

**Relocation Impact Report**  
**Journey's End Mobile Home Park**  
**3575 Mendocino Avenue, Santa Rosa**

Submitted by:

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## 1.0 Executive Summary

### Overview

This Relocation Impact Report (“Report”) has been prepared for the City of Santa Rosa (“City”) and prior residents in connection with the formal process to close the Journey’s End Mobile Home Park (“Park”). This Report is required by Government Code 65863.7 and Santa Rosa Municipal Code 20-28.100.J. This Report discusses, among other things, the impact of the closure upon the prior residents of the Park and the availability of adequate replacement housing in nearby mobile home parks. It also proposes mitigation measures to provide assistance to those households whose mobile homes were destroyed, defines who is eligible for assistance and when assistance will be paid.

### Background

Prior to the 2017 wildfire, the Park was home to 160 senior households and one manager’s unit. On October 9, 2017, the Tubbs wildfire completely destroyed 117 of the 161 mobile homes and severely damaged the Park’s infrastructure. Following the wildfire, 44 mobile homes remained standing. Of the 117 destroyed mobile homes, four were vacant, 24 were occupied by tenants who rented their mobile home from 3575 Mendocino Avenue Associates, LLC (“Park Owner”) and 88 were occupied by residents who owned their mobile homes and rented a space from the Park Owner. Due to the extent of the damage to the Park and its infrastructure, the state Department of Housing and Community Development (“HCD”) determined the remaining 44 mobile homes to be uninhabitable. As a result, no residents have resided in the Park in the more than two years since the wildfire occurred.

Following the 2017 wildfire, the Park Owner partnered with the Tzu Chi Foundation, Legal Aid of Sonoma County, California Rural Legal Assistance, Burbank Housing Development Corporation, other non-profit organizations and the larger Rebuilding Our Community (ROC) collaborative network to ensure prior residents had access to as many services and resources as possible to begin rebuilding their lives. This included the provision of housing, food, funds, medical services and transportation. Amongst the first priorities was ensuring prior Park residents were signed up to receive FEMA and other federal, state and local benefits and to help them access affordable permanent, temporary and emergency housing. The provision of this assistance led to the awareness that the 44 households with mobile homes remaining were not eligible for FEMA assistance or insurance payouts because their mobile homes were not destroyed in the wildfire and, yet, they also could not return to their mobile homes due to the extent of the damage that had occurred to the Park. The Park Owner and its partners therefore prioritized providing Housing Assistance Payments to these 44 households to help ensure they could access housing and other basic needs, while continuing to provide case management and legal support to the households whose mobile homes were destroyed.

### Report Applicability

The fact that the Park was effectively destroyed as a result of the wildfire presents unique challenges related to the preparation of this Report and determining the applicability of relocation obligations under both the Government Code and the Santa Rosa Municipal Code. The Government Code provisions related to mobile home park closures are designed to ensure

that owners of mobile homes are adequately compensated for costs incurred related to the closure of a mobile home park. These costs are primarily related to the relocation of mobile homes. In this instance, as discussed more fully below, there are no mobile homes to be relocated since 117 of the mobile homes were destroyed by the wildfire and of the remaining 44 mobile homes, only 5 were determined to be movable (the majority of the remaining mobile homes have transferred to the Park Owner). Thus, unlike other relocation impact reports that focus on the condition, make, model and moving costs of existing mobile homes, this Report primarily focuses on options available to the 88 mobile home owners whose mobile homes were destroyed by the wildfire and the 24 mobile home tenants whose homes were destroyed by the wildfire. Although the prior households that are proposed to receive assistance pursuant to this Report have no costs related to moving mobile homes, the Park Owner has assessed the needs of the prior residents as well as the other benefits available and has proposed to provide the Housing Assistance Payments discussed in this Report.

This Report primarily concerns the 88 mobile home owners residing in the Park immediately prior to the October 2017 wildfire and (i) who owned their mobile homes; (ii) whose homes were destroyed, and (iii) who have not entered into a Housing Assistance Agreement with the Park Owner. The Park Owner has proposed to mitigate the impacts on these households by providing Housing Assistance Payments in the amount of \$4,500 per household.

The 24 mobile home tenants who rented their mobile homes from the Park Owner and whose homes were destroyed are subject to traditional landlord/tenant law rather than the Mobile Home Residency Law. Because these prior residents do not own a mobile home that would have had to be relocated had it not been destroyed, these prior households are not eligible for benefits under Government Code 65863.7 and Santa Rosa Municipal Code 20-28.100.J; however, the Park Owner has voluntarily proposed to mitigate the impacts on these households by also providing these households Housing Assistance Payments in the amount of \$4,500 per household.

The proposed mitigation is equivalent to approximately six months average space rent plus a one month rent security deposit in the Park. This assistance is in addition to the rent and utilities forgiven by the Park Owner immediately following the wildfire as well as the insurance proceeds and benefits prior residents have received over the past two years from numerous public and private organizations. The Park Owner is also committed to providing priority to prior qualified residents for any new affordable housing that is built on the Park site, should the Park site be redeveloped in the future.

The 44 households whose mobile homes were not destroyed by the wildfire have entered into Housing Assistance Agreements with the Park Owner and received Housing Assistance Payments; as such, they are not the subject of this Report per Santa Rosa Municipal Code Section 20-28.100.J.8.c. Four of the units were vacant at the time of the 2017 wildfire and one unit was a Park owned mobile home occupied by the Park manager; these units are not the subject of this Report.

Following review and approval of this Report by the City of Santa Rosa, the Park Owner will provide Housing Assistance Payments to, and will enter into Housing Assistance Agreements

with, the 88 mobile home owners who owned their mobile homes that were destroyed and the 24 mobile home tenants who rented their mobile homes from the Park Owner that were destroyed.

## 2.0 Report Requirements

As required by Santa Rosa Municipal Code Section 20-28.100.J.3.b, this Report has been prepared by Goldfarb & Lipman, LLP experts in relocation law as well as the mobile home park closure process and experienced in the preparation of relocation impact reports (See Statement of Qualifications at Attachment A). This Report is presented by the Park Owner to the prior residents of the Park and to the City in connection with the formal Park closure process required by the California Government Code and City of Santa Rosa Municipal Code.

Government Code Section 65863.7 and Santa Rosa Municipal Code Chapter 20-28.100.J<sup>1</sup> require that a person proposing closure of a mobile home park prepare a report discussing the impact of the closure upon the displaced residents of the park. In determining the impact of the closure on the displaced residents the report must address, among other things, the availability of adequate replacement housing in other mobile home parks and relocation costs (See Government Code, §65863.7 and Santa Rosa Municipal Code Chapter 20-28.100.J.3.c.9 and c.11 at Attachment B). The report is provided to the displaced residents and the City, in advance of the City public hearing to consider closure of the park. At the hearing, the City will review the report and may determine applicable conditions, if any, to mitigate any adverse impact of the closure on the ability of displaced residents to find adequate housing. The steps required to be taken to mitigate the impact cannot exceed the reasonable costs of relocation {Government Code, §65863.7(e) and Santa Rosa Municipal Code Section 20-28.100.J.7}.

This Report has been prepared in accordance with the requirements of Government Code Section 65863.7 and Santa Rosa Municipal Code Chapter 20-28.100.J and primarily concerns the 88 mobile home owners who resided in the Park immediately prior to the October 2017 wildfire, who owned their mobile home, whose homes were destroyed, and who have not entered into a Housing Assistance Agreement with the Park Owner. This Report also addresses the 24 mobile home tenants who rented their mobile homes from the Park Owner and whose homes were destroyed. The 44 households whose mobile homes were not destroyed by the wildfire have been provided Housing Assistance Payments, have entered into Housing Assistance Agreements with the Park Owner and, therefore, are not the subject of this Report per Santa Rosa Municipal Code Section 20-28.100.J.8.c.

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<sup>1</sup> As provided for by Santa Rosa Municipal Code Section 20-28.100.J, mobile home parks proposed for closure that were affected by the 2017 Tubbs wildfire, that are located in the RC Combining District and lost over 50% of their total units as a result of the wildfire, may apply the standards of this section.

### 3.0 Preparation of Report

The preparation of this Report involved the following process:<sup>2</sup>

1. Review of available Park records to identify prior residents and terms of tenancy;
2. Survey and follow-up interviews with prior residents to determine particular situations, interest for various relocation options and to begin connecting prior residents with disaster relief funds and other available resources and services;
3. Individual meetings with the households of the 44 remaining mobile homes to provide assistance accessing available resources and services and provide them with Housing Assistance Payments (in accordance with a Housing Assistance Agreement) to mitigate the impacts of the wildfire while they awaited a determination on eligibility for disaster relief funds including FEMA, insurance, CDBG-DR, etc.;
4. Survey and follow-up interviews with prior residents to determine any public and private benefits received, their current living arrangements and assess potential housing needs; and
5. Survey of mobile home park opportunities and alternative housing opportunities within 50 miles of the Santa Rosa City limits.

This Report has been prepared using the best available records at the time of preparation. The majority of the Park records were maintained on-site and, as a result, were destroyed in the October 2017 wildfire. The information contained herein is derived from the Park's accounting system (which was maintained off-site), interviews with prior residents, field surveys, and information obtained from HCD. Based on the evaluation of such information and in compliance with State law, appropriate mitigation measures have been proposed (See Section 12.0 Relocation Plan).

At the time of preparation of this Report, an application for redevelopment of the Park site has not been filed and no new use has been proposed; therefore, the information required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.7 and c.8 has not been provided.

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<sup>2</sup> The Tzu Chi Foundation, an international humanitarian and non-governmental organization providing disaster relief, has worked closely with the prior residents since the wildfire. The Tzu Chi Foundation conducted the surveys/interviews with the prior residents.

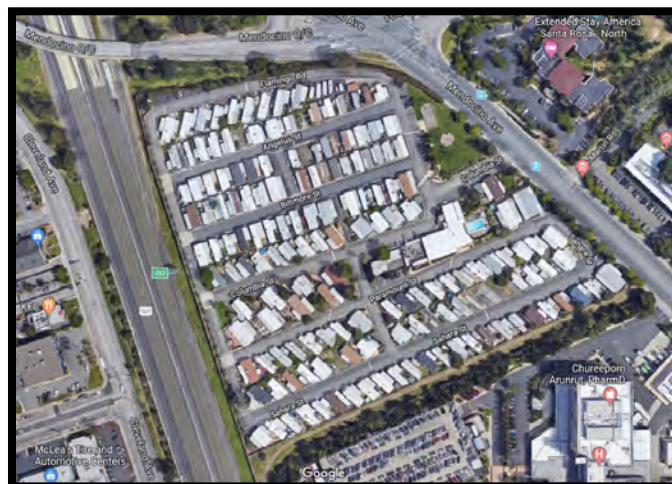
## 4.0 Background

The Journey's End Mobile Home Park is located at 3575 Mendocino Avenue within the Santa Rosa City limits and occupies Assessor's Parcel Number 173-030-001. As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.1 and c.2, a map and legal description of the Park is attached hereto (See Legal Description at Attachment C and Park Map at Attachment D).

The Park site is comprised of approximately 13.31 acres located adjacent to US Highway 101, the Mendocino Avenue Over-change and Mendocino Avenue. Bicentennial Way is located approximately ¼ mile south of the Park site. Adjacent uses include commercial uses, medical office and services, visitor lodging and retail services. The Kaiser Permanente medical campus is located to the south of the Park site.

The Park is owned by 3575 Mendocino Avenue Associates, LLC (See Parcel Report at Attachment E). The Park Owner initially constructed the Park in 1958. At the time of construction, the Park was located on the northernmost edge of Santa Rosa thus earning the name Journey's End Mobile Home Park. More than sixty years later, the Park is completely surrounded by urban development, including the heavily traveled US Highway 101 located on its western boundary.

Prior to the 2017 wildfire, the Park was home to 160 senior households and one manager's unit and was a fully developed mobile home park including paved roads and driveways, and gravel pads for the mobile homes. Park amenities included a clubhouse, pool, game room, laundry room, RV storage, car wash, and dog run available for use by its residents. Vegetation on the site was very limited, including a small lawn area near Mendocino Avenue and small landscaping areas adjacent to individual mobile homes. Entrance to the Park was gained from the west side of Mendocino Avenue and a network of on-site streets allowed access for vehicles throughout the Park. Pacific Gas & Electric provided gas and electric utilities to the Park site and sewer service was provided by the City of Santa Rosa. Water supply was provided from two private on-site wells and an aboveground water distribution system (See Figure 1). The monthly average rent previously offered at the Park was approximately \$650 per month.



**Figure 1: Journey's End Mobile Home Park, pre-2017 wildfire**



In the early morning of October 9, 2017, the Tubbs wildfire destroyed the Park's infrastructure and 117 of the mobile homes. The 44 mobile homes that remained standing following the wildfire have been uninhabitable since the wildfire due to damaged utilities. In the months following the wildfire, HCD issued a report documenting the extent of the destruction to the Park and its infrastructure. In that report, HCD prohibited occupancy of the Park "until the Park infrastructure is rebuilt, replaced or corrected" (See HCD Report at Attachment F). Subsequent to the HCD report, the State Water Resources Control Board determined that the on-site well that historically provided water to the mobile homes can no longer be used for domestic purposes and it was determined current plumbing codes will not allow the use of an above-ground water distribution system like the one that existed in the Park prior to the wildfire. As a result, no residents have resided in the Park in the more than two years since the wildfire occurred (As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.2; See Figure 2). Given the significant cost to construct a new water system connected to City water service, as well as restore the Park's sewer, gas, and electric systems, the Park Owner has concluded that it is not economically feasible to reopen the Park and it is, therefore, necessary to undertake the formal Park closure process required by the Government Code and Santa Rosa Municipal Code.



**Figure 2: Journey's End Mobile Home Park, post-2017 Tubbs wildfire**

The 44 remaining mobile homes were assessed to determine their ability to be moved and to try to identify another mobile home park they could be relocated to. At the time of preparation of this Report, approximately five of the remaining 44 mobile homes have been removed from the Park for use in another location. However, based on their condition, the remaining mobile homes cannot be moved and, given their age, they are not likely to be accepted by another mobile home park.

Following the 2017 wildfire, the Park Owner partnered with the Tzu Chi Foundation, Legal Aid of Sonoma County, California Rural Legal Assistance, Burbank Housing Development Corporation, other non-profit organizations and the larger Rebuilding Our Community (ROC) collaborative network to ensure prior residents had access to the services and resources needed to begin rebuilding their lives. The support provided included the provision of housing,



food, monetary contributions, medical services and transportation, among others. Amongst the first priorities was ensuring prior residents were signed up to receive available public benefits including FEMA and other federal, state and local benefits and to place them in available housing, including affordable permanent, temporary and emergency housing. The provision of this assistance led to the awareness that the 44 households with mobile homes remaining were not eligible for FEMA assistance or insurance payouts because their mobile homes were not destroyed in the wildfire and, yet, they also could not return to their mobile homes due to the extent of the damage that had occurred to the Park. Notwithstanding the fact that the wildfire destroyed the Park and that the Park is not subject to federal or state relocation laws<sup>3</sup>, the Park Owner provided Housing Assistance Payments to and entered into Housing Assistance Agreements with the 44 households with mobile homes remaining to help ensure they too could get access to housing and other basic needs, while continuing to provide case management and legal support to the households whose mobile homes were destroyed.

## 5.0 Estimated Number of Displacements

The following summarizes the estimated number of households displaced from the Park by the wildfire. There were 161 spaces in the Park. Following the wildfire, 117 mobile homes were completely destroyed and 44 remained standing.

Of the 117 destroyed mobile homes, four were vacant and 113 were occupied immediately prior to the October 2017 wildfire. Of the 113 destroyed mobile homes that were occupied, 24 were Park owned mobile homes occupied by tenants who rented their mobile home from the Park Owner, one was occupied by the Park Manager; and 88 were occupied by prior residents who owned their mobile homes and rented a space from the Park Owner.<sup>4</sup>

Of the 44 mobile homes remaining, 11 were occupied by tenants who rented their mobile home from the Park Owner, and 33 were owned by prior residents.

The above is summarized in Table 1 below, as follows:

**Table 1: PARK STATISTICS - POST-2017 TUBBS WILDFIRE**

Type of Use	# Of Spaces	
	Destroyed	Remaining
Resident Owned	88	33
Park Owned	24	11
Manager's Unit	1	0
Vacant	<u>4</u>	<u>0</u>
<b>Subtotal</b>	<b>117</b>	<b>44</b>
<b>Total</b>	<b>161</b>	

<sup>3</sup> Government Code 7260 et seq.; 42 U.S.C. Chap. 61 et seq. which require the payment of relocation benefits to residents displaced as a result of public acquisition of property or public funding of a project.

<sup>4</sup> In the months following the wildfire, seven of the prior residents of the destroyed mobile homes voluntarily terminated tenancy with the Park and therefore are not technically eligible for assistance but are included in the group of prior residents eligible for assistance by the Park Owner voluntarily.

## 6.0 Summary of Eligible Residents

The effective date for determining eligibility for benefits is October 9, 2017, the date the Park was destroyed by the wildfire. The following summarizes the residents eligible to receive assistance. A discussion of the assistance proposed to mitigate impacts to eligible prior residents is included in Section 12.0 Relocation Plan.

### Destroyed Resident Owned Mobile Homes

The 88 mobile home owners who owned their mobile homes and whose homes were destroyed, who resided in the Park immediately prior to the October 2017 wildfire and who have not entered into a Housing Assistance Agreement with the Park Owner are eligible to receive assistance under Government Code 65863.7 and Santa Rosa Municipal Code 20-28.100.J.

### Destroyed Park Owned Mobile Homes

The 24 mobile home tenants who rented their mobile homes from the Park Owner and whose homes were destroyed, are not eligible for benefits under Government Code 65863.7 and Santa Rosa Municipal Code 20-28.100.J because these tenants did not own a mobile home that would have been required to be moved in the closure process if the mobile home had not been destroyed. However, the Park Owner has voluntarily proposed to provide assistance to tenants who resided in destroyed park owned mobile homes immediately prior to the wildfire (and have not since passed away) as a part of the Relocation Plan contained in this Report.

### Remaining Park Owned Mobile Homes & Remaining Resident Owned Mobile Homes

The 44 households whose mobile homes remain standing have entered into Housing Assistance Agreements with the Park Owner and have been provided Housing Assistance Payments and are not the subject of this Report per Santa Rosa Municipal Code Section 20-28.100.J.8.c.

As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.5, a summary of all of the prior Park households, including whether or not they have entered into a Housing Assistance Agreement with the Park Owner, is set forth in Table 2 below.<sup>5,6,7</sup> The 88 mobile home owners whose mobile homes were destroyed by the wildfire and the 24 mobile home tenants whose homes were destroyed by the wildfire, for whom assistance is proposed, are shown in grey in the table below.

