



May 26, 2017

Ms. Brenda Rojas, Program Administrator
City of Escondido
Housing and Neighborhood Services Division
201 North Broadway
Escondido, CA 92025

RE: *Proposed amendment to Section 12.H of the Mobilehome Rent Review Board Guidelines applicable to short-form rent increase applications*

Dear Ms. Rojas,

Thank you for the opportunity to provide feedback on the proposed changes to the City of Escondido's Short Form Guidelines for Mobilehome Rent Review Board. We appreciate the opportunity to participate.

WMA represents mobilehome parkowners throughout California. While we represent many mobilehome parkowners in Escondido, WMA does not purport to represent all voices on this matter. Certainly, you will have varying opinions of the proposed changes due to the varying effects these changes will have on each park's operations.

The history of the relationship between mobilehome parkowners, residents and the city is long and at times very distributive. It is the parkowner's desire to keep litigation, contentious rent hearings and an overall adversarial relationship in our collective rearview mirrors. The introduction of the short form has been part of the solution to normalize the relationship between all stakeholders. In fact, Escondido should be seen as a model for other cities that wish to limit litigation between the city and parkowners.

Regarding the short form, it is essential to recognize the City of Escondido has put in place an extraordinarily high standard that requires parkowners to have a hearing for an annual increase. In my review of California's ordinances, very few ordinances require such a burden for a sub-inflationary increase. Most rent-controlled jurisdictions permit an automatic increase tied to the CPI, without the hassle or expense of a hearing. In fact, just last week, the City of Carson—well known for its stringent rent control ordinance—eliminated the hearing process. It now allows for an increase of 75% of the CPI. This is part of an effort to reduce costs to the city by half a million dollars a year. Carson's ordinance isn't Escondido's ordinance and Escondido may not have the ability to permit automatic increases. Throughout the years, much thought,

discussion and negotiation has gone into the short form process and it should be preserved in its original form.

The majority of the mobilehome parkowners I spoke to are not completely opposed to the city's response to the Grand Jury. They recognize that to some outsiders looking at the short form process without any context (at this point, no explanation or description of the communication between the Grand Jury and the city has been publically shared with the stakeholders), it *could* be difficult for *some* residents to attend a hearing at city hall.

General Objections:

- 1) The primary objection to the amendment is that it applies to all seniors. Under the proposed language, all seniors are subject to the exemption. Having it apply to all seniors puts senior mobilehome park owners at a significant disadvantage when seeking increases. Certainly, it is not a hardship for all seniors to attend the hearing. Our communities are filled with active seniors who get around town daily without any trouble and it is a fallacy to suggest that all seniors have mobility hardships.

This exemption should apply to people with disabilities only. This would include seniors with mobility issues and we believe those are the residents that the city would be attempting to accommodate with their proposed changes.

- 2) Parkowners are very concerned about the lack of vetting in the proposed changes. It is ripe for abuse. Experience tells us that organizers will collect completed forms from all eligible homeowners using collection tactics that pit homeowners against parkowners.

Another solution would be to **allow these affidavits to be signed and witnessed by the city employee who is conducting the required pre-hearing meeting at the mobilehome park.** This will allow disabled homeowners to participate in a protest against the increase in person at the park, under the watchful eye of the city. We think this process offers more oversight while at the same time offers the residents with disabilities an opportunity to formally register their dissent.

Taxi Vouchers. The City of Escondido's Senior Services has a program that allows seniors to apply for taxi vouchers for various appointments. The City Council could expand that program to include mobilehome rent review hearings as well.

Technical Objections

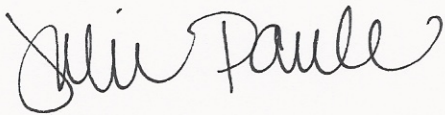
Parkowners had questions about the following terms:

- Use of "Senior." How do you define this term? Aged 55 and over? Aged 62 and over? Aged 65 and over?

- “Resident.” Using “effected homeowner” instead would limit the ability to protest to only the resident who owns the home. Otherwise, a visiting guest could protest the increase.

Thank you for the opportunity to participate in this review process. We hope that working together and listening to all the stakeholders’ concerns about the short form will produce a better outcome for the city.

Sincerely,

A handwritten signature in black ink that reads "Julie Paule". The signature is written in a cursive style with a large initial "J" and a decorative flourish at the end.

Julie Paule, Regional Representative

From: saexodus@cox.net
Sent: Tuesday, May 16, 2017 2:05 PM
To: Belinda Rojas
Subject: Proposed changes to Section 12.H

Hello, Let me suggest a couple of things.

1. Letter did not provide info on submitting comments and I don't see anything on website allowing such commentary.

Pls. resend with info telling people how to submit comments.

2. Choose a sworn Declaration, not an affidavit for objections to rent increase requests. Besides expense of notarization, (which MANY wanting to respond can't afford and/or travel to) as that would be more effective for the idea of seeking resident input into process.

3. allow the validity of an individual to have the capacity of collecting such declarations to provide the council

All of the above would show sincerity in the solicitation of resident input into the rental increase hearing process.

Bruce Sims
Carefree Ranch Mobilhome Park\
Escondido,CA

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"Be who you are and say what you feel, because those who mind don't matter and those who matter don't mind."

“One of the most important things that distinguishes science from religion is that in science we (eventually) are happy to change our minds. This is called learning. -Lawrence M. Krauss, Director of the Origins Project at Arizona State University

Karen Youel

From: noreply@www.escondido.org
Sent: Monday, May 22, 2017 3:35 PM
To: Karen Youel
Subject: [Website Feedback]: changes to the rent review board guidelines

Mary Davis
tazsme@cox.net

I think allowing a senior or disable residents to submit a signed affidavit is a very good idea. It will give them finally a chance to be heard.

Mary Davis

HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 6.3; WOW64; rv:53.0) Gecko/20100101 Firefox/53.0
REMOTE_HOST: 68.111.168.59
REMOTE_ADDR: 68.111.168.59
LOCAL_ADDR: 10.255.2.55

From: Michael Land <mikeland030@gmail.com>
Sent: Thursday, May 25, 2017 8:50 AM
To: Belinda Rojas
Subject: Your memo to me May 22, rent control amendments

Hi Belinda,

It was really nice talking with you yesterday, Thank you for mailing me the proposed changes to section 12.H or the RRB.

My wife and I are the owners of our mobile home, and we are seniors.

We agree with your proposal to make the changes as proposed to section 12.H.

Thank you,

ps. We have not received an official notice from the City of Escondido on the proposed rent increase hearing for our mobile home park, Mobile Park West. When is the hearing?

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Sincerely,

Michael Land