscal year 25-26 Long Range Planning Work Program
 - iii. Direct Long Range Planning staff to continue to pause work on a short-term rental ordinance fiscal year 25-26 and initiate an ordinance to create a Mobile Home Park Overlay or another instrument that:
 1. Prevents redevelopment of mobile home parks; and/or
 2. Restricts conversion of senior mobile home parks to all age parks, clarifying if a senior overlay should only apply to mobile home parks currently restricted to seniors.

Summary Text:

During the Board of Supervisors hearing on August 20th, the Board of Supervisors directed staff to return with a discussion on the status of mobile home parks in the County, particularly with respect to potential changes to age requirements.

Background:

During general public comment at the August 20, 2024 and September 17, 2024 Board hearings residents of the San Vicente and Rancho Santa Barbara mobile home parks in Santa Barbara and the Del Cielo mobile home park in Orcutt spoke about the proposed conversion of the Del Cielo park and the potential conversion of the Santa Barbara parks from seniors only (55 years or older) to all age parks. The residents of the mobile home parks have asked the Board to pursue a moratorium to prevent conversions until such time an overlay could be developed to preserve the existing senior only restrictions.

1. Existing Mobile Home Parks in SB County

There are 24 mobile home parks in the unincorporated areas of the County of Santa Barbara that have permits to operate from the State of California Housing and Community and Development Agency. Three of these mobile home parks operate as campgrounds and do not provide for permanent residency. Therefore, there are only 21 mobile home parks that provide for permanent residency. These mobile home parks are inspected by the Planning and Development Building and Safety Division pursuant to Chapter 11 Mobile Homes and in accordance with the States Mobile Home Park Act. A list of the existing parks, their location, age restriction and number of spaces is provided below.

Park Name	Location	Age Rstrct.	# of Spaces	Zoning
Knollwood Village	Orcutt	55+	195	MHP
San Vicente	Santa Barbara	55+	270	MHP
Sunny Hills	Orcutt	55+	166	MHP
Town & Country	Orcutt	55+	186	MHP
Rancho Santa Barbara	Santa Barbara	55+	334	MHP
Orcutt Ranch Estates	Orcutt	55+	229	MHP
La Cumbre	Santa Barbara	55+	74	DR-12.3
Rancho Oneonta	Santa Ynez	55+	15	AG-I-10
Quail Meadows East	Orcutt	55+	191	MHP
New Cuyama Trailer Park	New Cuyama	55+	17	AG-II-100
Del Cielo	Orcutt	55+, proposed change to all ages	185	MHP
Rancho Jamore	Los Alamos	None	32	MHP
Rancho Los Alamos	Los Alamos	None	48	MHP
Poppy Motail & Trailer Park	Santa Barbara	None	12	MU
Orcutt Trailer Park	Santa Maria	None	6	OT-R-14/GC
Valley Gardens	Solvang	None	42	MHP
Frontier Village	Los Alamos	None	26	MHP
Saint Marie	Santa Maria	None	80	C-S
Blue Skies	Santa Barbara	None	105	MHP

Park Name	Location	Age Rstrct.	# of Spaces	Zoning
Summerland by the Sea	Summerland	None	38	MHP
Nomad Village	Santa Barbara	None	150	MHP

Research into the occupancy of the existing mobile home parks found that there are 11 mobile home parks that have a 55+ age restriction on the occupancy, as shown above. The remaining mobile home parks were found to not have any age restrictions for occupancy. There are approximately 1,862 spaces available with a 55+ age restriction out of the approximate total of 2,401 available spaces throughout the existing mobile home parks in the unincorporated areas of the County.

In addition, a search of Planning and Development's records for the existing mobile home parks found that there were no age restrictions placed as a condition on nearly all of County permits related to these mobile home parks. Based on the research conducted it appears that the 55+ age restrictions for the 11 mobile home parks are set by the owner/operator of the mobile home parks and not by County permits or regulations.

As noted above, one of the 11 age restricted mobile home parks is in the process of converting the mobile home park from a 55+ age restriction occupancy to general occupancy. This mobile home park is known as Del Cielo and is located at 3210 Santa Maria Way in the community of Orcutt. Previously, Del Cielo has had an age restriction for the occupancy of the residents living in the mobile home park, which has been the minimum age requirement of 55 years old for the primary resident.

2. Mobile Home Park Regulations

2.1 California State Law

Mobile home parks are governed by California Law, known as "Mobilehome Parks Act" Section, Part 2.1 of the California Health and Safety Code, commencing with section 18200. These laws establish requirements for the permits, fees, and responsibilities of park operators and enforcement agencies, including the Department of Housing and Community Development.

In addition, the rights and obligations of mobile home park homeowners, tenants and management may be found in summary in the Mobilehome Residency Law Handbook.

More information on these laws may be found online at [Mobilehome Parks | California Department of Housing and Community Development](#)

The following information is located in the Mobilehome Residency Law Handbook:

Senior residents who have leases that provide that the park is a "retirement" or "senior" park and provide for specific facilities may have a case against diminution of services agreed upon in the lease or rental agreement. The federal Fair Housing Amendments Act of 1988 prohibits discrimination against families with children in multiple residential housing but permits such housing, including mobile home parks, to limit residency to seniors in one of two categories: 1) 55 and older, or 2) 62 and older, if the park meets certain minimum conditions. The major condition is that a minimum of 80% of the units are required to have at least one resident who is of age 55 or older. Federal law does not specifically address procedures for changing from a senior-only category to an all-age category, which in rental mobile home parks under state law or by practice is often the sole decision of park management with a minimum notice. However, parks can lose their "senior" status if, upon a complaint, they fail to meet the statutory conditions, such as the 80% requirement.