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<sup>5</sup> As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.3, to the extent such information was readily available, the names and addresses of all mobile homeowners and tenants occupying the Park (including absentee mobile homeowners) were submitted to the City via email on November 1, 2019.

<sup>6</sup> As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.6, the total number of mobile home owners and tenants occupying each space in the Park has not been provided because the majority of the Park records were maintained on-site and, as a result, were destroyed in the October 2017 wildfire; therefore the information is not readily available.

<sup>7</sup> Per Santa Rosa Municipal Code Section 20-28.100.J.3.c.4, information related to date of manufacture, model and tradename, length, width, and number of bedrooms is not required for mobile homes owned by the Park Owner, mobile homes destroyed as a result of a disaster or that have been removed from the mobile home park; therefore this information has not been provided. Further, all of the 44 households of the remaining mobile homes that were not destroyed have entered into Housing Assistance Agreements with the Park Owner on mutually satisfactory compensation or other benefits and therefore, per Santa Rosa Municipal Code Section 20-28.100.J.8.c, this information is not required and has not been provided.

**Table 2: SUMMARY OF PRIOR PARK OCCUPANTS**

Space # <sup>8</sup>	Coach Status	Reached Agreement	Occupancy Term <sup>9</sup>	Monthly Space Rent <sup>10</sup>	Occupancy Status <sup>11</sup>
3	Destroyed	No	29 years	\$567.99	Own
4	Destroyed	No	21 years	\$562.64	Own
5	Destroyed	No	11 years	\$612.95	Own
6	Destroyed	No	13 years	\$574.48	Own
7	Destroyed	No	31 years	\$485.48	Own
8	Destroyed	No	2 years	\$550.34	Own
9	Destroyed	No	5 years	\$563.16	Own
10	Destroyed	No	11 years	\$564.48	Own
13	Destroyed	No	17 years	\$530.80	Own
14	Destroyed	No	5 years	\$602.71	Own
15	Destroyed	No	29 years	\$529.72	Own
16	Destroyed	No	1 year	\$668.30	Own
17	Destroyed	No	3 years	\$600.34	Own
18	Destroyed	No	12 years	\$604.76	Own
20	Destroyed	No	1 month	\$825.81	Own
21	Destroyed	No	30 years	\$482.86	Own
25	Destroyed	No	9 years	\$551.06	Own
27	Destroyed	No	14 years	\$582.94	Own
28	Destroyed	No	5 years	\$538.14	Own
29	Destroyed	No	1 year	\$596.90	Own
30	Destroyed	No	7 years	\$618.10	Own
32	Destroyed	No	10 years	\$691.54	Own
34	Destroyed	No	1 year	\$557.56	Own
35	Destroyed	No	2 years	\$640.45	Own
36	Destroyed	No	2 years	\$559.77	Own
37	Destroyed	No	1 year	\$574.49	Own
38	Destroyed	No	3 years	\$648.07	Own

<sup>8</sup> As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.5.

<sup>9</sup> As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.5.

<sup>10</sup> As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.5. Includes monthly costs associated with space rent, coach rent, utilities, rent control fee, insurance and mortgage (as applicable), less any concessions.

<sup>11</sup> As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.6. "Rent" means the mobile home was Park Owned and rented from the Park; "Own" means the mobile home was resident owned.

Space #	Coach Status	Reached Agreement	Occupancy Term	Monthly Space Rent	Occupancy Status
39	Destroyed	No	21 years	\$519.76	Own
40	Destroyed	No	32 years	\$477.33	Own
42	Destroyed	No	19 years	\$602.00	Own
43	Destroyed	No	16 years	\$694.27	Own
44	Destroyed	No	9 years	\$586.38	Own
45	Destroyed	No	1 year	\$559.80	Own
46	Destroyed	No	11 years	\$608.73	Own
47	Destroyed	No	1 year	\$581.01	Own
48	Destroyed	No	16 years	\$773.16	Own
49	Destroyed	No	10 months	\$597.18	Own
50	Destroyed	No	3 years	\$599.73	Own
51	Destroyed	No	23 years	\$537.32	Own
53	Destroyed	No	7 years	\$554.45	Own
58	Destroyed	No	12 years	\$584.32	Own
60	Destroyed	No	3 years	\$633.79	Own
62	Destroyed	No	3 years	\$631.68	Own
63	Destroyed	No	32 years	\$506.79	Own
64	Destroyed	No	7 years	\$565.29	Own
65	Destroyed	No	4 years	\$658.17	Own
66	Destroyed	No	5 years	\$617.59	Own
67	Destroyed	No	16 years	\$1,053.72	Own
68	Destroyed	No	4 years	\$535.60	Own
69	Destroyed	No	7 years	\$547.81	Own
70	Destroyed	No	33 years	\$470.02	Own
71	Destroyed	No	1 year	\$593.70	Own
72	Destroyed	No	2 months	\$594.65	Own
73	Destroyed	No	15 years	\$577.88	Own
74	Destroyed	No	8 years	\$582.47	Own
75	Destroyed	No	18 years	\$576.36	Own
80	Destroyed	No	10 years	\$573.41	Own
81	Destroyed	No	15 years	\$535.55	Own
83	Destroyed	No	17 years	\$622.88	Own
84	Destroyed	No	15 years	\$595.63	Own

Space #	Coach Status	Reached Agreement	Occupancy Term	Monthly Space Rent	Occupancy Status
85	Destroyed	No	9 years	\$588.58	Own
86	Destroyed	No	4 years	\$652.85	Own
87	Destroyed	No	4 years	\$602.32	Own
88	Destroyed	No	2 years	\$609.06	Own
89	Destroyed	No	4 months	\$640.54	Own
90	Destroyed	No	5 years	\$607.95	Own
91	Destroyed	No	24 years	\$664.82	Own
92	Destroyed	No	21 years	\$610.04	Own
93	Destroyed	No	7 years	\$588.96	Own
95	Destroyed	No	15 years	\$712.17	Own
96	Destroyed	No	1 year	\$783.77	Own
97	Destroyed	No	3 years	\$537.02	Own
98	Destroyed	No	2 years	\$575.10	Own
100	Destroyed	No	13 years	\$611.86	Own
101	Destroyed	No	2 years	\$605.89	Own
103	Destroyed	No	9 years	\$600.17	Own
104	Destroyed	No	2 years	\$583.51	Own
106	Destroyed	No	4 years	\$551.33	Own
107	Destroyed	No	6 years	\$563.70	Own
108	Destroyed	No	3 years	\$583.93	Own
127	Destroyed	No	10 years	\$567.73	Own
128	Destroyed	No	6 years	\$543.99	Own
130	Destroyed	No	2 years	\$602.65	Own
131	Destroyed	No	7 years	\$641.78	Own
132	Destroyed	No	17 years	\$581.37	Own
133	Destroyed	No	8 years	\$611.99	Own
134	Destroyed	No	2 years	\$547.52	Own
135	Destroyed	No	13 years	\$556.10	Own
2	Destroyed	No	1 month	\$507.53	Rent
11	Destroyed	No	12 years	\$894.06	Rent
12	Destroyed	No	3 years	\$915.54	Rent
19	Destroyed	No	5 years	\$598.24	Rent
22	Destroyed	No	3 months	\$908.83	Rent

Space #	Coach Status	Reached Agreement	Occupancy Term	Monthly Space Rent	Occupancy Status
24	Destroyed	No	3 years	\$966.20	Rent
26	Destroyed	No	6 years	\$974.02	Rent
33	Destroyed	No	3 years	\$757.69	Rent
41	Destroyed	No	2 years	\$967.11	Rent
52	Destroyed	No	2 years	\$868.63	Rent
54	Destroyed	No	3 years	\$813.90	Rent
57	Destroyed	No	20 years	\$790.42	Rent
59	Destroyed	No	2 years	\$883.38	Rent
61	Destroyed	No	2 years	\$948.80	Rent
76	Destroyed	No	4 years	\$700.05	Rent
77	Destroyed	No	2 years	\$840.92	Rent
78	Destroyed	No	15 years	\$908.18	Rent
79	Destroyed	No	1 month	\$870.45	Rent
82	Destroyed	No	7 years	\$847.68	Rent
94	Destroyed	No	5 years	\$989.39	Rent
99	Destroyed	No	4 years	\$928.76	Rent
102	Destroyed	No	4 years	\$948.20	Rent
105	Destroyed	No	4 years	\$997.23	Rent
129	Destroyed	No	7 years	\$946.17	Rent
1	Destroyed	No	1 year	\$100.28	Manager
23	Destroyed	No	N/A	\$0.00	Vacant
31	Destroyed	No	N/A	\$0.00	Vacant
55	Destroyed	No	N/A	\$0.00	Vacant
56	Destroyed	No	N/A	\$0.00	Vacant
109	Remaining	Yes	3 months	\$556.21	Own
110	Remaining	Yes	7 years	\$568.67	Own
111	Remaining	Yes	4 years	\$959.61	Own
112	Remaining	Yes	8 years	\$565.14	Own
113	Remaining	Yes	13 years	\$594.51	Own
114	Remaining	Yes	9 years	\$565.07	Own
115	Remaining	Yes	2 years	\$576.69	Own
116	Remaining	Yes	40 years	\$584.37	Own
118	Remaining	Yes	2 years	\$609.25	Own
119	Remaining	Yes	34 years	\$472.88	Own

Space #	Coach Status	Reached Agreement	Occupancy Term	Monthly Space Rent	Occupancy Status
120	Remaining	Yes	2 years	\$1,525.57	Own
121	Remaining	Yes	3 years	\$612.94	Own
125	Remaining	Yes	2 years	\$985.97	Own
126	Remaining	Yes	13 years	\$572.56	Own
136	Remaining	Yes	12 years	\$556.31	Own
137	Remaining	Yes	13 years	\$697.26	Own
138	Remaining	Yes	24 years	\$633.93	Own
140	Remaining	Yes	5 years	\$607.99	Own
141	Remaining	Yes	31 years	\$517.47	Own
143	Remaining	Yes	15 years	\$631.96	Own
144	Remaining	Yes	7 years	\$616.66	Own
145	Remaining	Yes	3 years	\$734.89	Own
148	Remaining	Yes	37 years	\$424.87	Own
149	Remaining	Yes	4 years	\$583.59	Own
150	Remaining	Yes	18 years	\$1,427.09	Own
152	Remaining	Yes	9 years	\$580.80	Own
154	Remaining	Yes	14 years	\$612.29	Own
155	Remaining	Yes	1 year	\$561.64	Own
157	Remaining	Yes	1 year	\$574.68	Own
158	Remaining	Yes	14 years	\$613.81	Own
159	Remaining	Yes	31 years	\$494.04	Own
160	Remaining	Yes	17 years	\$559.39	Own
161	Remaining	Yes	5 years	\$711.14	Own
117	Remaining	Yes	1 year	\$862.68	Rent
122	Remaining	Yes	3 years	\$916.01	Rent
123	Remaining	Yes	4 years	\$914.08	Rent
124	Remaining	Yes	4 years	\$928.24	Rent
139	Remaining	Yes	3 years	\$968.10	Rent
142	Remaining	Yes	1 year	\$126.52	Rent
146	Remaining	Yes	9 years	\$872.48	Rent
147	Remaining	Yes	6 years	\$884.10	Rent
151	Remaining	Yes	17 years	\$993.72	Rent
153	Remaining	Yes	4 years	\$889.56	Rent
156	Remaining	Yes	9 years	\$852.43	Rent



## 7.0 Assistance Provided to Prior Residents

Following the 2017 wildfire, the Park Owner partnered with the Tzu Chi Foundation, Legal Aid of Sonoma County, California Rural Legal Assistance, Burbank Housing Development Corporation and the larger Rebuilding Our Community (ROC) collaborative network to help ensure prior residents had access to the resources needed to begin rebuilding their lives. The support provided included housing, food, monetary contributions, medical services, and transportation, among others. Assistance, from both public and private sources, available to prior residents includes:

- FEMA benefits including disaster relief funds of up to \$34,000, as well as other public assistance;
- Short term housing in FEMA trailers at the Sonoma County Fairgrounds and apartments throughout Sonoma County was provided for 19 prior residents for up to 18 months;
- Community Development Block Grant Disaster Relief (CDBG-DR) funds made available through the state's Owner-Occupied Housing Rehabilitation and Reconstruction Program (OOHRRP) of up to \$150,000 (anticipated in 2020; see discussion below);
- Insurance proceeds of up to \$150,000 for personal property and structures, contents, damage repairs, rent assistance, etc.;
- Kaiser Permanente Northern California Community Benefit Program granted \$510,000 to the Tzu Chi Foundation to assist with addressing the housing needs of prior residents including security deposits, rent subsidies, moving costs, etc.;
- ROC Unmet Needs Committee provided funding in the amount of approximately \$495,000 to assist six prior residents with the purchase of six replacement mobile homes;
- United Way of the Wine Country awarded \$15,000 from its Neighborhood Grants Program to the prior resident's association to fund community building efforts among prior residents;
- Luther Burbank Savings Grant provided funding in the amount of \$10,000 which was distributed by the Tzu Chi Foundation in the form of gift cards to 100 prior households;
- Wildfire Assistance Program Payments in the amount of \$5,000 funded by Pacific Gas and Electric Company to support needs such as water, food, prescriptions, medical supplies and equipment, personal hygiene items, and transportation/fuel needs;
- Funds from Redwood Credit Union in the amount of \$4,600 per household to assist with recovery needs;
- Red Cross Assistance of up to \$2,600 per household;
- Hotel vouchers for up to six months funded by St. Vincent de Paul to ensure prior residents were housed immediately following the wildfire;
- Western Manufactured Housing Communities Association provided \$250 gift cards to prior residents who owned their mobile homes;

- The City of Santa Rosa Housing Authority wrote off rehabilitation loans for three of the mobile homeowners; and
- Numerous private donations of gift cards were made to ensure former residents had access to food, clothing, supplies, etc. immediately following the fires, including \$34,000 in gift cards from Sonoma County Fire Relief.

In addition to the above private and public assistance, the Park Owner:

- Provided Housing Assistance Payments for the 44 households whose mobile homes remained standing to assist them in obtaining alternative housing and to pay housing costs such as increased rent or space rent costs, moving costs, costs associated with replacing their mobile home and furniture and costs associated with searching for alternative housing; and
- Returned/forgave rent paid/due for the month of October 2017 as well as amounts paid/due for utilities utilized during the month of September 2017 for all prior residents.

Table 3 below summarizes the source of some of the assistance available to prior residents, depending upon whether their mobile home was destroyed or remaining.

**Table 3: SUMMARY OF AVAILABLE ASSISTANCE**

Available Assistance by Type			
Status	Insurance	FEMA	Housing Assistance
Destroyed	X	X	X
Remaining			X

Survey data from the ROC database and interviews with prior residents indicate 89 households of the destroyed mobile homes received insurance and/or FEMA benefits. Table 4 below summarizes those benefits:

**Table 4: SUMMARY OF BENEFITS PAID - DESTROYED MOBILE HOMES**

Benefit	# Received Benefit	Maximum Benefit
Insurance	34	Up to \$150,000
FEMA	41	Up to \$34,000
Combined FEMA & Insurance	14	Up to \$184,000

In addition to the assistance above, other services and support available to prior residents include:

- Case management services through the ROC collaborative network, provided by two Tzu Chi staff members, to ensure support and access to resources including rental assistance, housing placement, assistance signing up for Section 8 Vouchers, financial assistance, medical services and emotional support, among others;
- Legal representation, provided by Legal Aid of Sonoma County and California Rural Legal Assistance, to advocate on behalf of prior residents including the 44 households

whose mobile homes remain standing to ensure insurance companies adequately compensate them for the loss of use of their mobile home;

- Placement of 27 prior residents in affordable housing owned and operated by Burbank Housing Development Corporation, and other affordable housing providers, immediately following the fires to ensure prior residents continue to live affordably and within their means;
- Assistance negotiating deferred mortgage loan payments from private lenders;
- Assistance applying for Santa Rosa Housing Choice Vouchers for those prior residents who are most vulnerable and would not otherwise be able to afford housing in Santa Rosa, resulting in seven vouchers being awarded to prior residents; and
- Advocacy on behalf of the prior residents at the local, state and federal level to raise awareness for the challenges faced by lower-income, senior fire survivors and facilitate the provision of additional resources.

At the time of preparation of this Report, many of these services and resources continue to be available. In addition to the resources currently available, HCD expects to begin administering the \$47,627,648 statewide CDBG-DR Owner-Occupied Housing Rehabilitation and Reconstruction Program (OOHRRP) that will provide grants to disaster survivors, including prior Journey's End mobile homeowners as well as other homeowners statewide, in 2020 to help further address their housing needs. Under this program, prior residents of the Park who owned and occupied their mobile home as their primary residence immediately prior to the wildfire will be eligible for a grant of up to \$150,000.

The OOHRRP was developed in response to a post-wildfire disaster needs assessment and action plan prepared by HCD which determined the effects of the wildfire disaster and evaluated, among other things, housing needs. Formulation of the action plan included several public outreach meetings and comment periods, during which, the specific needs of the Park's prior residents were conveyed to HCD by representatives of Legal Aid of Sonoma County and Burbank Housing Development Corporation as well as several of the prior residents themselves, both in writing and verbally.

The OOHRRP has been specifically designed to address the needs of vulnerable populations, including the prior Park residents, who are very-low, low-, and moderate-income households that were made homeless as a result of the 2017 wildfire. Based upon the applicant prioritization contained in the action plan, the Park's prior residents are amongst the highest priority applicants in the program.

HCD has distributed a survey for the program, the results of which will further inform the use of recovery funds. At the time of preparation of this Report, the Park Owner in collaboration with the partners identified above have begun working with the prior residents to complete the survey which will help ensure the survey results and, accordingly the final program design, reflect the needs of the prior Park residents. While HCD will provide case management to prior residents as part of the program, the partners identified above will continue to support prior residents as they work through the program.

## 8.0 Ability to Relocate Mobile Homes

The 2017 wildfire destroyed 117 of the mobile homes in the Park. At the time of preparation of this Report, title to all but five of the 44 remaining mobile homes have been transferred to the Park Owner. Transfer of the five mobile homes is pending resolution of insurance payouts, which is being overseen by Legal Aid of Sonoma County.

The remaining mobile homes were assessed to determine their ability to be moved and to try to identify another mobile home park they could be relocated to. At the time of preparation of this Report, approximately five of the mobile homes have been removed from the Park for use in another location. However, based on their condition, the remaining mobile homes cannot be moved and, given their age, they are not likely to be accepted by another mobile home park.

