

CITY OF SANTA ROSA
CITY COUNCIL

TO: MAYOR AND CITY COUNCIL
FROM: CLARE HARTMAN, DEPUTY DIRECTOR
PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT
SUBJECT: JOURNEY'S END MOBILE HOME RELOCATION IMPACT
REPORT – PRJ19-040

AGENDA ACTION: RESOLUTION

RECOMMENDATION

It is recommended by the Planning and Economic Development Department that the Council, by resolution, approve the Journey's End Mobile Home Park Relocation Impact Report prepared in accordance with Santa Rosa City Code 20-28.100.J (Resilient City Mobile Home Park Conversions).

EXECUTIVE SUMMARY

Beginning on the evening of October 8, 2017, and continuing for days thereafter, a series of wildfire events known as the Tubbs Fire damaged or destroyed thousands of residential and commercial structures within the City of Santa Rosa.

City Code Chapter 6-67, Mobile Home Conversions, sets forth specific requirements related to mobile home park closures including preparation of relocation impact reports (also known as a mobile home park closure reports). Such regulations have been in effect since 1996 and do not address the closure of a mobile home park following a catastrophic natural disaster event such as the Tubbs & Nuns Fires of October 2017 (Fires). As such, on October 1, 2019, the City Council, by urgency ordinance, amended City Code Section 20-28.100, the Resilient City (-RC) Combining District, to facilitate the recovery process for mobile home park sites severely impacted by the Fires.

Through this policy, the Journey's End Mobile Home Park owner requests Council approval of the proposed Mobile Home Relocation Impact Report. Pursuant to State Government Code 65863.7 and Santa Rosa City Code 20-28.100.J, the Report discusses 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 provided.

BACKGROUND

1. Project Description

The Journey's End Mobile Home Park consisted of a total of 160 homes and one manager's unit prior to the Fires in October 2017.

The subject Relocation Impact Report focuses on the 88 owners whose mobile homes were impacted by the Fires and who:

- Owned their mobile homes; and
- Whose homes were destroyed; and
- Who have not entered into an agreement with the park owner.

The applicant proposes mitigation in the form of payment in an amount roughly equal to six months average space rent and a one-month security deposit in the park; \$4500 per household. In addition to this payment, the Report acknowledges other sources of assistance such as the forgiveness of rent and utilities by the park owner immediately following the Fires; Insurance proceeds and benefits; and the granting of priority to prior qualified residents for any new affordable housing units should the park site redevelop in the future.

Units and households not subject to the Report include the following:

- The 24 tenants who resided in mobile homes that were destroyed by the Fires and are subject to traditional landlord/tenant law; and
- The 44 households whose mobile homes were not destroyed and have entered into agreements with the park owner; and
- The 4 vacant homes and one managers unit that were under park ownership.

2. Background

On 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. These Fires damaged or destroyed approximately 3,000 homes in the City of Santa Rosa city limits, representing 5% of the housing stock and 100 commercial structures.

Amongst the structures destroyed or damaged were 191 mobile homes located across three different mobile home parks. Of the parks impacted, the Journey's End Mobile Home Park suffered the most extensive damage resulting in the

destruction or damage of 160 mobile homes plus one manager unit; with 73% or 117 units in Journey's End totally destroyed.

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.

On October 9, 2017, the Governor of the State of California proclaimed a State of Emergency for Sonoma and other counties.

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.

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

On October 24, 2017, the Council adopted Ordinance No. ORD-2017-018, an urgency ordinance, amending the Zoning Code to add Section 20-28.100, Resilient City (-RC) Combining District, to facilitate rebuilding and implementation of resiliency initiatives to those parts of the City most severely impacted by the Fires. The Council also adopted Ordinance No. ORD-2017-019, an urgency ordinance, adding the -RC Combining District to the base District of those parcels impacted by the Fires.

On October 1, 2019, the Council adopted Ordinance No. ORD-2019-013, an urgency ordinance, amending the RC Combining District to address a mobile park closure process following a natural disaster. The modifications to specific sections of Chapter 6-67 Mobile Home Conversions were sought to clarify and streamline the preparation and consideration requirements of a relocation impact report (also known as a mobile home park closure report) specifically for a mobile home park severely damaged in the Fires.

