



Legal and Procedural Requirements for Mobilehome Park Closures and Conversions

City Council Study Session
November 5, 2025



Background

The City has 3 ordinances and code sections that regulate mobilehome parks:

1. Chapter 9.80 Mobilehome park space rent protection, updated in 2016.
2. Chapter 9.82 Mobilehome park conversions, adopted in 2004.
3. Chapter 9.84 conversion of mobilehome parks to resident ownership, adopted in 2008.



Chapter 9.82 - Mobilehome Park Conversions

1. Mandatory Relocation Impact Report (RIR)
 - The City selects an independent consultant to prepare the RIR charged to the applicant.
 - Detailed information on the park, its residents (including occupancy length and whether residents are disabled), the proposed new use, and a list of comparable mobilehome parks within Sonoma County.
 - Estimate of the full cost of relocating mobilehomes and the fair market value of any mobilehomes that cannot be reasonably relocated to another comparable park.
 - The park owner must provide a copy of the RIR and of Chapter 9.82 to all residents at least 15 days before the public hearing. New prospective residents must also be notified if a conversion application has been filed.
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Chapter 9.82 - Mobilehome Park Conversions

2. City Council Hearing and Required Findings

To approve the conversion, closure, or cessation of use, the Council must make specific written findings based on the evidence presented, including:

- Relocation Impact Report is complete;
- Available mobilehome lots exist within Sonoma County to accommodate the displaced mobilehomes at the time of conversion;
- Adequate options are available for residents affected;
- Relocation plan provides for reasonable costs of relocation;
- If conversion is to residential, opportunities are available for residents to purchase or rent; and
- The proposed conversion will not harm public health, safety, and general welfare.

If the City Council cannot make the required findings or impose sufficient mitigation measures, it must deny the application.



Chapter 9.82 - Mobilehome Park Conversions

3. Relocation Assistance (Mitigation Measures)

The City Council may impose reasonable conditions on the applicant to mitigate the impacts of relocation, not exceeding the reasonable cost of relocation documented in the RIR. These conditions may include:

- Moving Expenses
- Financial Assistance
- Rent Differential
- Home Purchase
- Affordable Housing
- The residents and applicant may agree to mutually satisfactory conditions.



AB 2782 - Mobilehome Park Conversions

AB 2782

- Requires the applicant to compensate a mobilehome occupant for the full in-place value of the mobilehome based on an appraisal, if the displaced occupant cannot be relocated to another park.
- Requires the City to make a finding that the proposed conversion will or will not reduce housing opportunities for low- and moderate-income households in the jurisdiction before approval of the application.
- Requires the applicant to provide a copy of the impact report to mobilehome owners or occupants at least 60 days before the public hearing.



AB 2782 - Mobilehome Park Conversions

Required changes to Chapters 9.82:

- The RIR to contain the “in-place” value that each mobilehome would have if the park were not being closed.
 - Update the notice requirement and disclosure provision to reflect the required 60 days.
 - Require the City Council to make a finding as to whether a conversion will result in a shortage of affordable housing.
 - Remove the language stating relocation assistance “shall not exceed the reasonable costs of relocation.”
 - Require the applicant to pay the in-place market value of any displaced resident’s mobilehome, if the resident cannot be relocated to another mobilehome park.
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SB 610 - Mobilehome Parks and Disasters

SB 610

- Requires mobilehome park owner to include a technical service inspection report from the Department of Housing and Community Development that identifies the observed conditions within the park with the RIR; and
- The mobilehome park owner is not required to pay to the displaced resident the in-place market value of the displaced resident's mobilehome.



Next Steps

- December 3 – City Council Study Session
 - Review AB 2782 allowed provisions
 - Discuss requests and concerns from mobilehome owners and mobilehome park owners
 - Request policy direction
- Feb/March – City Council Meeting
 - Consider proposed Ordinance



Recommendation

Discuss, ask questions, and request additional information for future meeting on December 5, 2025.