As a result, there are no mobile homes that are eligible to be relocated to a comparable mobile home park and therefore no estimate of cost to relocate the mobile homes, estimate of fair market or replacement value, or contact information for qualified mobile home movers or appraisers have been provided.<sup>12</sup>

## 9.0 Available Mobile Home Parks

As described above, no mobile homes are viable for relocation to another mobile home park. However, some prior residents have expressed an interest in living in another mobile home park in or near Santa Rosa. Therefore, and as required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.9, the Park Owner conducted a survey of mobile home parks located within Sonoma County and determined that there are a number of mobile home parks with mobile homes available for sale within the County. A summary of the parks surveyed in Sonoma County is contained in Table 5 below. Seven of the parks surveyed offered space rent comparable to the monthly average rent previously offered at the Park (approximately \$650/month). The parks identified below also have amenities comparable to, or better than, those previously provided in the Park.

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<sup>12</sup> As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.10, c.11, c.12 and c.16.

**Table 5: AVAILABLE MOBILE HOME PARKS**

<b>Park Name</b>	<b>Park Location</b>	<b># of Spaces</b>	<b># Homes for Sale</b>	<b>Approx Space Rent<sup>13</sup></b>	<b>Distance from Park</b>	<b>Park Amenities</b>	<b>Proximity to Services</b>
Lazarottos MHP	18925 Sonoma Hwy, Sonoma, Ca 95476, (707) 996-7773	64	1	\$400 - \$500*	18 miles	Laundry	Shopping center, restaurants, bus stop
Blue Spruce MH Lodge	8800 Green Valley Rd, Sebastopol, Ca 95472, (707) 823-5000	54	2	\$550 - \$800*	7.6 miles	Pool, Clubhouse, Storage Parking	Gas station, bus stop
Valley Village Mobile Estates	6401 Country Club Dr, Rohnert Park, Ca 94928, (707) 585-2599	285	5	\$550 - \$950	8.9 miles	Heated Pool, Spa, Green Areas	SMART, grocery store, bus stop, drug store, medical services
Rancho Feliz Mobile Home Park	6607 Redwood Drive, Rohnert Park, Ca 94928, (707) 584-0120	297	3	\$580 - \$900	8.9 miles	Pool, Two Parks, Laundry Room, Club House	Restaurants, drug store, bus stop
Seven Flags Of Sonoma	300 International Blvd, Sonoma, Ca 95476, (707) 996-9660	292	1	\$650 - \$1050	19.5 miles	Pool + Pool, Sauna, Library, Club House, Exercise Room	Bus stop
Rancho Santa Rosa	3455 Santa Rosa Ave, Santa Rosa, Ca 95407, (707) 584-9280	82	1	\$660-860	5.6 miles	Pool, Clubhouse	Bus stop
Lamplighter MHP	2800 Santa Rosa Ave, Santa Rosa, Ca 95407, (707) 544-1247	109	3	\$670	4.6 miles	Clubhouse, Dog Park	Bus stop, shopping center, restaurants
Rancho Grande MH Community	5099 Snyder Ln, Rohnert Park, Ca 94928, (707) 584-1713	308	10	\$700	8.6 miles	Pool, Spas, RV Parking (Separate), Semi-Gated	Bus stop, community center, church

<sup>13</sup> Space rents listed with an asterisk do not include all utilities.

<b>Park Name</b>	<b>Park Location</b>	<b># of Spaces</b>	<b># Homes for Sale</b>	<b>Approx Space Rent</b>	<b>Distance from Park</b>	<b>Park Amenities</b>	<b>Proximity to Services</b>
Moon Valley MHP	1001 5th St West, Sonoma, Ca 95476, (707) 996-2818	247	5	\$700-\$1300*	19.1 miles	Two clubhouses, Pool + hot tub, Billiards, Shuffle Board, 2 Libraries, TV Room, Laundry Facility, Wood Shop	Bus stop, park, hospital
Petaluma Estates	901 N. McDowell Blvd, Petaluma, Ca 94954, (707) 763-8501	215	2	\$732 - \$855*	15.2 miles	Pool + Spa, Tennis Court, Billiard Room, Club House, Library, Community Garden, Car Wash	Bus stop, medical services, financial services
Santa Rosa Village	4001 Sonoma Hwy, Santa Rosa, Ca 95409, (707) 539-0399	170	2	\$750*	2.9 miles	Pool + Hot Tub, Kitchen, Club House, Laundry, Social Committee, Exercise Class	Restaurants
Rincon Valley MH Estates	4671 Circle Dr, Santa Rosa, Ca 95405, (707) 539-3768	230	11	\$750*	3.1 miles	Big Pool, Spa, Laundry Facilities, Game Room, Club House, Library, Dog Park	
Redwood Village MHP	301 Airport Blvd, Santa Rosa, Ca 95403, (707) 527-9600	67	2	\$760 - \$1200	3.4 miles	Pool, Laundry, Clubhouse	Bus stop, market
Royal Mobile Manor	6555 Old Redwood Hwy, Windsor, Ca 95492, (707) 838-2546	79	2	\$825	5.6 miles	Laundry Room	Bus stop

<b>Park Name</b>	<b>Park Location</b>	<b># of Spaces</b>	<b># Homes for Sale</b>	<b>Approx Space Rent</b>	<b>Distance from Park</b>	<b>Park Amenities</b>	<b>Proximity to Services</b>
Leisure Lake Village	300 Stony Point Rd, Petaluma, Ca 94952, (707) 763-6805	134	1	\$850*	14.1 miles		
Fircrest MHP	965 Gravenstein Hwy South, Sebastopol, Ca 95472, (707) 823-6811	87	2	\$850 - \$1150	7.3 miles	Clubhouse, Laundry, Pool	Bus stop, park, restaurants, church
The Orchard	1945 Piner Rd, Santa Rosa, Ca 95403, (707) 526-7624	233	3	\$865	1.2 miles	Clubhouse, Pool + Jacuzzi, Exercise Room, Game Room, Sauna, Two Tennis Courts, Bocci, Horseshoes, Shuffle Board	Restaurants, drug store
Roseland Mobile Home Park	1355 Sebastopol Rd, Santa Rosa, Ca 95401, (707) 575-3234	58	4	\$860 - \$910	3 miles	Laundry, Clubhouse.	Bus stop, restaurants, grocery store, shopping center
Rancho Verde MHP	750 Rohnert Park Expy, Rohnert Park, Ca 94928, (707) 584-1563	300	N/A	\$876	8.5 miles	Two pools, Spa, Baseball Diamond, Basketball Court, Playground, Big Greenbelt (Pet Friendly), Picnic Tables.	Bus stop, grocery store, shopping center
Windsor Mobile Country Club	8109 Conde Ln, Windsor, Ca 95492, (707) 838-2524	334	8	\$882	6.2 miles	Pool, Clubhouse, Reading Room, Laundry Room, Dog Park	Grocery store, shopping center, financial services, medical services



<b>Park Name</b>	<b>Park Location</b>	<b># of Spaces</b>	<b># Homes for Sale</b>	<b>Approx Space Rent</b>	<b>Distance from Park</b>	<b>Park Amenities</b>	<b>Proximity to Services</b>
Sequoia Gardens	433 Fulton Rd, Santa Rosa, Ca 95401, (707) 542-6008	191	3	\$900	3.1 miles	Club House, Game Room, Pool + Spa, Shuffle Board, Social Club, RV Parking	Bus stop, park
Carriage Ct MHP	250 Kawana Springs Rd, Santa Rosa, Ca 95404, (707) 579-0202	74	3	\$910	4.1 miles	Laundry	Bus stop, grocery store, restaurant
Colonial Park	66 Colonial Park Dr, Santa Rosa, Ca 95403, (707) 544-5626	190	7	\$925	4.1 miles	Club House, Pool, Laundry Room	Church, bus stop, market
Shamrock Senior MH Community	6418 Old Redwood Hwy, Santa Rosa, Ca 95403, (707) 838-4389	127	4	\$950	5.3 miles	Pool + Hot Tub, Putting Green, Clubhouse	Bus stop
Country Mobile Estates	1180 Fulton Rd, Santa Rosa, Ca 95401, (707) 542-1808	178	2	\$950	2.7 miles	Pool + Jacuzzi, Billiards Room, Clubhouse, Library, Barbecue	Bus stop
Orchard Mobile Home Park	5379 Old Redwood Hwy, Santa Rosa, Ca 95403, (707) 526-7624	35	2	\$1,000	3.4 miles	Pool, Spa, Tennis Court, Gym, Clubhouse, Game Room	Bus stop, market
Rancho San Miguel MHP	2665 Hardies Ln, Santa Rosa, Ca 95403, (707) 546-6680	141	5	\$1065 - 1165	0.7 miles	Pool, Spa, Club House	Park
MV Estates LLC	2860 Santa Rosa, Santa Rosa, Ca 95407, (707) 546-6713	109	2	\$1,429	4.6 miles	Laundry, Two Parks, Barbecue, Kiddy Park	Bus stop, shopping center, grocery store
The Cottages Of Petaluma	576 N. McDowell Blvd, Petaluma, Ca 94954, (707) 763-1300	178	3	\$1,635	15.6 miles	Pool + Tub, Gym, Library, Clubhouse, Patio w/	Bus stop, grocery store

In addition to the mobile home parks surveyed above, a review of the Multiple Listing Service indicates there were 176 mobile homes for sale within a 50-mile radius of the Santa Rosa City limits at the time of preparation of this Report (See Mobile Homes for Sale at Attachment G). Of those mobile homes for sale, 102 of them were for sale for \$150,000 or less.

## 10.0 Summary of Relocation Options

More than two years has passed since the Park was destroyed by the wildfire and HCD determined the Park to be uninhabitable. During that time, the Tzu Chi Foundation and Burbank Housing Development Corporation have assisted the prior residents with identification of new housing opportunities.

This assistance resulted in 27 prior residents (8 from destroyed resident owned mobile homes, 7 from destroyed park owned mobile homes, 4 from remaining park owned homes and 8 from remaining resident owned mobile homes) being given priority for, and being placed in, affordable housing owned and operated by Burbank Housing Development Corporation and other affordable housing providers. Priority status was extended to prior residents for one year following the wildfire and as many prior residents that expressed interest in, and could qualify for, affordable housing were housed. In addition to placement in affordable housing, prior residents were provided assistance signing up for Section 8 vouchers, which resulted in seven vouchers being awarded. In addition, 41 prior households have now moved into a mobile home and the Tzu Chi Foundation has assisted six individuals to obtain ROC Unmet Needs Committee funding to purchase six replacement mobile homes totaling approximately \$495,000 in assistance.

### Current Living Arrangements of Destroyed Resident Owned Mobile Homes

Since this Report primarily concerns the 88 mobile home owners who owned their mobile homes and were destroyed, the following summarizes the current living arrangements of those 88 mobile home owners.

During the survey and follow-up interviews with prior residents conducted by the Tzu Chi Foundation, information pertaining to the current living arrangements of the 88 mobile homeowners whose mobile homes were destroyed by the wildfire was obtained. At the time of preparation of this Report of the 88 mobile home owners:

- 24 households, or 27%, have either purchased or are renting a mobile home;
- 8 households, or 9%, have moved into affordable housing;
- 14 households, or 16%, are renting an apartment in or near Santa Rosa;
- 12 households, or 14%, have moved out of the area;
- 10 households, or 11%, are living with family/friend;
- 2 households, or 2%, have moved into a care facility;
- 10 households, or 11%, have passed away; and
- 8 households, or 9%, are currently unknown.

### Other Housing Options

According to the research completed for Section 9.0 above, at the time of preparation of this Report, 176 mobile homes in other mobile home parks were available for sale within 50 miles of the City limits. Several of the parks offer mobile home spaces at monthly rates comparable to those of the Park. Purchase of one of those mobile homes using monies available from Housing Assistance Payments provided by the Park Owner, public benefits (FEMA, CDBG-DR, etc.) and/or insurance payouts might be another relocation option. Beyond those properties listed for sale in other mobile home parks, potential opportunities for conventional replacement rental housing were also identified (As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.13; See Available Conventional Housing at Attachment H).

The survey results indicate the majority of the 88 mobile homeowners whose mobile homes were destroyed by the wildfire are currently residing in new living arrangements in mobile homes, affordable housing or apartments or have moved out of the area. Should alternative living arrangements be necessary, the replacement housing analysis revealed there are sufficient housing alternatives available for prior residents to choose from and that there are Housing Assistance Payments provided by the Park Owner, public benefits and/or insurance payouts available to support placement.

## 11.0 Reasonable Relocation Costs

The term "reasonable costs of relocation" is not defined in Government Code Section 65863.7. However, municipalities generally interpret the term to mean the costs of moving the mobile home to a different park. That is the interpretation that at least one court has given after exhaustive review of the legislative history of that section.

As indicated in Section 8.0 above, there are no mobile homes to relocate; therefore, there is no reasonable cost to relocate. Since the wildfire destroyed the resident owned mobile homes, including appurtenant structures and contents of the mobile homes, there is also no reasonable cost to relocate associated with incidental moving expenses (e.g. meals, lodging and incidentals) or costs associated with moving furniture or personal property.

## 12.0 Relocation Plan<sup>14</sup>

Notwithstanding the fact that the wildfire destroyed the Park and the conditions identified under the law do not exist to require payment of formal relocation benefits under federal or state relocation laws, the Park Owner is concerned with the impacts on the prior residents and the difficult life decisions prior residents have had to face as a result of the wildfire. As such, the Park Owner has proposed mitigation measures to assist the 88 mobile home owners who owned their mobile homes, whose homes were destroyed, who resided in the Park immediately prior to the October 2017 wildfire and who have not entered into a Housing

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<sup>14</sup> As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.14.

Assistance Agreement with the Park Owner. The Park Owner has also voluntarily proposed to assist the 24 mobile home tenants who rented their mobile homes from the Park Owner.

The 44 households whose mobile homes were not destroyed by the wildfire have been provided Housing Assistance Payments, have entered into Housing Assistance Agreements with the Park Owner and are not the subject of this Report per Santa Rosa Municipal Code Section 20-28.100.J.8.c.

#### Relocation Plan Participation Requirements

In order for the 88 mobile home owners whose mobile homes were destroyed by the wildfire and the 24 mobile home tenants whose homes were destroyed by the wildfire to be eligible to participate in the Relocation Plan benefits, they must:

1. At all times be in compliance with all local, state, and federal laws and regulations;
2. Be a registered occupant of the Park or legal owner of a destroyed mobile home which lawfully occupied a space in the Park on the Effective Date;
3. Be residing in that same mobile home as the person's only residence on the Effective Date and not be in default of his or her rental agreement with the Park on the Effective Date; and
4. Execute all documents reasonably required by the Park Owner to confirm acceptance of a Housing Assistance Payment, including but not limited to a Housing Assistance Agreement, and cooperate in the implementation of this Report, including the timely provision of documents and other information reasonably required.

A prior resident who resided in a mobile home that was destroyed that meets the above criteria will be considered an "Eligible Resident" for the purposes of receiving a Housing Assistance Payment. If more than one person living in the same mobile home meets the eligibility requirements above, all of the residents of that mobile home, shall collectively be considered a single Eligible Resident under this Report.

An Eligible Resident does not include (a) any current or former Park employee, or their households; (b) any person or persons or their households, who resided in a Destroyed Park Owned Mobile Home immediately prior to the wildfire and who have since passed away; (c) any non-resident owners of destroyed resident owned mobile homes in the Park; and (d) any person who does not accept the benefits offered in the Relocation Plan by the formal closure date of the Park.

Any rights to participate in and accept the Relocation Plan are personal and not assignable, except for those Eligible Residents that owned and occupied their mobile home immediately prior to the wildfire. Eligible Residents may not be in default of their rental agreement and all monies owed to the Park by the Eligible Resident as of the Effective Date must have been paid.

### Relocation Assistance to Eligible Residents

As required by Santa Rosa Municipal Code Section 20-28.100.J.3.c.15, the Park Owner has proposed the following mitigation measures to assist the 88 mobile home owners whose mobile homes were destroyed by the wildfire that are the subject of this Report. The Park Owner has also voluntarily proposed to provide the same assistance to the 24 mobile home tenants who rented their mobile home from the Park Owner. The proposed mitigation measures are as follows:

- The Park Owner will provide Housing Assistance Payments in the amount of \$4,500 to Eligible Residents - an amount equivalent to approximately six months average space rent plus one month rent for security deposit in the Park;
- The Park returned/forgave rent paid/due for the month of October 2017 as well as amounts paid/due for utilities utilized during the month of September 2017; and
- The Park Owner is committed to providing priority to prior qualified residents for any new affordable housing that is built on the Park site, should the Park site be redeveloped in the future.

The 44 households whose mobile homes were not destroyed by the wildfire have been provided Housing Assistance Payments, have entered into Housing Assistance Agreements with the Park Owner and are not the subject of this Report per Santa Rosa Municipal Code Section 20-28.100.J.8.c.

Upon approval of this Report, the Park Owner will enter into Housing Assistance Agreements with each Eligible Resident that sets forth the terms and conditions for assistance, pursuant to the Relocation Plan, and Housing Assistance Payments will be made. These mitigation measures are in addition to the other benefits and compensation outlined in Section 7.0 above that prior residents have received or will receive from other sources (FEMA, insurance, CDBG-DR, private donations, etc.), whether public or private, to compensate for displacement, damage or loss arising from the wildfire. Additional assistance continues to remain available to prior residents through the Tzu Chi Foundation, Legal Aid of Sonoma County, California Rural Legal Assistance, the larger ROC collaborative network and other service providers. Additionally, prior residents will be eligible for the CDBG-DR OOHRRP program anticipated in 2020, which will provide a housing recovery grant of up to \$150,000 per household; Burbank Housing and Tzu Chi Foundation will provide assistance to the prior households to help them qualify for CDBG-DR OOHRRP.

**Attachment A**  
**Statement of Qualifications**



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*Goldfarb & Lipman LLP is a certified women-owned enterprise.*

## INTRODUCTION

Goldfarb & Lipman LLP is a California limited liability partnership, practicing law in the areas of municipal and local government law, environmental law, land use, employment law, affordable housing, fair housing, public finance, leasing, financing, and related areas of law. Since the firm's founding in 1971, we have served as counsel to numerous government agencies. The practice includes all areas of public law required by our clients related to their operations, as well as trial and appellate litigation.

## AFFORDABLE HOUSING

Goldfarb & Lipman has represented hundreds of public agencies and affordable housing developers in creating affordable housing for low and moderate income households. We have helped our clients develop over fifty thousand affordable housing units throughout California, utilizing a wide variety of public and private financing sources.