On October 21, 2019, the Journey's End Mobile Home Park owner filed a request with the City to close the park and implement a relocation impact report.

On November 1, 2019, as directed by the City Code, the applicant/park owner sent a notice of application to mobile home park owners and tenants that were documented as residents just prior to the Fires. This notice included reference that a Relocation Impact Report was being prepared.

On December 2, 2019, as directed by the City Code, the applicant/park owner sent a notice of Informational Meeting to mobile home park owners and tenants that were documented as residents just prior to the Fires. This notice included a copy of the proposed Relocation Impact Report and also cited the targeted City Council public hearing date of January 14, 2020.

On December 16, 2019, an Informational Meeting was held in which the applicant team presented the Report and associated process. City staff was on hand to answer resident questions about the process. A housing specialist was on hand to answer questions about the proposed Report. Approximately 20 residents attended the meeting, as did several resource organization representatives.

On January 4, 2020, a Notice of Public Hearing was sent to the mobile home park owners and tenants that were documented as residents just prior to the Fires.

ANALYSIS

1. Section 20-28.100 J Resilient City Combining District – Mobile Homes

State law and local ordinance direct the process by which a mobile home park may be closed. The purpose of a park closure and relocation impact report is to document the impacts to park residents caused by the closure and to address the impacts through mitigation measures as a condition of conversion.

Pursuant to Council Ordinance No. ORD-2019-013, to approve a Relocation Impact Report, the Council must find that the mitigation measures proposed address the impacts caused by the conversion, closure or cessation of use of the mobile home park upon park residents in terms of:

- The 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 mobile home parks.

The Relocation Impact Report must address the following contents and requirements:

- Eligibility & qualified consultant
- Map and description of the park's conditions post disaster, including status of homes and infrastructure
- Status of park owners and renters
- Survey of comparable mobile home parks
- Analysis of impacts and mitigation measures to address impacts of closure and relocation
- The conditions must mitigate the adverse impact on the mobile home owner's ability to find adequate housing.

- The cost of the conditions must not exceed the reasonable cost of relocation after deducting any compensation received by the mobile home owner or tenant from other sources to compensate for displacement or damage arising from the disaster

Examples of conditions may include various forms of payment and/or the setting aside of a certain number of affordable units for the displaced should the park convert to another residential use

Another alternative is for the mobile home owners or tenants and the park owner to reach an agreement on mutually satisfactory compensation or other benefits to address the impacts of the closure.

The Journey's End Relocation Impact Report

The Journey's End Mobile Home Park consisted of a total of 160 homes and one manager's unit prior to the Fires in October 2017.

The subject Relocation Impact Report focuses on the 88 owners whose mobile homes were impacted by wildfire and who:

- Owned their mobile homes; and
- Whose homes were destroyed; and
- Who have not entered into an agreement with the park owner.

The applicant proposes mitigation in the form of payment in an amount roughly equal to six months average space rent and a one-month security deposit in the park; \$4500 per household. In addition to this payment, the Report acknowledges other sources of assistance such as the forgiveness of rent and utilities by the park owner immediately following the fire; Insurance proceeds and benefits; and the granting of priority to prior qualified residents for any new affordable housing units should the park site redevelop in the future.

Staff has reviewed the Report and finds it in compliance with Council Ordinance No. ORD-2019-013 in that all of the required contents are present or accounted for. In addition, all notification of the Report has been administered in accordance with the ordinance and in compliance with the City's public hearing notice regulations.

FISCAL IMPACT

Approval of this action will not have a fiscal impact on the General Fund. Application and public hearing fees cover the cost of review and processing of relocation impact reports.

ENVIRONMENTAL IMPACT

Adoption of the proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to the following exemptions set forth in the Public Resources Code and CEQA Guidelines.

Adoption of the Report is exempt from CEQA review as it is not a "project" pursuant to CEQA Guidelines section 15378.

Adoption of the Report 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 Relocation Impact Report would not in and of itself 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.

NOTIFICATION

On December 31, 2019, a Notice of Public Hearing was sent to the mobile home park owners and tenants that were documented as residents just prior to the Tubbs Fire in accordance with the City Code.

ATTACHMENTS

Attachment 1 – Public Correspondence
Resolution/Exhibit A

CONTACT

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