2.2 Age Restriction Ordinance Research

A review of the following counties was conducted to identify if there were any existing ordinances that addressed the use of age restrictions on mobile home park's occupancy:

- Ventura County
- San Luis Obispo County
- Marin County
- Monterey County
- Santa Cruz County
- Santa Clara County
- Los Angeles County
- San Diego County

The research found that Ventura County is the only one with an existing ordinance related to placing an age restriction on mobile home park occupancy:

2.3 Ventura County – Mobilehome Park Overlay Zone and Senior Mobilehome Park Overlay Zone

On December 10, 2019, the Ventura County Board of Supervisors adopted two non-coastal zoning ordinances to establish mobile home park and senior mobile home park overlay zones and related regulations for existing mobile home parks in the unincorporated areas of Ventura County. These overlays are designed to protect mobile home parks from redevelopment to another use and to protect senior mobile home parks from conversion to an all age park.

These overlay zones are described as follows (see: [Mobilehome Park and Senior Mobilehome Park Overlay Zones \(vcrma.org\)](http://vcrma.org))

- The Mobilehome Park Overlay Zone prevents the redevelopment of mobile home parks. Only land uses related to the operation of mobile home parks are allowed in the Mobilehome Park Overlay Zone. All of the unincorporated county's mobile home parks are in the Mobilehome Park Overlay Zone in Ventura.
- The Senior Mobilehome Park Overlay Zone is applied solely to Ventura County's eight senior mobile home parks. At least 80% of the spaces in these parks must be occupied by at least one resident 55 years of age or older. Senior mobile home park owners or management may apply additional occupancy restrictions.

Please note that the County could rezone all sites to Mobile Home Park in order to prevent redevelopment of the parks. Currently, there five sites that are not zoned Mobile Home Park. Either approach, an overlay or a rezone, would protect the parks from conversion unless the County subsequently approves an ordinance amendment to convert the park to another use.

Additional information on the Ventura County ordinances can be found on their website at [Mobilehome Park and Senior Mobilehome Park Overlay Zones \(vcrma.org\)](http://vcrma.org)

2.4 Existing Santa Barbara County Regulations

The Santa Barbara County Code currently includes Chapter 11A Mobilehome Rent Control which provides for rent control for mobile homes. This chapter was adopted by the Board of Supervisors on October 22, 1979. The intent of this chapter was to "protect the owners and occupiers of mobile homes from unreasonable rents while at the same time recognizing the need for mobile home park owner to

receive a fair return on their investment and rent increases sufficient to cover their increased costs.” This chapter addresses rent and increases in rent and does not have any provisions related to age restrictions on occupancy of the mobile home park.

3. Moratorium

As noted above, the residents of the Del Cielo mobile home park in Orcutt are concerned about the pending conversion of the park from senior only to all age and the residents of the San Vicente and Rancho Santa Barbara mobile home parks are concerned about the potential conversion of these parks. The residents recently attended the August 20th and September 17th Board hearings and requested that the Board enact a moratorium to protect existing senior only parks until such time as an overlay can be developed. Moratoriums can be enacted when the following findings can be made:

- Public health, safety, or welfare: There is a current and immediate threat to the public health, safety, or welfare
- Zoning ordinance: Approving additional entitlements under the zoning ordinance would result in the threat to public health, safety, or welfare

Please be advised that the conversion of a senior mobile home park to an all age park does not require a change in an entitlement under the zoning ordinance. Additionally, the adoption of a moratorium requires a 4/5 vote of by the Board.

4. Potential Next Steps

The Board could take one or more of the following steps:

- a. Direct staff to further investigate the feasibility of a moratorium and return to the Board for further direction;
- b. Continue to monitor potential conversions and provide direction to staff to include adoption of a Senior Mobilehome Park Overlay in the fiscal year 25-26 Long Range Planning Work Program when it returns for Board consideration;
- c. Direct Long Range Planning staff to continue to pause work on a short-term rental ordinance in the coastal zone until fiscal year 25-26 in order to create capacity to initiate an ordinance to create a program similar to the County of Ventura that includes:
 - i. Mobilehome Park Overlay or similar instrument that would prevent redevelopment of mobile home parks; and/or
 - ii. Senior Mobilehome Park Overlay to restrict conversion to all age parks; clarifying if a senior overlay should be limited to mobile home parks currently restricted to seniors.

Fiscal and Facilities Impacts:

Work on a Mobilehome Park Overlay is not currently included in the Long Range Planning Work Program for this fiscal year. During hearings on the work program, the Board directed the Department to delay work on the planned short-term rental ordinance in the coastal zone so there would be available resources for the current amendment to the Cannabis ordinance. This is scheduled to be heard by the Board on November 4, 2024. The Board could direct staff to further delay the short-term rental ordinance until fiscal year 2025-26 thereby creating capacity in the current work program to initiate a Mobilehome Park Overlay.

Special Instructions:

None.

Attachments:

N/A