Our comprehensive services include representation on real estate, tax, finance, land use and fair housing issues in connection with the development of both rental and for-sale affordable housing. We effectively represent our clients on a full-range of affordable housing projects and services, including: rental, cooperative and condominium development, single family subdivision development, self-help housing, and mobile home park conversions. We provide advice with regard to government subsidy programs, inclusionary housing programs, tax syndications and project financing, second mortgage resale restriction programs, and preservation of the affordable housing status of at-risk projects. A list of examples of mobile home projects we have worked can be found in [Exhibit A](#).

Many of our attorneys have worked at the U.S. Department of Housing and Urban Development, and other government agencies, and have direct experience working with, and implementing, the funding programs our clients rely on to develop affordable housing. Goldfarb & Lipman attorneys have also worked as city planners and for nonprofit housing developers and other organizations in the nonprofit sector. This wide range of experiences enables our attorneys to advise clients throughout the process from project conception through operations. We work with clients on initial studies of project feasibility; planning and design; tax structuring, financing, and syndication; construction; initial rent-up; and continuing operations.

## RELOCATION

Goldfarb and Lipman attorneys are well-versed in the complexities of relocation law under both federal and state law, regularly providing trainings and seminars providing both legal and practical experience on implementing relocation programs. Through our work representing public agencies and nonprofit developers involved in land acquisition and rehabilitation transactions, we have implemented programs involving hundreds of separate properties and relocation cases, providing our clients with both the required legal guidance as well as the necessary day to day project management tools to complete their projects on time and on budget. Our relocation work has included preparing relocation and replacement housing plans for development projects as well as closure impact reports related to the closure of mobile home parks and relocation of park residents.



Examples of projects in which we have assisted in the relocation project can be found in Exhibit B.

## FAIR HOUSING

Goldfarb & Lipman is well versed in the latest developments in fair housing and discrimination law, advising clients on rent-up and tenant selection issues, as well as defense of discrimination claims. We are called upon frequently by our public agency and nonprofit clients to provide guidance with issues arising out of the Fair Housing Act, Section 504 of the Rehabilitation Act, Americans with Disabilities Act, and state accessibility laws. We have advised numerous public agency and nonprofit clients on land use and fair housing issues, including drafting reasonable accommodations policies, tenant selection policies and other lease-up documents. Goldfarb & Lipman also works with our public agency clients on fair housing issues, including providing guidance on group home and licensed care facility siting issues, reasonable accommodation policies as they relate to zoning ordinances, and tenant preference policies for publicly administered assistance programs. We also provide day to day advice to clients on implementing tenant selection and reasonable accommodation policies and resolving fair housing and discrimination claims.

## FEDERAL, STATE & LOCAL HOUSING FINANCE PROGRAMS

Goldfarb & Lipman attorneys understand how to implement and utilize the numerous federal, state and local finance programs available for affordable housing. We pride ourselves on our relationships with, and our reputation among, the federal, state and local government agencies responsible for implementing these programs.

Goldfarb & Lipman has experience with HUD-administered programs such as: Section 8 Certificates and Vouchers, Section 202 and 811 programs, VASH vouchers, the Senior Preservation Rental Assistance Contract (SPRAC) program, Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Flexible Subsidy Program, FHA Insured programs such as Sections 221(d)(4), 223(a)(7), 223f and 232, Capital Advance Programs, Housing Opportunities for People with Aids (HOPWA), McKinney Act Homeless Programs, Preservation Programs, Public Housing and Mixed Finance, the Neighborhood Stabilization Program (NSP), and the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) Programs. We also have significant experience working with the Federal Home Loan Bank's Affordable Housing Program.

Goldfarb & Lipman has extensive experience in utilizing programs implemented by the State of California Department of Housing and Community Development (HCD), such as, State CDBG and HOME Program, Multifamily Housing Program (MHP), Rural Predevelopment Loan Program, Emergency Shelter Grant Program, Mobilehome Park Resident Ownership Program (MPROP), Joe Serna Farmworker Grant Program, Affordable Housing and Sustainable Communities Program and Proposition 1C programs (including the Infill Infrastructure Grant Program, and the Transit Oriented Development Housing Program).

Through our representation of cities, counties, and housing authorities we have worked on a wide array of affordable housing programs developed and operated at local levels of government. We have assisted in the creation, development and implementation of such programs as rent relief and deposit assistance programs, housing trust funds to develop

affordable rental housing, and the utilization of multifamily housing revenue bonds and 501(c)(3) bonds.

## LOW INCOME HOUSING TAX CREDITS

Goldfarb & Lipman has structured hundreds of affordable housing projects using federal and state Low Income Housing Tax Credits. Our work in the area of Low Income Housing Tax Credits has influenced industry standards and practice with the development of such provisions as ground lease preferences, nonprofit purchase options, nonprofit purchase discounts, favorable back-end splits, and local government loan forgiveness. We have worked on tax credit syndications involving a variety of investors, including individual corporations, public pooled investment funds, corporate pooled investment funds, and private offerings. As the Low Income Housing Tax Credit program has evolved, our attorneys have continued to remain at the forefront assisting our clients to continue to utilize this effective funding mechanism to create affordable housing. We have represented clients in the structuring of projects utilizing both Low Income Housing Tax Credits and Section 811 financing from the U.S. Department of Housing and Urban Development. We have been actively involved in implementing California's "certificated" state low income housing tax credits.

## LAND USE

We provide a full range of services in land use law, ranging from environmental review to entitlement support to drafting of zoning, subdivision, and other land use ordinances. We have prepared numerous inclusionary and density bonus ordinances for public agency clients, reviewed housing elements and defended them in court, and drafted documents to implement adopted programs, including development agreements, deed restrictions for homebuyers, and covenants for affordable rental housing.

Many of our attorneys have degrees in city planning or related fields or have experience working in local planning agencies. We have made numerous presentations to and written papers for organizations such as the American Planning Association, League of California Cities, and Housing California on a broad range of land use issues, including streamlining environmental review, climate change, housing elements, and density bonus law. We are active in those organizations, and attorneys in the firm have assisted in drafting land use legislation.

### *CEQA Compliance*

We provide ongoing advice to public agency and private clients regarding the environmental review required for public and private projects. We frequently advise on the use of exemptions and existing environmental documents to streamline environmental review. In addition, we review Environmental Impact Reports, negative declarations, and other environmental documents for adequacy, including emerging issues of greenhouse gases, toxic air pollutants, climate change and adaptation, and water supply, and draft findings to support the public agency's decision. Although our goal when working with clients on CEQA issues is to provide the strongest defensible record in the hopes of avoiding the cost and time delays associated with CEQA, we also defend our clients when CEQA challenges are brought, including issues related to the appropriate level of CEQA review as well as the sufficiency of the environmental analysis. We remain at the forefront of recent climate change and other environmental

legislation including SB 375 and understand its effects on the CEQA and development streamlining process.

### *NEPA Compliance*

Many of the firm's clients rely upon federal funding for completion of development projects or require federal project approvals, and the firm's attorneys are familiar with and provide advice to clients on compliance with NEPA as part of obtaining the necessary funding or permits. In that capacity we have advised clients on the necessary level of NEPA review (whether categorical exclusion, FONSI (Finding of No Significant Impact), or EIS (Environmental Impact Statement)); the preparation of the NEPA documents; and the timing of obtaining NEPA review to insure timely funding or issuance of required permits. Several of our attorneys formerly worked for the federal government and understand how the federal agencies apply NEPA review.

## NONPROFIT AND TAX-EXEMPT ORGANIZATIONS

Goldfarb & Lipman represents a broad array of nonprofit and tax-exempt organizations, including nonprofit affordable housing developers, limited equity and stock cooperatives, homeowners' associations, government-affiliated organizations, business improvement districts, community-based health services organizations, schools and other educational organizations, religious organizations, veterans' organizations, and international charities. Goldfarb & Lipman's goal is to provide effective legal services to our nonprofit and tax-exempt clients so that they can focus on their most important goals- fulfilling their organization's mission.

Our practice provides a full spectrum of services to our nonprofit and tax-exempt clients. Given our broad range of nonprofit and tax-exempt clients, as well as our knowledge and expertise of the unique state and federal laws that govern these organizations, we are able to assist our clients at all stages of the organization's existence. Since 1971, we have formed thousands of nonprofit and tax-exempt organizations, and we continue to provide necessary services as these organizations have expanded to meet the ever-increasing demand for their services. Our services include entity formation and assistance in obtaining and maintaining tax-exempt status from the Internal Revenue Service and the Franchise Tax Board. In addition, we assist our clients to obtain property tax exemptions from the State Board of Equalization and County Assessors. We also provide on-going advice and representation on a broad array of issues our clients face, such as conflicts of interest, unrelated business income tax, and completing the numerous state and federal requirements governing tax-exempt organizations. Goldfarb & Lipman often provides advice and legal assistance to nonprofit and tax-exempt organizations in connection with employment and personnel matters.

Our attorneys have conducted numerous conferences, seminars, and trainings on nonprofit and tax-exempt organizations throughout California.

## EXHIBIT A

### SAMPLE OF MOBILEHOME PROJECTS

**Carlsbad.** Goldfarb & Lipman represented a nonprofit housing developer on the development, financing and construction of a 344-unit family rental development. Financing included Low Income Housing Tax Credits, funds from the Federal Home Loan Bank's Affordable Housing Program (AHP), contribution through private for-profit developer as part of the City's inclusionary housing requirements, and three loans and a grant from the redevelopment agency. We also provided legal services to the redevelopment agency in connection with a number of rental and homeownership inclusionary housing developments as well as the purchase by residents of a mobile home park, funded in part by the HCD-administered Mobile Home Resident Ownership Program.

**City of East Palo Alto.** Represented the City of East Palo Alto in the negotiation of a resident acquisition of an approximately 200 space mobile home park including negotiations with the park owner and potential purchasers. Also represented the City in the review and approval of a closure impact report including implementation of the relocation obligations for a mobile home park..

**Colma/Affordable Housing Development.** Representation of a non-profit developer in connection with the acquisition of an existing mobile home park, relocation of the current occupants of the park and redevelopment of the site for affordable housing. The development is located adjacent to a BART Station and was funded, in part, with California Department of Housing and Community Development Transit-Oriented Implementation Program funds. Goldfarb & Lipman worked closely with the developer to prepare the closure impact report, craft a relocation strategy for the mobile home park residents and implement the relocation of the residents after the approval of the closure impact report.

**El Cerrito – Shopping Center.** The Redevelopment Agency acquired a travel trailer/mobile home park to allow for development of a shopping center. The case raised issues as to the loss of goodwill payable to the operator of the mobile home park.

**La Terraza Associates.** We provided legal services to the redevelopment agency in connection with a number of rental and homeownership inclusionary housing developments as well as the purchase by residents of a mobile home park, funded in part by the HCD-administered Mobile Home Resident Ownership Program.

**Limited-Equity Housing Cooperatives.** Goldfarb & Lipman has worked with a nonprofit housing developer on the acquisition of several mobile home parks in Santa Cruz County which were then converted to limited equity housing cooperatives, with the parks owned by the residents. We have also provided ongoing advice to the cooperatives, including relocation advice related to necessary improvements to the parks.

## EXHIBIT B

### SAMPLE RELOCATION PROJECTS

**Alice Griffith Housing Development.** Represented the Housing Authority of the City and County of San Francisco in the demolition of 265 public housing units and the construction and development of over 504 affordable housing units, including the 265 replacement public housing units. Negotiated all of the required documents required for this large multi-phase transaction, including master development agreement, ground leases, reciprocal easements and relocation plan.

**Arroyo Vista.** This development involved disposition and demolition of an existing public housing project consisting of 150 single-family units. Our firm negotiated and drafted the disposition and development agreement, reviewed the relocation plan and environmental clearance documents and defended and successfully settled a lawsuit brought by Legal Aid on behalf of some tenants challenging the Housing Authority's actions.

**Contra Costa County Housing Authority.** The firm assisted the Housing Authority with disposition of an existing public housing development and replacement of the development with new units. Our services included assistance with relocation and HUD disposition requirements, review of architectural and construction contracts, and maintaining HUD operating subsidies.

**East Palo Alto - Gateway Center.** Representation of the redevelopment agency on all aspects of 250,000 square foot “big box” retail center including disposition agreements with five retailers, residential and business relocation and property acquisition, representation of the agency and the City in eminent domain and inverse condemnation cases relating to property acquisition, compliance with hazardous waste laws, and assistance with obtaining land use approvals and subdivision map approvals. Our work included preparation of replacement housing plans and relocation plans for the relocation of over 200 residents.

**East Palo Alto - University Circle.** We represented the East Palo Alto Redevelopment Agency in the negotiation and implementation of a disposition and development and a Government Code Statutory Development Agreement for a 12-acre office and hotel complex. The development required the acquisition of over 40 separate properties and the relocation of 100 residents and 37 businesses. Goldfarb & Lipman created the acquisition plan for the Agency and was responsible for all eminent domain actions involved in the property acquisition as well as providing oversight for the relocation of the residents and businesses. Goldfarb & Lipman also assisted with the implementation of the relocation plan involving both residents and businesses.

**MacArthur BART.** We have provided relocation, structural, tax and financing advice to BRIDGE Housing Corporation in connection with its development of a transit-oriented development at the MacArthur BART Station.

**Mandela Gateway.** The Mandela Gateway mixed-finance project is also a mixed-use project with a separate commercial component consisting of neighborhood-serving retail. This project involved site assembly, condemnation and relocation issues, and homeownership as well as negotiation with HUD, the City of Oakland, Caltrans and other parties to the financing.

**Potrero Terrace and Potrero Annex:** Represented the Housing Authority of the City and County of San Francisco in the demolition of 606 public housing units and the construction and development, in phases, of up to 1700 of affordable housing rental units, market rate rental units and for-sale units. We negotiated all of the required documents required for transaction, including master development agreement, ground leases, reciprocal easements and relocation plan.

**Rosaleda Village.** The Kern County Housing Authority, in conjunction with the nonprofit Wasco Affordable Housing, Inc. (WAHI) and the Wasco Housing Authority has developed Rosaleda Village, a 225 unit development that replaced outdated and poorly located farmworker housing with new units that are located close to schools, parks, and shopping. The development required release of existing restrictions from HUD PIH, USDA RD, and HCD Joe Serna and CDBG and transfer to the new property. In addition, current residents were relocated to the new units in two adjacent properties. Our firm has provided structuring to meet the various eligibility, funding, and timing requirements of the different financing and regulatory authorities. We also have provided representation in real estate, relocation, and syndication issues.

**San Francisco Community College District.** Provided advice on relocation and replacement housing issues related to the disposition of a historic property in Chinatown resulting in the property transferring to a community land trust and a limited equity housing cooperative formed by the residents of the property. We also negotiated joint venture agreements with nonprofit housing developers working with the Mayor's Office of Housing and other financing sources.

**Stockton/Gateway.** Advice to the Stockton Redevelopment Agency on relocation of approximately 150 residents of 4 deteriorated residential hotels; representation of Agency in litigation challenging adequacy of relocation assistance.

**Stockton/Gleason Park.** Assistance to the Stockton Redevelopment Agency in planning for acquisition of 26 properties, providing relocation advice, and preparing the replacement housing plan for a 92-unit affordable housing development.

**Sunnydale/Velasco.** Assistance to the Housing Authority of the City and County of San Francisco in the demolition of 775 public housing units and the construction and development,

in phases, of up to 1700 of affordable housing rental units, market rate rental units and for-sale units. We negotiated all of the required documents required for transaction, including master development agreement, ground leases, reciprocal easements and relocation plan.

**Treasure Island/Relocation Program.** Assistance to a private developer negotiating with the City of San Francisco for development of housing on Treasure Island. Goldfarb & Lipman has worked with the client to design a relocation plan for the existing residents on Treasure Island who will be displaced.

**University of California San Francisco.** Goldfarb & Lipman has provided advice to UCSF on a variety of real estate matters regarding the development of their new facility at Mission Bay in San Francisco. Our work for UCSF has included advice on relocation requirements related to property acquisition and representation on eminent domain matters related to the acquisition of outdoor advertising signs. We drafted guidelines complying with California law. The Relocation Guidelines establish the relocation process and obligations of the University to be followed in land acquisitions requiring the displacement of residents or businesses.

## GOLDFARB & LIPMAN ATTORNEYS

### **M DAVID KROOT**

**Education:** B.A., University of Michigan, Honors Program in Economics. J.D., University of Chicago Law School. **Previous Employment:** Chief Housing Attorney, U.S. Department of Housing and Urban Development (HUD), Office of Area Counsel, San Francisco, California. **Professional and Volunteer Affiliations:** State Bar of California. American Bar Association. Member, Forum on Affordable Housing & Community Development Law of the American Bar Association. Chief Legal Officer, Board of Directors, Tenderloin Neighborhood Development Corporation.

### **LYNN HUTCHINS**

**Education:** B.A., Stanford University. J.D., University of California, Davis, Order of the Coif honors. **Professional & Volunteer Affiliations:** State Bar of California. American Bar Association. Member, Real Property Law Section, Member, Forum on Affordable Housing and Community Development Law. Secretary, California Housing Consortium.

### **KAREN M. TIEDEMANN**

**Education:** A.B., University of California, Berkeley. J.D., Boalt Hall School of Law, University of California, Berkeley, Order of the Coif honors. Associate Editor, Ecology Law Quarterly. Masters in City Planning, University of California, Berkeley. **Professional & Volunteer Affiliations:** State Bar of California, Board member of California Center of Cooperative Development, Board member Merritt Community Capital.

### **THOMAS H. WEBBER**

**Education:** B.A., University of Massachusetts, Amherst. J.D., Golden Gate University School of Law. **Previous Employment:** Assistant to the City Attorney, Office of City Attorney, City of Oakland. Planner, Office of Economic Development and Employment, City of Oakland. **Professional & Volunteer Affiliations:** State Bar of California.



### **DIANNE JACKSON MCLEAN**

**Education:** A.B., University of California, Berkeley. Masters in City Planning, University of California, Berkeley. J.D., University of California, Hastings College of the Law. **Previous Employment:** Associate Planner, City of Daly City. Associate Planner, City of Sacramento. City Planner, City of Emeryville Redevelopment Agency. **Professional & Volunteer Affiliations:** State Bar of California. Standing Committee on the Delivery of Legal Services, State Bar of California. Member, Real Property Law Section. Member, Charles Houston Bar Association. Member, National Bar Association. American Bar Foundation, Fellow. American Bar Association. Member, California Association of Black Lawyers.

### **MICHELLE D. BREWER**

**Education:** B.A., Harvard University, honors. Masters in Public Affairs, Princeton University. J.D., Harvard University Law School. **Previous Employment:** Deputy City Attorney, City and County of San Francisco. **Professional & Volunteer Affiliations:** State Bar of California. Member, Real Property Law Section of the State Bar of California. American Bar Association. Member, Forum on Affordable Housing and Community Development Law.

### **JENNIFER K. BELL**

**Education:** B.A., Wellesley College, honors. J.D., Harvard University Law School. **Previous Employment:** Deputy General Counsel, San Francisco Redevelopment Agency. Deputy City Attorney, City of Oakland. Attorney, U.S. Department of Housing and Urban Development. Staff Attorney, Legal Aid Society of Alameda County. **Professional and Volunteer Affiliations:** State Bar of California, Real Property Law Section. Black Women Lawyers of Northern California. Member, East Bay Housing Organizations. Former Board Member, Merritt Community Capital Corporation and the Low Income Housing Fund.

### **ROBERT C. MILLS**

**Education:** B.A., California State University, Northridge, *cum laude*. J.D., Hastings College of the Law. Associate Articles Editor, Communications and Entertainment Law Journal. **Previous Employment:** Staff Attorney, U.S. Department of Housing & Urban Development, Office of Counsel, Pacific/Hawaii Area. **Professional & Volunteer Affiliations:** State Bar of California. Member, National Association of Housing and Redevelopment Officials.

### **ISABEL L. BROWN**

**Education:** B.S.E. in Civil Engineering and Certificate in Architecture, Princeton University, *cum laude*. Masters degree in Architecture, University of California, Berkeley. J.D., Boalt Hall School of Law, University of California, Berkeley. Articles Editor, Ecology Law Quarterly. Sadie & Alvin Landis Prize in Local Government Law. **Previous Employment:** Legislative Assistant, U.S. House of Representatives. Assistant Architect, City of New York, Department of Housing, Preservation & Development. **Professional & Volunteer Affiliations:** State Bar of California.

### **JAMES T. DIAMOND**

**Education:** B.A., University of San Francisco, *cum laude*. J.D., Hastings College of the Law.  
**Professional & Volunteer Affiliations:** State Bar of California. State Bar of California. American Bar Association, Employment Law Section. Alameda County Bar Association Labor & Employment Law Section, Executive Committee Member. Oakland African American Chamber of Commerce.

### **MARGARET F. JUNG**

**Education:** B.A., University of California, Los Angeles, *magna cum laude*, Phi Beta Kappa. J.D., Boalt Hall School of Law, University of California, Berkeley. **Previous Employment:** Public Accountant, Ernst & Young, LLP. **Professional & Volunteer Affiliations:** State Bar of California, Business Law and Taxation Sections. Certified Public Accountant (inactive), California Board of Accountancy. Board of Directors, Chinatown Community Development Center. Member, National Coalition for Asian Pacific American Community Development.

### **HEATHER J. GOULD**

**Education:** B.A., Carleton College, *magna cum laude*, Northfield, Minnesota. J.D., Boalt Hall School of Law, University of California, Berkeley. **Professional & Volunteer Affiliations:** State Bar of California.

### **WILLIAM F. DICAMILLO**

**Education:** B.A., State University of New York, Buffalo, *magna cum laude*. Phi Beta Kappa. J.D., University of California, Los Angeles. **Previous Employment:** Travelers Aid Society of Alameda County, Case Manager. **Professional & Volunteer Affiliations:** State Bar of California. State Bar of New York.

### **AMY DeVAUDREUIL**

**Education:** B.A., University of Rhode Island, Highest Honors, Phi Beta Kappa. J.D., Boalt Hall School of Law, University of California, Berkeley. **Professional and Volunteer Affiliations:** State Bar of California, Real Property and Taxation Sections. American Bar Association, Forum on Affordable Housing and Community Development. Board Member, San Diego Housing Federation.

### **BARBARA E. KAUTZ**

**Education:** B.A., *cum laude*, Phi Beta Kappa, Stanford University. Masters of City Planning, University of California, Berkeley. J.D., *summa cum laude*, University of San Francisco. U.S.F. Law Review Articles Editor. **Previous Employment:** Community Development Director & Assistant City Manager, City of San Mateo, California. Planning Director, Town of Corte Madera, California. **Professional & Volunteer Affiliations:** State Bar of California. American Bar Association, Section on State and Local Government. Fellow, American Institute of Certified Planners. Member, Urban Land Institute. Member, Association of Environmental Professionals.

### **ERICA WILLIAMS ORCHARTON**

**Education:** B.A., Occidental College. J.D., University of Southern California Law School (Member, Interdisciplinary Law Journal; Invitee, Hale Moot Court; Recipient, Adam Freeman Scott Memorial Grant). **Previous Employment:** Affordable Housing Associates, Berkeley, CA, Director of Operations. **Professional and Volunteer Affiliations:** State Bar of California. Former Board Member, Satellite Affordable Housing Associates.

### **LUIS A. RODRIGUEZ**

**Education:** B.A., Sociology University of California, Los Angeles. M.A., Social Sciences, University of Chicago. J.D. from University of California, Los Angeles, School of Law. Drown Fellowship, Public Interest Law Fellowship, Managing Editor of the *Chicano-Latino Law Review*. **Previous Employment:** Staff Attorney, Economic Development Unit, Legal Aid Foundation of Los Angeles. **Professional & Volunteer Affiliations:** State Bar of California. Board Member, East Bay Housing Organizations.

### **RAFAEL YAQUIAN**

**Education:** B.S., Community and Regional Development, University of California, Davis. M.A., Urban Planning, University of California, Los Angeles. Jesse Marvin Unruh Assembly Fellow, California State University of Sacramento Center for California Studies. J.D., University of California, Los Angeles, Epstein Program in Public Interest and Law Policy. **Professional & Volunteer Affiliations:** State Bar of California, Real Property and Taxation Sections. American Bar Association. Member, Forum on Affordable Housing and Community Development Law.

### **CELIA W. LEE**

**Education:** B.A., *magna cum laude*, *Phi Beta Kappa*, University of California, Berkeley. J.D., University of Michigan Law School. **Previous Employment:** Deputy City Attorney, Office of the City Attorney for the City and County of San Francisco. **Professional & Volunteer Affiliations:** State Bar of California. State Bar of New York. Chair, Board of Trustees for Chinese for Affirmative Action/Asian Americans for Civil Rights and Equality (CAA/AACRE). Member, Board of Directors, San Francisco Conservation Corps. Member, Lawyers' Committee for Civil Rights for the San Francisco Bay Area. Past President, Asian American Bar Association of the Greater Bay Area.

### **DOLORES BASTIAN DALTON**

**Education:** B.A., Philosophy, University of California at Berkeley. J.D., University of San Francisco School of Law. Comments Editor of the Law Review. **Professional & Volunteer Affiliations:** State Bar of California. Member, The Mediation Society. Member, State Bar of California Litigation Section. Member, Appellate Mediation Panels, CA Court of Appeal, Third and Sixth Districts. Ms. Dalton has been certified by the State Bar of California as specialist in appellate law. Ms. Bastian Dalton is an adjunct professor at the University of San Francisco School of Law.

### **JOSHUA J. MASON**

**Education:** B.A., *cum laude*, University of California, Los Angeles. UCLA Community Service Commission Project Director of the Year. Distinguished Bruin Award. Chancellor's Service Award. Charles E. Young Humanitarian Award. Masters in City Planning, University of

California, Berkeley. J.D., University of California, Hastings College of the Law. PILP Pro Bono Publico Award. PIC Public Interest Law Certificate. Imelda Rosenthal Bar Scholarship. Equal Justice Works Summer Corps. **Previous Employment:** Staff Attorney, US Department of Housing and Community Development. **Professional & Volunteer Affiliations:** State Bar of California.

#### **ELIZABETH R. KLUECK**

**Education:** B.A., *cum laude*, University of California, Berkeley. J.D., University of California, Davis. The Order of Barristers; CEB/UC Award for Excellence in Legal Writing; Competitions Chair, UC Davis Moot Court Board; Executive Board of Directors, King Hall Legal Foundation; American Inns of Court Scholarship Recipient; Finalist, Martin Luther King, Jr. Public Service Award. **Professional & Volunteer Affiliations:** State Bar of California.

#### **JEFFREY A. STREIFFER**

**Education:** B.A., Earlham College, *phi beta kappa*. J.D., Hamline University School of Law. **Previous Employment:** Senior Counsel, US Department of Agriculture; Board Member, SPIRE Credit Union. **Professional & Volunteer Affiliations:** State Bar of California; State Bar of Minnesota; American Bar Association; Legal Consultant, LegalCORPS; Bankruptcy Attorney, Volunteer Lawyers Network.

#### **JHAILA R. BROWN**

**Education:** B.A., University of California, Berkeley. J.D., University of San Francisco School of Law. **Previous Employment:** Deputy County Counsel IV, County of Riverside; Deputy City Attorney, Calabasas, California. **Professional & Volunteer Affiliations:** State Bar of California; Housing and Development Law Institute, County Counsels' Association of California.

#### **ERIK RAMAKRISHNAN**

**Education:** B.S., Northern Michigan University, *summa cum laude*. M.S., Walden University. J.D., Santa Clara University School of Law, *summa cum laude*. ALI-ABA Scholarship and Leadership Award; Justice John Paul Stevens Fellowship; Witkin awards; Best Brief award in Appellate Advocacy section. **Previous Employment:** Deputy City Attorney for the City of Fremont; Deputy County Counsel for Kings County. **Professional & Volunteer Affiliations:** State Bar of California, League of Cities, Brown Act Committee member, reviewer for 2018 and 2019 editions of Municipal Law Handbook.

#### **RYE P. MURPHY**

**Education:** B.A., University of Oregon. Center for Arab and Middle Eastern Studies, American University of Beirut. J.D., University of California, Hastings College of Law. Hastings International & Comparative Law Review, Articles Editor; CALI Award, Constitutional Law. **Professional & Volunteer Affiliations:** State Bar of California.

#### **JUSTIN D. BIGELOW**

**Education:** B.A., Macalester College, Saint Paul, Minnesota, honors thesis. Masters in City Planning, University of California, Berkeley. J.D., *cum laude*, University of California, Hastings

College of the Law. Co-author, Best Brief, Justice Baxter Moot Court Competition; Co-Vice President, Hastings Public Interest Law Foundation; National Semifinalist, PACE Environmental Law Moot Court Competition Co-Author, Best Brief at the Justice Baxter Moot Court Competition; Co-Vice President, Hastings Public Interest Law Foundation; National Semifinalist, PACE Environmental Law Moot Court Competition. **Previous Employment:** Mediator, Attorney General's Office of Minnesota. **Professional and Volunteer Affiliations:** State Bar of California. Member, Board of Directors, Livable City.

**AILEEN NGUYEN**

**Education:** B.A., *phi eta sigma*, Emory University, Atlanta, Georgia. J.D., Georgetown University Law Center. **Professional and Volunteer Affiliations:** State Bar of California.

**KATIE DAHLINGHAUS**

**Education:** A.B., Harvard University. J.D., University of California, Berkeley, School of Law. **Previous Employment:** Law Clerk, United States Department of Agriculture; Program Manager, LifeMoves. **Professional and Volunteer Affiliations:** State Bar of California.

**Attachment B**  
**California Govt. Code §65863.7 & Santa Rosa Municipal Code 20-28.100.J**

**California Government Code §65863.7**

(a) Prior to the conversion of a mobilehome park to another use, except pursuant to the Subdivision Map Act (Division 2 (commencing with Section 66410) of Title 7), or prior to closure of a mobilehome park or cessation of use of the land as a mobilehome park, the person or entity proposing the change in use shall file a report on the impact of the conversion, closure, or cessation of use upon the displaced residents of the mobilehome park to be converted or closed. In determining the impact of the conversion, closure, or cessation of use on displaced mobilehome park residents, the report shall address the availability of adequate replacement housing in mobilehome parks and relocation costs.

(b) The person proposing the change in use shall provide a copy of the report to a resident of each mobilehome in the mobilehome park at least 15 days prior to the hearing, if any, on the impact report by the advisory agency, or if there is no advisory agency, by the legislative body.

(c) When the impact report is filed prior to the closure or cessation of use, the person or entity proposing the change shall provide a copy of the report to a resident of each mobilehome in the mobilehome park at the same time as the notice of the change is provided to the residents pursuant to paragraph (2) of subdivision (g) of Section 798.56 of the Civil Code.

(d) When the impact report is filed prior to the closure or cessation of use, the person or entity filing the report or park resident may request, and shall have a right to, a hearing before the legislative body on the sufficiency of the report.

(e) The legislative body, or its delegated advisory agency, shall review the report, prior to any change of use, and may require, as a condition of the change, the person or entity to take steps to mitigate any adverse impact of the conversion, closure, or cessation of use on the ability of displaced mobilehome park residents to find adequate housing in a mobilehome park. The steps required to be taken to mitigate shall not exceed the reasonable costs of relocation.

(f) If the closure or cessation of use of a mobilehome park results from the entry of an order for relief in bankruptcy, the provisions of this section shall not be applicable.

(g) The legislative body may establish reasonable fees pursuant to Section 66016 to cover any costs incurred by the local agency in implementing this section and Section 65863.8. Those fees shall be paid by the person or entity proposing the change in use.

(h) This section is applicable to charter cities.

(i) This section is applicable when the closure, cessation, or change of use is the result of a decision by a local governmental entity or planning agency not to renew a conditional use permit or zoning variance under which the mobilehome park has operated, or as a result of any other zoning or planning decision, action, or inaction. In this case, the local governmental agency is the person proposing the change in use for the purposes of preparing the impact report required by this section and is required to take steps to mitigate the adverse impact of the change as may be required in subdivision (e).

(j) This section is applicable when the closure, cessation, or change of use is the result of a decision by an enforcement agency, as defined in Section 18207 of the Health and Safety Code, to suspend the permit to operate the mobilehome park. In this case, the mobilehome park owner is the person proposing the change in use for purposes of preparing the impact report required by this section and is required to take steps to mitigate the adverse impact of the change as may be required in subdivision (e).

ORDINANCE NO. ORD-2019-013

URGENCY ORDINANCE OF THE COUNCIL OF THE CITY OF SANTA ROSA  
AMENDING TITLE 20 OF THE SANTA ROSA CITY CODE, SECTION 20-28.100,  
RESILIENT CITY (-RC) COMBINING DISTRICT, TO ADD MOBILE HOME PARK  
CLOSURE PROCEDURES FOR MOBILE HOME PARKS OF THE CITY OF SANTA ROSA  
MOST SEVERELY IMPACTED BY THE TUBBS AND NUNS FIRES OF OCTOBER 2017

WHEREAS, beginning on the evening of October 8, 2017, and continuing for days thereafter, a series of wildfire events, identified as the Tubbs and Nuns Fires (Fires) burned over 90,000 acres in Sonoma County and damaged or destroyed approximately 3000 homes and 100 commercial structures within the boundaries of the City of Santa Rosa; and

WHEREAS, on October 9, 2017, the City Manager, in his capacity as Director of Emergency Services, proclaimed the existence of local emergency in the City of Santa Rosa; and

WHEREAS, on October 9, 2017, the Governor of the State of California proclaimed a State of Emergency for Sonoma and other counties; and

WHEREAS, on October 10, 2017, President Donald J. Trump declared the existence of a major disaster in the State of California and ordered Federal aid to supplement State and local recovery efforts in the areas affected by wildfires, beginning on October 8, 2017; and

WHEREAS, on October 13, 2017 the City Council adopted Resolution No. RES-2017-201 ratifying the City Manager's proclamation of the existence of a local emergency; and

WHEREAS, the Council recognizes the urgent need to rebuild and repopulate those areas affected by the Fires and has identified several measures by which the process could be expedited and facilitated; and

WHEREAS, Government Code Section 36937(b) allows an ordinance to take effect immediately, if it is an ordinance for the immediate preservation of public peace, health or safety and it contains a declaration of the facts constituting the urgency; and

WHEREAS, Section 8 of the Santa Rosa City Charter authorizes the City Council to adopt an urgency measure to take effect immediately upon its adoption if necessary to preserve the public peace, health or safety if such ordinance contains the reasons for its urgency; and

WHEREAS, such an urgency measure requires a five-sevenths vote of the City Council for adoption; and

WHEREAS, as provided herein, the Ordinance shall be in effect immediately upon its adoption; and

WHEREAS, the proposed Zoning Code Amendment to add Section 20-28.100(J), Mobilehome Park Conversions, to Title 20 (Zoning) is consistent with the goals and policies of

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all elements of the General Plan, and any applicable specific plan in that adding Section 20-28.100(J) to the Santa Rosa City Code, as follows, exercises the land use powers of the City to protect the health, safety and welfare of the public which would be put at risk if fire-damaged neighborhoods were not quickly repaired and repopulated; and

WHEREAS, the proposed amendment would not be detrimental to the public interest, health, safety, convenience, or welfare of the City in that it will provide a means by which to restore portions of the City damaged by the Fires; and

WHEREAS, the proposed amendment is internally consistent with other applicable provisions of this Zoning Code, in that the amendment will implement the General Plan through standards for zoning districts already adopted into the Zoning Code; and

WHEREAS, adoption of this Ordinance is exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21080(b)(3) regarding repairs and replacement work after a state-declared disaster and Section 21080(b)(4) regarding actions to mitigate or prevent an emergency, and CEQA Guidelines Section 15269(a) regarding maintaining, repairing, restoring, demolishing, or replacing property or facilities damaged or destroyed as a result of a disaster in a disaster stricken area in which a state of emergency has been proclaimed by the Governor pursuant to the California Emergency Services Act, commencing with Section 8550 of the Government Code, and Section 15269(c) regarding specific actions necessary to prevent or mitigate an emergency; and

WHEREAS, adoption of this Ordinance is exempt from CEQA review as it is not a “project” pursuant to CEQA Guidelines section 15378; and

WHEREAS, adoption of this Ordinance is exempt under the “common sense exemption” set forth in CEQA Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects having the potential to cause a significant effect on the environment, “where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” The proposed project would amend the City’s Zoning Code to refine the process for preparation of and consideration of relocation impact reports. The proposed Zoning Code amendments would not in and of themselves allow the development of any new structures or alteration of lands; rather, any future projects resulting from the closure of a mobile home park would require their own entitlement permit and CEQA review process; and

WHEREAS, the City Council has been provided with information upon which the findings and actions set forth in this Ordinance are based, allowing the Council to adopt this urgency ordinance to be effective upon adoption; and

WHEREAS, for the reasons set forth above, this Ordinance is declared by the City Council to be necessary for preserving the public peace, welfare, health or safety and to avoid a current, immediate and direct threat to the peace, health, safety or welfare of the community and the recitals above taken together constitute the City Council’s statement of the reasons for adopting this Ordinance on an urgency basis.

THE PEOPLE OF THE CITY OF SANTA ROSA DO ENACT AS FOLLOWS:

Section 1. The Council finds, based on evidence and records presented, that this Ordinance is necessary for the protection of the public peace, health and safety.

Section 2. The proposed amendment is internally consistent with other applicable provisions of this Zoning Code, in that the amendment will implement the General Plan through standards for zoning districts already adopted into the Zoning Code.

Section 3. Amend Section 20-28.100, Resilient City (-RC) Combining District, to add a new subsection 'J' to address mobile home park closure procedures, to read and provide as follows:

"J. Mobilehome Park Conversions. City Code Chapter 6-67, Mobilehome Park Conversions, has specific requirements related to the conversion/closure of a mobile home park. These requirements do not address the closure of a mobile home park following a catastrophic natural disaster event such as the Tubbs and Nuns Fires of 2017 (the Fires). Mobilehome Parks that (1) are located within the -RC Combining District and (2) lost over 50% of their total units as a result of the Fires, may apply either the standards set forth in Chapter 6-67 or the standards set forth below, which ever is less restrictive, for preparation of a relocation impact report related to conversion/closure of a Mobilehome Park:

1. Findings and purpose.

- a. Government Code Sections 65863.7 and 66427.4 and Civil Code Section 798.56, authorize the City to require an impact report and mitigation measures as a condition of conversion of an existing mobilehome park to another use or closure of a mobilehome park or cessation of use of land as a mobilehome park or the filing of a subdivision map application connected with a conversion of use for a mobilehome park.
- b. The Council finds that unless mitigation measures are undertaken, the conversion, closure or cessation of use of mobilehome parks would have a substantial adverse effect upon park residents in terms of cost of relocation, scarcity of similar comparable housing within a reasonable proximity to the City, and the significantly higher costs of other types of housing in the immediate area if park residents cannot relocate to other mobilehome parks. Mobilehomes cannot be easily relocated due to the age of the homes, the cost of moving and relocation and the scarcity of vacant spaces in the vicinity. When a mobilehome in an existing park is sold, it is generally sold in place and not often moved from its location. Mobilehome owners have invested substantial sums in the acquisition, installation and maintenance of their mobilehomes. For most residents, these homes represent the owner's principal financial asset. One direct result of a change of use of a mobilehome park, unless mitigated, can be the destruction of the value of the mobilehome and difficulty in finding adequate replacement housing. Relocating park residents

to an area in excess of 50 miles from their existing home creates special hardships, particularly for elderly residents, who need to be in proximity to their family, caregivers, medical care providers and social service support networks. A move in excess of 50 miles would disrupt these support resources, would jeopardize the jobs of those residents currently employed and would not constitute adequate replacement housing for such residents.

- c. It is the purpose of the City Council in adopting this section to establish reasonable regulations in accordance with the authority granted by State law to mitigate the adverse effects of relocation upon mobilehome park residents who are confronted with a proposed change of use for their mobilehome park.
- d. It is the purpose of the City Council in adopting this section to establish uniform procedures and standards for reasonable relocation benefits and assistance in the case of a conversion, closure or cessation of use of a mobilehome park so as to implement State law and so that the owners of mobilehome parks understand their rights and responsibilities. The requirements of this section are in addition to all other land use regulations which are applicable.

## 2. Definitions.

As used in this section:

- a. "Applicant" means the person, firm, entity or corporation applying for any conversion, change of use, closure, or cessation of use of land as a mobilehome park. If the owner of the controlling interest in a mobilehome park is not the applicant, then the applicant must provide evidence of the controlling owner's consent to the filing of the application.
- b. "Housing specialist" means a person with expertise in assisting mobilehome owners and tenants in searching for replacement housing, in the valuation of housing, including mobilehomes, and in determining the reasonable cost of relocation.
- c. "Mobilehome owner" means a person who owns and occupies a mobilehome within a mobilehome park as a primary residence.
- d. "Mobilehome park" or "park" means any area of land within the City of Santa Rosa where two or more mobilehome spaces are rented, or held out for rent, to accommodate mobilehomes used for human habitation.
- e. "Occupant" or "occupy" means either (i) a person who resides within a mobilehome park at the time of preparation of the relocation impact report or (ii) where a mobilehome park or portion thereof is rendered uninhabitable due

to a man-made or natural disaster, a person who resided in a mobilehome immediately prior to the disaster.

- f. "Tenant" means a person who occupies a mobilehome within a mobilehome park pursuant to a bona fide lease or rental agreement with the mobile home park owner and who, during his or her tenancy, is not the owner or member of the immediate household of the owner of the mobilehome.

3. Relocation impact report required.

- a. Any person who files an application with the City for a general plan amendment, rezoning, tentative map, conditional use permit or any other application for the purpose of converting a mobilehome park to a condominium, stock cooperative, or any other form of ownership wherein mobilehome spaces within the park are to be sold for residential use, or to change to another use, and any person who decides to close a mobilehome park or cease to use the land as a mobilehome park, shall file with the City a relocation impact report that complies with this section. No application shall be complete until the relocation impact report is filed. If the relocation impact report is prepared in anticipation of closing a mobilehome park and no other applications are filed with the City, only the relocation impact report shall be required to be submitted to the City.
- b. The relocation impact report shall be prepared by a consultant qualified to prepare the relocation impact report. The applicant shall be responsible for the selection of the consultant and all costs incurred in the preparation of the relocation impact report.
- c. Once the applicant has selected the consultant, the applicant shall notify the mobile home owners and tenants within 15 days that the relocation impact report is being prepared. The relocation impact report shall contain the following information:
  - (1) A legal description of the property;
  - (2) A map and a detailed description of the condition of the mobilehome park, including the nature and location of structures, landscaping, easements, utilities and other on-site improvements existing at the time of the preparation of the relocation impact report;
  - (3) The names and addresses of all mobilehome owners and tenants occupying the park (including absentee mobilehome owners), as shown on the rental agreement for the mobilehome park spaces, to the extent such information is readily available to the applicant;
  - (4) The date of manufacture of each occupied mobilehome within the park, the model and trade name of the mobilehome, length and

width, number of bedrooms, and number identifying the mobilehome space being occupied, to the extent that such information is readily available to the applicant. No listing is required for mobilehome(s) owned by park owner, mobile homes that were destroyed as a result of a disaster or that have been removed from the mobilehome park prior to the preparation of the relocation impact report;

- (5) The number of spaces within the park, length of occupancy by the current occupant of each space and the current rent and utilities for each space, if the space is occupied and if the information is readily available to the applicant;
- (6) The total number of mobilehome owners and tenants occupying each space, identifying owner or renter occupancy and whether the mobilehome is the principal residence of the owner, if the space is occupied and if the information is readily available to the applicant;
- (7) A description of the proposed new use and all discretionary approvals necessary therefor, if applicable;
- (8) The proposed timetable for conversion, closure or cessation of use of the land as a mobilehome park and for obtaining other discretionary approvals for the proposed use, if applicable;
- (9) The location of all comparable mobilehome parks within a 50-mile radius from the City limits, including the mobilehome park name, number of lots, number of vacancies, rent including utilities, policies, and restrictions on type of mobilehomes and residents accepted, amenities offered and proximity to services (bus stops, grocery stores, hospitals, etc.);
- (10) A determination based on the information provided in subsections (c)(4), (5) and (9) of this section of the total number of occupied mobilehome units that are eligible to be relocated to a comparable mobilehome park, if any, provided, however, such information shall not be required for any mobilehomes that were destroyed as a result of a disaster, have been moved from the mobilehome park prior to the preparation of the report, or are owned by the mobilehome park owner;
- (11) The estimated cost of relocating the mobilehomes identified in subsection (c)(10) of this section, if any, to available lots in mobilehome parks within the 50 mile radius. The cost of relocating shall include the costs of dismantling, packing, moving, reassembling, rebuilding and unpacking, as necessary, the mobilehome, all personal property, skirting, tie-downs and all other associated structures and property;
- (12) An estimate of the fair market value and the replacement value of each mobilehome owned by a mobilehome owner and located in

the park and all associated fixed property that cannot be relocated to a comparable mobilehome park, provided, however, such information shall not be required for any mobilehomes that were destroyed as a result of a disaster or have been moved from the mobilehome park prior to the preparation of the report. In determining fair market value and the replacement value, the consultant shall consider the mobilehomes in their current locations assuming the continuation of the mobilehome park in a safe, sanitary and well maintained condition with competitive lease rates. The consultant shall specify the basis for a conclusion that any mobilehome cannot be relocated to a mobilehome park and the basis for determining the value of the mobilehomes;

- (13) The availability and cost of rental housing of comparable size and quality within a 50-mile radius of the City limits for each mobilehome park tenant;
- (14) A relocation plan, including a timetable for physically relocating the mobilehomes remaining in the mobilehome park as of the date of the relocation plan, other than those owned by the mobilehome park owner, payment of relocation assistance and purchase of mobilehome, if any;
- (15) Proposed measures to mitigate the adverse impacts of the conversion upon the mobilehome owner as required in Section J(9);
- (16) A list of persons, agencies, firms and organizations with proven expertise in the fields of housing and relocation of persons displaced from housing. This list shall include the names, addresses, telephone numbers, and fee schedules of persons who are qualified as mobilehome movers and appraisers of mobilehomes. The information shall include an explanation of the services available to both mobilehome owners and tenants which the housing specialists can provide; and
- (17) Any information which the Department of Community Development determines is necessary to address the specific issues raised by the application or the relocation impact report and any information that may be necessary to implement provisions of this section.

4. Notice and information meeting.

- a. Not less than 15 days prior to a public hearing before the City Council, the applicant shall transmit to each mobilehome owner and tenant occupying a mobilehome within the mobilehome park, a copy of the relocation impact report, a copy of this section, and notices of the dates, times and places of the public hearings and the informational meeting to be held pursuant to subsection (b) of this section.

- b. Not less than 14 days prior to the public hearing before the City Council, the applicant shall conduct not less than one informational meeting for the mobilehome owners and tenants of the mobilehome park regarding the status of the application for change of use and/or closure, the timing of the proposed relocation of mobilehome owners, and the nature of the relocation benefits the park owner proposes to make available, if any. A housing specialist(s) designated in the relocation impact report shall be present at such meeting, if the relocation impact report is required to identify a housing specialist.
5. Notice to new residents. When an application or relocation impact report has been filed, the park owner shall advise each prospective new resident who proposes to occupy a mobilehome within the park in writing, prior to the execution of a rental agreement or commencement of such occupancy, whichever occurs first, that the application has been filed.
6. Bankruptcy exemption. The provisions of this section shall not apply if it is determined that the closure of a mobilehome park or cessation of use of the land as a mobilehome park results from an adjudication of bankruptcy.
7. Hearing on relocation impact report. The City Council shall hold a public hearing on the adequacy of the relocation impact report for all applications described in Section J(3) and all filed relocation impact reports. Following the close of a hearing, the City Council may require as a condition to any application or determination of adequacy of the relocation impact report if there is no application, that the applicant take steps to mitigate the adverse impacts of the change of use, closure of the mobilehome park or cessation of use of the land as a mobile home park on the mobilehome owners and tenants, if any. The cost of such conditions shall not exceed the reasonable cost of relocation, after deducting any compensation or benefits received by the mobilehome owners and tenants from other sources, whether public or private, to compensate the mobilehome owners and tenants for displacement, damage or loss arising from the disaster.
8. Determination and conditions: relocation assistance.
  - a. The City Council shall determine as to applications described in Section J(3) what conditions are necessary to mitigate the adverse impact on the mobilehome owners' ability to find adequate housing and may impose such conditions upon any required approval of any such application. The cost of such conditions shall not exceed the reasonable cost of relocation after deducting any compensation received by the mobilehome owner or tenant from other sources to compensate the mobilehome owner or tenant for displacement or damage arising from the disaster, including but not limited to insurance proceeds, federal emergency management aid, other governmental assistance, assistance provided by the owner and aid provided by philanthropic entities.

b. The specific conditions of approval of an application or determination of adequacy of the relocation impact report if there is no application, shall be determined by the City Council with regard to the facts and circumstances of the particular application and may include:

- (1) Payment of relocation assistance to each mobilehome owner who occupies a mobilehome in the mobilehome park on and after the date the application or relocation impact report is filed or an earlier or later date established by the City Council;
- (2) Payment of the cost of physically moving the occupied mobilehomes to a new site, including tear-down and setup of movable improvements such as patios, carports and porches, utility hookups; packing, moving and unpacking all personal property; and in-transit costs for meals, lodging and gas, if the mobilehomes are still located in the mobilehome park and not owned by the mobilehome park owner as of the date of the relocation impact report;
- (3) Payment to each mobilehome owner or tenant who resides in the mobilehome park on or after the date the application or relocation impact report is filed of a lump sum to compensate for payment of the first and last months' rent and any security deposit at the new mobilehome park or other acceptable rental housing;
- (4) Payment to each mobilehome owner or tenant who resides in a mobilehome in the mobilehome park on or after the date the application or relocation impact report is filed of a lump sum to compensate for any differential between rental rates at the closing mobilehome park and the new mobilehome park or other acceptable rental housing during the first year of the new tenancy;
- (5) Payments of all reasonable expenses incurred in moving to a new location, up to a maximum distance of 50 miles;
- (6) For mobilehome owners who are unable to reasonably relocate their mobilehome, payment for their mobilehome based on information contained in the approved relocation impact report, if the mobilehome remains in the mobilehome park as of the date of the relocation impact report;
- (7) Setting aside a certain number of affordable units for the mobilehome owners or tenants of the park, if the park is to be converted to another residential use; or providing a certain number of affordable units off-site, if the park is to be converted to a use other than residential.

c. Notwithstanding anything set forth above, if the mobilehome owners or tenants and the applicant or mobilehome park owner have reached agreement on mutually satisfactory compensation or other benefits to address the impacts of the closure or change of use on the mobilehome



owners or tenants, such agreements shall be deemed adequate for purposes of the relocation impact report.

9. Obligation of applicant.

a. After the date of approval of the relocation impact report, the applicant shall:

(1) Use its best efforts so that not later than 30 days from the approval, the housing specialist(s), if one is required, makes personal contact with each mobilehome owner and tenant of the mobilehome park who has not reached an agreement with the applicant or mobilehome park owner and commence consultation to determine the proper relocation assistance to be provided, if any. The housing specialist shall give each mobilehome owner or tenant eligible to receive relocation assistance written notice of his or her relocation assistance;

(2) Not later than four months from the approval, allow mobilehome owners and tenants eligible to receive relocation assistance, who are entitled to make selections between alternate benefits to make such selection in writing. The alternate benefits selected shall be submitted to the applicant on a form provided by the housing specialist;

b. The date upon which any mobilehome owner or tenant is required to vacate such park or upon which the owner of any mobilehome is required to remove the mobilehome from the mobilehome park shall be not less than six months from the date of notice of termination of tenancy and not less than 35 days from the date of payment of any relocation benefits required by the approved relocation impact report, if the mobilehome owner or tenant still retains tenancy rights in the mobilehome park.

c. No building permit shall be issued for development unless and until the applicant files a statement with the Planning and Economic Development Department made under penalty of perjury, that all relocation assistance payments required by the approved relocation impact report have been paid.

10. Administration fee. The City Council may establish by resolution reasonable fees paid by the applicant to cover any costs incurred by the City in implementing this section.”

Section 4. Environmental Determination. The Council finds that:

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A. The adoption and implementation of this ordinance is exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21080(b)(3) regarding repairs and replacement work after a state-declared disaster and Section 21080(b)(4) regarding actions to mitigate or prevent an emergency, and CEQA Guidelines Section 15269(a) regarding maintaining, repairing, restoring, demolishing, or replacing property or facilities damaged or destroyed as a result of disaster within a disaster stricken area in which a state of emergency has been proclaimed by the Governor pursuant to the California Emergency Services Act, commencing with Section 8550 of the Government Code, and Section 15269(c) regarding specific actions necessary to prevent or mitigate an emergency;

B. The adoption of the ordinance is exempt from CEQA review as it is not a "project" pursuant to CEQA Guidelines section 15378; and

C. The adoption of the ordinance is exempt under the "common sense exemption" set forth in CEQA Guidelines Section 15061(b)(3), which provides that CEQA applies only to projects having the potential to cause a significant effect on the environment, "where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA." The proposed project would amend the City's Zoning Code to refine the process for preparation of and consideration of relocation impact reports. The proposed Zoning Code amendments would not in and of themselves allow the development of any new structures or alteration of lands; rather, any future projects resulting from the closure of a mobile home park would require their own entitlement permit and CEQA review process.

Section 5. Severability. If any section, subsection, sentence, clause, phrase or word of this Ordinance is for any reason held to be invalid and/or unconstitutional by a court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this Ordinance.

Section 6. The Ordinance shall be in effect immediately upon its adoption.

IN COUNCIL DULY PASSED AND ADOPTED this 1st day of October, 2019.

AYES: (5) Mayor Schwedhelm, Vice Mayor Rogers, Council Members Fleming, Sawyer, Tibbetts

NOES: (0)

ABSENT: (2) Council Members Combs, Olivares

ABSTAIN: (0)

ATTEST: Sina Maris  
Acting City Clerk

APPROVED: J Schwedhelm  
Mayor

APPROVED AS TO FORM:

Sue Dille  
City Attorney

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## **Attachment C Legal Description**

### **PARCEL ONE:**

A portion of the Perry P. Strobino Tract in Rancho Miguel as described in the Deed recorded in Book 944 of Official Records, at Page 189, Sonoma County Records, and particularly described as follows:

Beginning at a 6" x 6" concrete monument on the Easterly line of the State Highway (Santa Rosa Freeway) at Freeway Survey Station #5 + 82.93 at the Northwest corner of the Strobino Tract; thence South 18° 24' 16" East along the Easterly line of said Freeway, a distance of 567.10 feet to the Southwest corner of that parcel of land deeded by Perry P. Strobino and wife to Gerald E. Foster and wife by Deed dated March 24, 1950 and recorded April 10, 1950, in the Office of the County Recorder of Sonoma County under Recorder's Serial No. D-10786, said point also being the true point of beginning of the parcel of land to be herein described; thence from said true point of beginning and along the Southerly line of said Foster parcel, North 71° 15' 40" East a distance of 617.2 feet to a point on the Westerly line of the old State Highway (via Mendocino Ave.) said point also being the Southeast corner of said Foster Parcel; thence Southeasterly along the Westerly line of said Old State Highway, and curving to the right with a radius of 1165.0 feet for a distance of 84.35 feet to a 6" x 6" concrete monument; thence continuing along the Old State Highway South 47° 10' 20" East a distance of 615.65 feet to a point; thence South 66° 08' West a distance of 960.01 feet to a point on the Easterly line of the State Highway (Santa Rosa Freeway); thence along the Easterly line of said Freeway, North 18° 24' 16" West a distance of 700.00 feet to the true point of beginning.

EXCEPTING THEREFROM that portion described in Deed to State of California, recorded July 8, 1960, in Book 1768 of Maps, Page 458, Sonoma County Records.

### **Parcel TWO:**

A portion of that parcel of land described as Parcel Two in the Final Order of Condemnation, Serial No. G068311, recorded October 24, 1961, in Book 1852, at Page 828, of Official Records, of Sonoma County, described as follows:

Commencing at the Southwesterly corner of said Parcel Two (1852 OR 828); thence along the Westerly and Northerly line of that Director's Easement Deed No. 195130DED recorded March 15, 1962, in Book 1878, at Page 233, of Official Records of Sonoma County, North 12° 31' 52" West, 150 feet, North 81° 50' 54" East, 416.57 feet and along a tangent curve to the right with a radius of 360.00 feet, through an angle of 13° 32' 07", an arc length of 85.05 feet; thence along the Easterly continuation of last said curve, from a tangent that bears South 84° 36' 59" East, an arc length of 98.61 feet, through an angle of 15° 41' 45", to the course described with a length of 617.2 feet in Parcel Two of said Final Order of Condemnation (1852 OR 828); thence along last said course South 71° 43' 30" West, 590.10 feet to the point of commencement.

APN: 173-030-001



# Attachment E Parcel Report

## City of Santa Rosa Parcel Report

173-030-001

7/1/2018 10:49:45 AM

### County Assessor Information

**Address:** 3575 MENDOCINO AVE  
SANTA ROSA, CA 95403

**Land Use:** MANUFACTURED HOME PARK

**Tax Area:** 004002

**Jurisdiction:** SANTA ROSA

**Recording#:** 2006R007510

**Rec Date:** 01/20/2006

**Lot Acres:** 13.31

**Land Value:** \$2,091,097

**Bldg Value:** \$1,277,081

**Bldg Sqft:** 0

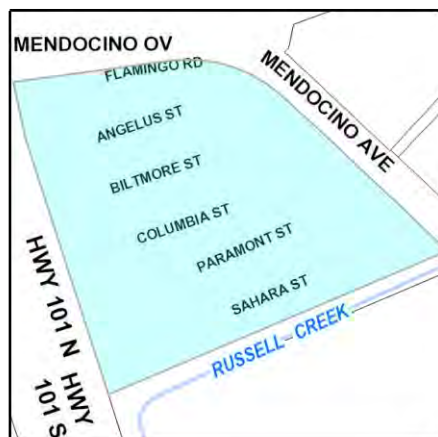
**Built:**

**Res Units:**

**Bedrooms:** 0

**Bathrooms:** 0

**Com Units:**



### Santa Rosa Only Information

**General Plan:** Mobile Home Park

**Area Plan:**

**Zoning Code:** RR-40-RC

**Identifier:**

**Planned Dev:**

**Historic Dist:**

**Fault km:** 2

**Wind Zone:** Exposure C

**Fire Zone:**

**Park Fee:** Service Area No. 3 - Northeast

**Fire District:** 11

### GIS Calculated Information

**Lot Acres:** 13.18

**Latitude:** 38.473436

**Longitude:** -122.728890

**Census Tract:** 152100

**Census Block:** 1005

**Street Sweep:** 2nd Monday

**Elem School:** STEELE LANE

This report is a user generated static output from an Internet mapping site and is for reference only. Data that appear on this report may or may not be accurate, current, or otherwise reliable. GIS Calculated Lot Acres is NOT official. Assessor Data is maintained by Sonoma County.

# Attachment F HCD Report



**STATE OF CALIFORNIA – BUSINESS, CONSUMER SERVICES, & HOUSING AGENCY**  
**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT**  
**DIVISION OF CODES AND STANDARDS**  
**ACTIVITY REPORT**

Date: **January 24, 2018** Report by: **DRI Bart Hotchkiss** Telephone: **707-721-4712**

Applicant: \_\_\_\_\_

Address: \_\_\_\_\_

Activity Site: (if other than above) **Journeys End MHP**

**3575 Mendocino Ave Santa Rosa CA 95403** Telephone: \_\_\_\_\_

OWNER: (if other than above) **3575 Mendocino Ave Associates, LLC.**

Address: **871 38<sup>th</sup> Ave Santa Cruz CA 95062**

AREA OFFICES:

Northern Area  
 9342 Tech Center Drive  
 Suite 550  
 Sacramento, CA 95826  
 (916) 255-2501

Southern Area  
 3737 Main Street  
 Suite 400  
 Riverside, CA 92501  
 (951) 782-4420

**Department Use Only**

**FILE IDENTIFICATION:**  
 CPT Assignment #: \_\_\_\_\_  
 FAC ID #: **49-0046-MP**

**LABOR DATA:**  
 DR ID: 176 Date: **January 24, 2018**  
 PCA/ACT CODE: **MP-FM** AREA: **NAO**  
 CO: **49** TR MILES: **40**

TIME INSP/ACT: **1** TR: **1**

**INSPECTION DATA:**  
 Time Report Only  Progress Inspection  
 Initial Inspection  Re-Inspection

# HOME/UNIT: \_\_\_\_\_ # FLOORS: \_\_\_\_\_

**VIOLATION DATA:**

Total:  
 S \_ F \_ E \_ M \_ P \_ G/O \_ NP \_

- PURPOSE OF REPORT: (Checked  as appropriate)
- INSPECTION RECORD ONLY
  - INFORMATION ONLY
  - NOTICE OF VIOLATION AND RELATED INFORMATION:

This report provides notice of violations of the California Health and Safety Code, Division 13 or the California Code of Regulations, Title 25, Division 1, Chapter \_\_\_\_\_, Sections indicated. Copies of the regulations may be obtained from Barclays Law Publishers, P.O. Box 3066, South San Francisco, CA 94083-3066

Violations indicated shall be corrected and a written request for further inspection filed with the Area Office indicated above within \_\_\_\_\_ days. The request for inspection shall be accompanied by a minimum fee of \$ \_\_\_\_\_

A permit shall be obtained from the Area Office identified above for work to correct item(s) # \_\_\_\_\_

If you believe this report has been issued in error or is factually incorrect, please contact the Area Supervisor at the Area Office indicated above.

**INSPECTION UNIT IDENTIFICATION:**

Type of Unit: \_\_\_\_\_ Box Size: \_\_\_\_\_ Overall Size: \_\_\_\_\_ RT Decal: \_\_\_\_\_

Manufacturer: \_\_\_\_\_ Year: \_\_\_\_\_ Model: \_\_\_\_\_

HUD Label or HCD Insignia No.: \_\_\_\_\_

Serial No. or V.I.N.: \_\_\_\_\_

**MH ALTERATION TYPE:**  
 AC  ACC  ROOF  FP  O

**THIRD PARTY MONITORING:**

QAA @  HQ  IP  DL  IS  
 DAA # PLANS \_\_\_\_\_ # COMPLY \_\_\_\_\_

**MP INSPECTION DATA:**

BLG/FIX: \_\_\_\_\_ MH Lot \_\_\_\_\_ RV Lot \_\_\_\_\_ AS: \_\_\_\_\_

**EH INSPECTION DATA:**

Active  Inactive

MAX CAP: \_\_\_\_\_ P CAP: \_\_\_\_\_ OCC: \_\_\_\_\_

SFD: \_\_\_\_\_ DORM: \_\_\_\_\_ MHRV: \_\_\_\_\_ O \_\_\_\_\_

**FEE ACCOUNTING:**

DTN#: \_\_\_\_\_

	USED	DUE	ATTACHED
INSPECTION			
INSIGNIA			
OTHER			

Attached Fee I.D. \_\_\_\_\_

**INSPECTION RESULTS OR INFORMATION:**

Based on two site inspections on November 22, 2017 and January 24, 2018, the Department of Housing and Community Development has determined the following:

The Journey's End Mobilehome Park consisted of 160 lots. On October 9, 2017, a wildfire reached the park destroying 116 MH-Units. There are 44 MH-Units remaining in the park. These remaining units are uninhabitable due to the destruction of the park infrastructure. This was an extremely hot fire causing near total destruction of all park systems.

Inspections revealed the existing gas and electrical systems as well as the new gas and electrical systems that were scheduled to be connected within days after the fire, were essentially rendered inoperable and

Received By: \_\_\_\_\_ Title: \_\_\_\_\_

**DEPARTMENT USE ONLY:**  Close File  Reinspection Required  Progress Inspection Required

Enforcement Action Needed:  FCO  NOI  Other:

COPIES SENT TO:  Applicant  MHRV Owner  Park Operator/Owner  SAA  HQ  Other:

REVIEWED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ COPIES SENT BY: \_\_\_\_\_ DATE: \_\_\_\_\_





**ACTIVITY REPORT CONTINUED**

DATE: January 24, 2018

all above ground utilities and equipment were destroyed. These systems are contiguous throughout the park and it is not possible to isolate the utility systems to service the existing homes. The electrical system must be replaced from the transformers onward and both the new and the legacy gas systems are contaminated with debris. Additionally, the mobilehome park's private potable water system is also destroyed and the well is contaminated; the sewer system also suffered major damage and debris has entered the sewer piping blocking it in multiple locations.

As a result of the fire damage to the utilities and the park infrastructure, and, the fact that the park operator has estimated it would take approximately two years for the park infrastructure to be repaired enough to lawfully permit a unit to be installed or occupied within the park, the 44 remaining homes that did not sustain fire damage, the Department deems as substandard. Therefore, the prohibited occupancy shall remain in effect until the park infrastructure is rebuilt, replaced or corrected.



Typical Lot with sewer inlet full of debris



Main gas service inlet and electrical transformer



**ACTIVITY REPORT CONTINUED**

DATE: January 24, 2018



Typical example of destroyed electrical pedestal.



Electrical distribution panel.



Main electrical distribution panel.



Gas meter connection





**ACTIVITY REPORT CONTINUED**

DATE: January 24, 2018



**Attachment G**  
**Mobile Homes for Sale**

<b>ML Number</b>	<b>Area Display</b>	<b>Street Full Address</b>	<b>Property Type</b>	<b>Listing Price</b>	<b>Listing Date</b>
21918416	Lake County	5701 Live Oak Dr, Kelseyville, CA 95451	Mobile Home	\$23,500.00	7/15/19
21924231	Ukiah	460 Gobbi St #36, Ukiah, CA 95482	Mobile Home	\$26,000.00	9/15/19
LC19220120	Clearlake	5825 Old Highway 53 #27, Clearlake, CA	Mobile Home	\$17,000.00	9/14/19
LC19169156	Clearlake	3571 Toyon St, Clearlake, CA 95422	Mobile Home	\$34,000.00	10/4/19
21925564	Ukiah	778 S State St #34, Ukiah, CA 95482	Mobile Home	\$35,000.00	9/28/19
21925992	Ukiah	700 E Gobbi St #94, Ukiah, CA 95482	Mobile Home	\$44,900.00	10/7/19
21908321	Calpella/Redwood Vly	4951 N. State St #A11, Ukiah, CA 95482	Mobile Home	\$45,000.00	5/1/19
LC19076821	Clearlake	7665 Cache Creek Way Unit 2, Clearlake, CA 95422	Mobile Home	\$54,000.00	7/19/19
21918293	Lake County	1025 Martin St #35, Lakeport, CA 95453-4952	Mobile Home	\$59,000.00	7/16/19
LC19136533	Clearlake	4074 Snook Ave, Clearlake, CA 95422	Mobile Home	\$60,000.00	6/11/19
LC19209464	Clearlake	3246 15th St, Clearlake, CA 95422	Mobile Home	\$60,000.00	10/7/19
LC19201558	Clearlake	14529 Alvita Ave, Clearlake, CA 95422	Mobile Home	\$60,000.00	10/4/19
21925743	Vacaville	54 Lemon Tree Cir, Vacaville, CA 95687	Mobile Home	\$60,000.00	10/1/19
21920544	Santa Rosa-Southeast	252 pear Ln, Santa Rosa, CA 95407	Mobile Home	\$65,000.00	8/4/19
21922011	Cloverdale	29 Chelsea Cir, Cloverdale, CA 95425	Mobile Home	\$67,500.00	5/22/19
21920398	Ukiah	700 E Gobbi St #88, Ukiah, CA 95482	Mobile Home	\$69,000.00	8/2/19
LC19201568	Clearlake	3243 11th St, Clearlake, CA 95422	Mobile Home	\$69,900.00	8/23/19
21918763	Santa Rosa-Northeast	116 Brooktrail Ct, Santa Rosa, CA 95409	Mobile Home	\$72,500.00	7/20/19
21909646	Santa Rosa-Northeast	51 Arthur Dr, Santa Rosa, CA 95403	Mobile Home	\$79,000.00	4/24/19

ML Number	Area Display	Street Full Address	Property Type	Listing Price	Listing Date
21923100	Santa Rosa-Northeast	25 Shadybrook Ct, Santa Rosa, CA 95409	Mobile Home	\$79,000.00	9/1/19
21922321	Vacaville	1597 Alamo Dr #115, Vacaville, CA 95687	Mobile Home	\$79,000.00	9/1/19
21922287	Lake County	6938 Butte St, Nice, CA 95464	Mobile Home	\$80,000.00	8/17/19
21926298	Sonoma	18925 Sonoma Highway #57, Sonoma, CA 95476	Mobile Home	\$82,000.00	10/7/19
21923914	American Canyon	3000 BROADWAY St #90, American Canyon, CA 94503	Mobile Home	\$83,800.00	9/11/19
21916762	Ukiah	460 E Gobbi St #48, Ukiah, CA 95482	Mobile Home	\$85,000.00	6/25/19
21923958	Windsor	115 Katherine Pl, Windsor, CA 95492	Mobile Home	\$85,000.00	8/9/19
LC19148291	Clearlake	15951 21st Ave, Clearlake, CA 95422	Mobile Home	\$89,000.00	6/23/19
21919337	Lake County	6942 La Helena Dr, Lucerne, CA 95458	Mobile Home	\$89,000.00	7/20/19
21922909	Santa Rosa-Northwest	1174 Healey Ct, Santa Rosa, CA 95401	Mobile Home	\$89,500.00	8/22/19
21926185	Santa Rosa-Northeast	56 Ellie Dr, Santa Rosa, CA 95403	Mobile Home	\$89,900.00	10/8/19
21925923	Vacaville	93 Lemon Tree Cir, Vacaville, CA 95687	Mobile Home	\$94,500.00	10/3/19
21908853	Santa Rosa-Northeast	98 Coronado Cir, Santa Rosa, CA 95409	Mobile Home	\$94,900.00	4/25/19
21919673	Vacaville	700 Shady Glen Rd #11, Vacaville, CA 95688-2552	Mobile Home	\$97,000.00	7/30/19
21916277	Santa Rosa-Northwest	163 Sequoia Cir, Santa Rosa, CA 95401	Mobile Home	\$98,000.00	6/25/19
21903721	Windsor	8124 C St, Windsor, CA 95492-9323	Mobile Home	\$99,000.00	2/20/19
LC19115675	Clearlake	15922 30th Ave, Clearlake, CA 95422	Mobile Home	\$99,000.00	5/17/19
21917556	Vacaville	66 Lemon Tree Cir, Vacaville, CA 95687	Mobile Home	\$99,000.00	7/15/19
21921090	Sebastopol	8800 Green Valley Rd #51, Sebastopol, CA 95472	Mobile Home	\$99,000.00	8/13/19
21922198	Santa Rosa-Northeast	89 Greenrock Ct, Santa Rosa, CA 95409	Mobile Home	\$99,000.00	7/23/19
21913128	Santa Rosa-Northeast	27 Springhill Ct, Santa Rosa, CA 95409	Mobile Home	\$99,500.00	5/24/19

ML Number	Area Display	Street Full Address	Property Type	Listing Price	Listing Date
21914804	American Canyon	244 American Canyon Rd #21, American Canyon, CA 94503	Mobile Home	\$100,000.00	6/9/19
LC19136487	Clearlake	3625 Sycamore St, Clearlake, CA 95422	Mobile Home	\$103,000.00	6/11/19
21924675	Sonoma	107 Paseo Palencia, Sonoma, CA 95476	Mobile Home	\$105,000.00	9/18/19
21926269	Vallejo	338 San Marcus Dr, Vallejo, CA 94590	Mobile Home	\$107,000.00	10/8/19
LC19167226	Clearlake	6331 Oak Ave, Clearlake, CA 95422	Mobile Home	\$108,000.00	7/15/19
21906981	Sonoma	228 Pomo Way, Sonoma, CA 95476-0000	Mobile Home	\$108,000.00	4/29/19
21921546	Calistoga	18 Rockrose Ln, Calistoga, CA 94515	Mobile Home	\$109,000.00	8/16/19
LC19189722	Clearlake	15576 28th Ave, Clearlake, CA 95422	Mobile Home	\$110,000.00	8/10/19
21922828	Yountville	124 Burgundy Cir, Yountville, CA 94599	Mobile Home	\$110,000.00	8/31/19
21926271	Ukiah	700 E Gobbi St #77, Ukiah, CA 95482	Mobile Home	\$112,000.00	10/8/19
21913799	Lake County	1800 S. Main St #22, Lakeport, CA 95453-5625	Mobile Home	\$114,500.00	4/3/19
21918683	Vallejo	356 SAN MARCUS Dr, Vallejo, CA 94590	Mobile Home	\$114,900.00	7/19/19
21920557	Petaluma East	117 Oakwood Dr, Petaluma, CA 94954-1504	Mobile Home	\$114,900.00	8/4/19
21915580	Yolo County	132 Leisureville Cir, Woodland, CA 95776	Mobile Home	\$114,950.00	6/12/19
21916943	Santa Rosa-Northeast	92 Cardinal Way, Santa Rosa, CA 95409	Mobile Home	\$115,000.00	7/1/19
21922610	Sebastopol	8800 Green Valley Rd #6, Sebastopol, CA 95472	Mobile Home	\$117,000.00	8/31/19
21920028	Santa Rosa-Northeast	60 Redwing Dr, Santa Rosa, CA 95409	Mobile Home	\$118,750.00	7/26/19
21825677	Calistoga	2412 Foothill Blvd #165, Calistoga, CA 94515	Mobile Home	\$119,000.00	9/30/18
21918065	Sebastopol	6860 Redwood Ave #59, Sebastopol, CA 95472	Mobile Home	\$119,000.00	7/13/19
21921561	Lake County	1800 S Main St #36, Lakeport, CA 95453-5626	Mobile Home	\$119,000.00	8/16/19
21924764	Vacaville	1597 Alamo Dr #213, Vacaville, CA 95687	Mobile Home	\$119,000.00	9/13/19

ML Number	Area Display	Street Full Address	Property Type	Listing Price	Listing Date
21917210	Santa Rosa-Northeast	72 Plymouth Way, Santa Rosa, CA 95403-1149	Mobile Home	\$119,900.00	7/1/19
LC18234051	Clearlake	3615 Cottonwood St, Clearlake, CA 95422	Mobile Home	\$120,000.00	9/26/18
21921521	Santa Rosa-Northeast	112 Colonial Park Dr, Santa Rosa, CA 95403	Mobile Home	\$120,000.00	8/12/19
21922307	Calistoga	2412 Foothill Blvd #160, Calistoga, CA 94515	Mobile Home	\$120,000.00	8/26/19
21813737	Calistoga	2412 Foothill Blvd #130, Calistoga, CA 94515	Mobile Home	\$125,000.00	5/29/18
21922483	Windsor	609 Aspen Way, Windsor, CA 95492	Mobile Home	\$125,000.00	8/24/19
21922685	Santa Rosa-Northwest	488 Colonial Park Way, Santa Rosa, CA 95403	Mobile Home	\$125,000.00	7/13/19
21923276	Santa Rosa-Northwest	847 Mercie St, Santa Rosa, CA 95403	Mobile Home	\$125,000.00	9/7/19
LC19030053	Clearlake	5068 Manzanita Ave, Clearlake, CA 95422	Mobile Home	\$129,000.00	3/15/19
LC19167599	Clearlake	15774 38th Ave, Clearlake, CA 95422	Mobile Home	\$129,000.00	7/15/19
21914710	Calistoga	2412 Foothill Blvd #88, Calistoga, CA 94515	Mobile Home	\$129,000.00	6/9/19
21917785	Santa Rosa-Northwest	57 Estrella Dr, Santa Rosa, CA 95403	Mobile Home	\$129,000.00	7/9/19
21918036	Santa Rosa-Northeast	193 Bluejay Dr, Santa Rosa, CA 95409	Mobile Home	\$129,000.00	7/17/19
21923351	Yountville	6468 washington St, Yountville, CA 94599	Mobile Home	\$129,900.00	9/5/19
21921206	Sebastopol	6710 Evergreen Ave, Sebastopol, CA 95472	Mobile Home	\$130,000.00	5/20/19
21923135	Santa Rosa-Northeast	191 Colonial Park Dr, Santa Rosa, CA 95403	Mobile Home	\$132,500.00	9/5/19
21921218	Benicia	300 E H St #124, Benicia, CA 94510	Mobile Home	\$133,000.00	8/12/19
21921469	Cotati/Rohnert Park	260 Circulo Tierra, Rohnert Park, CA 94928	Mobile Home	\$135,000.00	8/15/19
21924147	Calistoga	144 Wisteria Dr, Calistoga, CA 94515	Mobile Home	\$135,000.00	9/14/19
21921744	American Canyon	244 American Canyon Rd #45, American Canyon, CA 94503	Mobile Home	\$137,777.00	8/29/19
21915883	Calistoga	2412 Foothill Blvd #129, Calistoga, CA 94515-1253	Mobile Home	\$138,500.00	6/20/19

ML Number	Area Display	Street Full Address	Property Type	Listing Price	Listing Date
21919353	Santa Rosa-Northwest	117 Estrella Dr, Santa Rosa, CA 95403	Mobile Home	\$138,500.00	7/26/19
21921969	Cotati/Rohnert Park	194 Circulo Jalisco Ave, Rohnert Park, CA 94928	Mobile Home	\$139,000.00	5/30/19
21921382	Napa	64 Hacienda Dr, Napa, CA 94558	Mobile Home	\$141,000.00	8/15/19
21906970	Calistoga	2412 Foothill Blvd #63, Calistoga, CA 94515	Mobile Home	\$142,900.00	3/30/19
21919306	Vallejo	1161 Benicia Rd #9, Vallejo, CA 94591	Mobile Home	\$144,900.00	7/25/19
21915842	Calistoga	2412 Foothill Blvd. Blvd #58, Calistoga, CA 94515	Mobile Home	\$145,000.00	6/20/19
21924488	Greenbrae	2130 Redwood Hwy #C8, Greenbrae, CA 94904	Mobile Home	\$145,000.00	9/17/19
21827980	Calistoga	2412 Foothill Blvd #29, Calistoga, CA 94515	Mobile Home	\$147,000.00	10/27/18
21924117	Santa Rosa-Northeast	114 Redwing Dr, Santa Rosa, CA 95409	Mobile Home	\$148,750.00	9/13/19
21920374	Windsor	1126 Chinaberry St, Windsor, CA 95492	Mobile Home	\$148,950.00	8/5/19
21904749	Calistoga	117 Heather Ln, Calistoga, CA 94515	Mobile Home	\$149,000.00	4/1/19
21909523	Santa Rosa-Northeast	3455-37 Santa Rosa Ave, Santa Rosa, CA 95407-7953	Mobile Home	\$149,000.00	4/15/19
21920116	Santa Rosa-Northeast	86 Greenrock Ct, Santa Rosa, CA 95409-2718	Mobile Home	\$149,000.00	8/2/19
21921787	Calistoga	2412 Foothill Blvd #85, Calistoga, CA 94515	Mobile Home	\$149,000.00	8/20/19
LC19233913	Clearlake	13655 Manakee Ave, Clearlake, CA 95422	Mobile Home	\$149,500.00	10/3/19
LC19219959	Clearlake	3896 Hemlock Ave, Clearlake, CA 95422	Mobile Home	\$149,900.00	9/14/19
21919685	Vallejo	1161 Benicia Rd #2, Vallejo, CA 94591	Mobile Home	\$149,900.00	7/30/19
21902395	Windsor	8152 D St, Windsor, CA 95492-9325	Mobile Home	\$149,950.00	2/3/19
21924149	Cotati/Rohnert Park	209 apple Ln, Rohnert Park, CA 94928	Mobile Home	\$149,950.00	9/14/19
21925321	Cotati/Rohnert Park	174 Walnut Cir, Rohnert Park, CA 94928	Mobile Home	\$150,000.00	9/25/19
21919686	Yountville	6468 Washington St #115, Yountville, CA 94599	Mobile Home	\$151,050.00	7/30/19

ML Number	Area Display	Street Full Address	Property Type	Listing Price	Listing Date
21917924	Cotati/Rohnert Park	252 Circulo Tierra, Rohnert Park, CA 94928	Mobile Home	\$153,900.00	7/15/19
21925685	Yountville	6468 Washington St #77, Yountville, CA 94599-1318	Mobile Home	\$154,900.00	10/1/19
21823809	Santa Rosa-Southeast	282 Ricardo Ave, Santa Rosa, CA 95407	Mobile Home	\$155,000.00	8/30/18
21914379	Calistoga	929 Champagne Cir S, Calistoga, CA 94515	Mobile Home	\$158,000.00	5/5/19
21920511	Cotati/Rohnert Park	20 Ramble Creek Dr, Cotati, CA 94931	Mobile Home	\$158,900.00	7/22/19
21915852	Cotati/Rohnert Park	14 Circulo Lujo, Rohnert Park, CA 94928	Mobile Home	\$159,000.00	5/27/19
21920812	Cotati/Rohnert Park	181 Walnut Cir, Rohnert Park, CA 94928	Mobile Home	\$160,000.00	8/8/19
21924119	Cotati/Rohnert Park	187 Zaragoza St, Rohnert Park, CA 94928-2324	Mobile Home	\$160,000.00	9/13/19
21903174	Santa Rosa-Southeast	290 Ricardo Ave, Santa Rosa, CA 95407	Mobile Home	\$165,000.00	2/15/19
21923003	Santa Rosa-Northeast	88 Kilarney Ln, Santa Rosa, CA 95403	Mobile Home	\$165,000.00	9/3/19
21925395	Cotati/Rohnert Park	34 Chestnut Ct, Rohnert Park, CA 94928	Mobile Home	\$165,000.00	9/27/19
LC19146677	Clearlake	16144 42nd Ave, Clearlake, CA 95422	Mobile Home	\$167,500.00	6/21/19
21919465	Santa Rosa-Northeast	144 Bluestone Ct, Santa Rosa, CA 95409	Mobile Home	\$168,000.00	7/26/19
21902368	Vacaville	87 Lemon Tree Cir, Vacaville, CA 95687	Mobile Home	\$169,000.00	2/1/19
21917678	Santa Rosa-Southeast	30 Wayside Dr, Santa Rosa, CA 95407-7631	Mobile Home	\$169,000.00	7/9/19
21921666	Napa	135 Garth Ct, Napa, CA 94558	Mobile Home	\$169,000.00	8/16/19
21925540	Calistoga	417 Burgundy S, Calistoga, CA 94515	Mobile Home	\$169,000.00	9/27/19
LC19210268	Clearlake	16144 30th Ave, Clearlake, CA 95422	Mobile Home	\$169,000.00	9/4/19
21924914	Vacaville	79 Sunset Cir, Vacaville, CA 95687-4061	Mobile Home	\$170,000.00	7/31/19
21919349	Santa Rosa-Northeast	174 Mossbridge Ct, Santa Rosa, CA 95409	Mobile Home	\$174,000.00	7/12/19
21922187	Santa Rosa-Northeast	92 Greenrock Ct, Santa Rosa, CA 95409	Mobile Home	\$174,000.00	3/1/19

ML Number	Area Display	Street Full Address	Property Type	Listing Price	Listing Date
LC19164614	Clearlake	15658 19th Ave, Clearlake, CA 95422	Mobile Home	\$175,000.00	7/12/19
21915063	Windsor	8146 D St, Windsor, CA 95492	Mobile Home	\$175,000.00	5/24/19
21920295	Calistoga	2412 Foothill Blvd, Calistoga, CA 94515-1241	Mobile Home	\$175,000.00	8/26/19
21924784	Sonoma	120 Paseo Palencia, Sonoma, CA 95476	Mobile Home	\$175,000.00	9/23/19
21925145	Cotati/Rohnert Park	133 Verde Cir, Rohnert Park, CA 94928	Mobile Home	\$175,000.00	9/22/19
LC19121043	Clearlake	14831 Saroni Pkwy, Clearlake, CA 95422	Mobile Home	\$178,000.00	5/23/19
21918494	Lake County	5966 Live Oak Dr, Kelseyville, CA 95451	Mobile Home	\$179,000.00	7/8/19
21917312	Petaluma East	12 Oakwood Dr, Petaluma, CA 94954	Mobile Home	\$179,500.00	7/6/19
21924796	Petaluma East	1821 Lakeville Hwy #51, Petaluma, CA 94954-5311	Mobile Home	\$179,500.00	9/20/19
LC19200891	Clearlake	16375 Dam Rd, Clearlake, CA 95422	Mobile Home	\$195,000.00	8/22/19
LC19102878	Clearlake	2903 11th St, Clearlake, CA 95422	Mobile Home	\$195,500.00	5/4/19
21922871	Petaluma East	71 Candlewood Dr, Petaluma, CA 94954	Mobile Home	\$198,500.00	9/1/19
21908870	Yountville	6468 Washington St #148, Yountville, CA 94599	Mobile Home	\$199,000.00	4/17/19
21921265	Yountville	6468 Washington St #9, Yountville, CA 94599-1312	Mobile Home	\$199,000.00	8/12/19
21925867	Santa Rosa-Northeast	2 Shamrock Cir, Santa Rosa, CA 95403	Mobile Home	\$199,000.00	9/12/19
21922417	Santa Rosa-Northwest	1945 Piner Rd #36, Santa Rosa, CA 95403-6906	Mobile Home	\$199,500.00	8/26/19
21909043	Cotati/Rohnert Park	184 Walnut Cir, Rohnert Park, CA 94928-2656	Mobile Home	\$205,000.00	4/18/19
21923235	Cotati/Rohnert Park	379 Circulo Lacruz, Rohnert Park, CA 94928	Mobile Home	\$205,000.00	9/1/19
21923189	Calistoga	313 Chablis South Cir, Calistoga, CA 94515	Mobile Home	\$210,000.00	9/3/19
21918691	Santa Rosa-Northeast	153 Redwing Dr, Santa Rosa, CA 95409	Mobile Home	\$220,000.00	7/2/19
21922077	Sonoma	158 Bear Flag Way, Sonoma, CA 95476	Mobile Home	\$220,000.00	8/21/19



ML Number	Area Display	Street Full Address	Property Type	Listing Price	Listing Date
21925042	Santa Rosa-Northeast	37 Darcy Dr, Santa Rosa, CA 95403-1188	Mobile Home	\$225,000.00	9/11/19
21926075	Yountville	139 Chablis Cir, Yountville, CA 94599	Mobile Home	\$225,000.00	9/19/19
21926151	Santa Rosa-Northwest	81 Sequoia Cir, Santa Rosa, CA 95401-4995	Mobile Home	\$225,000.00	10/7/19
21923091	Sonoma	124 Mayan Dr, Sonoma, CA 95476	Mobile Home	\$229,000.00	8/30/19
21913356	Yountville	137 Chablis Cir, Yountville, CA 94599	Mobile Home	\$230,000.00	5/29/19
LC19209621	Clearlake	3975 Oak Ave, Clearlake, CA 95422	Mobile Home	\$234,900.00	9/3/19
21920325	Santa Rosa-Northwest	39 Sequoia Cir SW, Santa Rosa, CA 95401-4989	Mobile Home	\$235,000.00	9/8/19
21925931	Santa Rosa-Northeast	79 Shamrock Cir, Santa Rosa, CA 95403-1155	Mobile Home	\$245,000.00	10/3/19
LC19234156	Clearlake	10937 Crestview Dr, Clearlake, CA 95424	Mobile Home	\$249,000.00	10/2/19
21907715	Yountville	173 Riesling Cir, Yountville, CA 94599	Mobile Home	\$250,000.00	4/5/19
21916560	Santa Rosa-Northwest	1945 Piner Rd #221, Santa Rosa, CA 95403-2457	Mobile Home	\$255,000.00	6/26/19
21923763	Santa Rosa-Northwest	1945 Piner Rd #100, Santa Rosa, CA 95403	Mobile Home	\$255,000.00	9/5/19
21924554	Santa Rosa-Northwest	88 Westgate Cir, Santa Rosa, CA 95401	Mobile Home	\$259,000.00	9/19/19
21923908	Coastal Mendocino	43300 Little River Airport Rd #29, Little River, CA 95456-9614	Mobile Home	\$259,950.00	9/7/19
21923472	Novato	181 Marin Valley Dr, Novato, CA 94949	Mobile Home	\$268,000.00	8/31/19
21919837	Novato	902 San Pablo Way, Novato, CA 94949-6205	Mobile Home	\$269,000.00	7/31/19
21925761	Santa Rosa-Northwest	136 Westgate Cir, Santa Rosa, CA 95401-5831	Mobile Home	\$269,000.00	9/26/19
21911891	Santa Rosa-Northwest	207 Monarch Ct, Santa Rosa, CA 95401-9033	Mobile Home	\$270,000.00	5/13/19
21920968	Novato	32 Marin Valley Dr, Novato, CA 94949	Mobile Home	\$275,000.00	8/1/19
21921970	Windsor	8012 Cliffrose St, Windsor, CA 95492-9537	Mobile Home	\$275,000.00	8/23/19
21921453	Napa	242 clover Way, Napa, CA 94558-1328	Mobile Home	\$290,000.00	7/31/19

<b>ML Number</b>	<b>Area Display</b>	<b>Street Full Address</b>	<b>Property Type</b>	<b>Listing Price</b>	<b>Listing Date</b>
21906829	Novato	199 Marin Valley Dr, Novato, CA 94949	Mobile Home	\$299,900.00	3/27/19
21925487	Novato	123 Marin Valley Dr, Novato, CA 94949	Mobile Home	\$319,900.00	9/29/19
21925911	Napa	203 Daisy Dr, Napa, CA 94558-1335	Mobile Home	\$320,000.00	10/2/19
21912015	San Rafael	75 Yosemite Rd, San Rafael, CA 94903	Mobile Home	\$324,000.00	5/14/19
21909656	Novato	104 Sunrise Ln, Novato, CA 94949	Mobile Home	\$325,000.00	1/12/19
21902982	Yountville	6468 Washington St #150, Yountville, CA 94599	Mobile Home	\$335,000.00	2/14/19
21925759	Novato	120 Ensenada Dr, Novato, CA 94949-6129	Mobile Home	\$349,000.00	10/1/19
21915963	Calistoga	803 E Champagne Cir, Calistoga, CA 94515	Mobile Home	\$350,000.00	6/21/19
21917729	Yountville	185 Sauterne Cir, Yountville, CA 94599-1288	Mobile Home	\$359,000.00	8/23/19
21925554	St. Helena	1 La Cuesta Ct, St. Helena, CA 94574	Mobile Home	\$395,000.00	9/30/19

## Attachment H Available Conventional Housing

<b>Date</b>	<b>Description of Unit Available</b>	<b>Bed</b>	<b>Location</b>	<b>Monthly Rent</b>	<b>Distance to Santa Rosa</b>
30-Sep	<a href="#">Affordable Studios</a>	<a href="#">Studio</a>	El Cerrito	\$595	42.7
Sep 28	<a href="#">6520 E. Hwy. 20 Unit #3</a>	<a href="#">1 bed</a>	Lucerne	\$650	44.2
Sep 30	<a href="#">Small living area</a>	<a href="#">1 bed</a>	Napa	\$650	17.2
Sep 28	<a href="#">1 bedroom cottage downtown</a>	<a href="#">1 bed</a>	Clearlake	\$650	36.3
Sep 30	<a href="#">FURNISHED,MODERN,CLEAN,PRIVATE ONE BEDROOM AVAILABLE,</a>	<a href="#">1 bed</a>	Berkeley	\$670	46.8
Sep 26	<a href="#">Small rustic cabin</a>	<a href="#">Studio</a>	Healdsburg/Windsor	\$675	21.2
Aug 28	<a href="#">Clearlake Oaks studio apartment</a>	<a href="#">Studio</a>	Clearlake	\$700	40.2
Sep 24	<a href="#">Charming &amp; elegant 1BD,1BTH.</a>	<a href="#">1 bed</a>	Berkeley	\$715	46.2
Aug 31	<a href="#">Lucerne rental</a>	<a href="#">1 bed</a>	Lucerne	\$750	44.2
Sep 28	<a href="#">TINY HOUSE STUDIO FOR RENT IN QUIET LAKEFRONT RV PARK IN TOWN OF NICE</a>	<a href="#">Studio</a>	Nice	\$750	47.7
Sep 30	<a href="#">Studio apartment 2nd floor</a>	<a href="#">Studio</a>	Clearlake	\$450	33.6