

Mobile Home Park Oversight and Enforcement

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Community Engagement Manager –
Housing & Community Vitality



1. Would Council like to move forward with a MHP licensing program that supports expanded enforcement strategies?
2. Are there additional outcomes or strategies Council would prioritize besides those in the staff recommendation?

Background

Comparison of Municipal Code & Enforcement Authority by Property Type

Strategies & Approach to Overcome Disparities in Outcomes

Next Steps – Staff Recommendation

Feedback Sought



Council Priority 1

Operationalize City resources to build and preserve affordable housing

Council Priority 2

Improve human and social health for vulnerable populations

Council Priority 7

Protect community water systems in an integrated way to ensure resilient water resources and healthy watersheds

Mobile Home Park Enforcement work aligns with housing, equity, & water efficiency strategies in:

- City Plan
- Equity 2023 Plan
- Fort Collins 2024 Strategic Plan
- Housing Strategic Plan
- Our Climate Future Plan



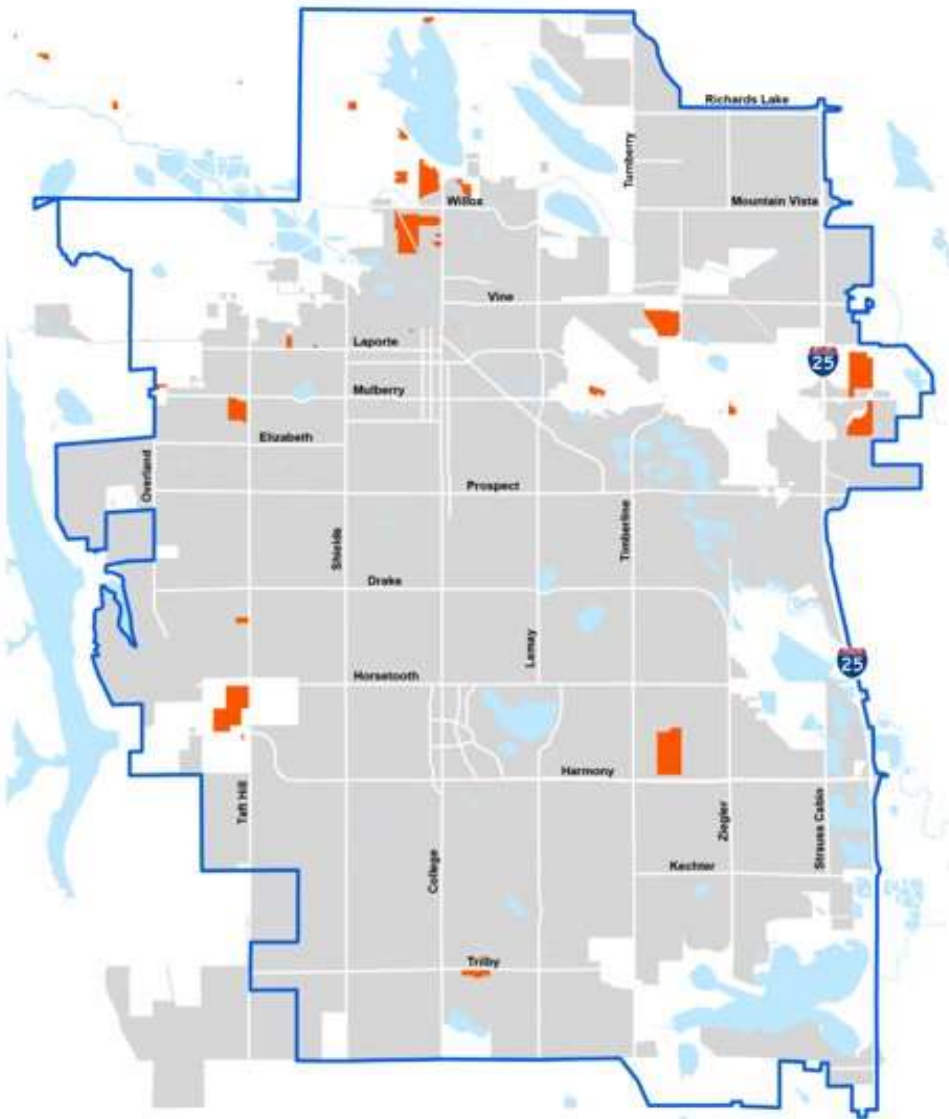


Mobile home parks are private, unsubsidized, “naturally-occurring” affordable housing.



- **Residents may own** their home, but the **land** it sits on is owned by the mobile home park.
- Mobile home parks are **private property**, as are their streets, water infrastructure, and most fencing and safety lighting.
- MHP neighborhoods in Fort Collins are home to some of the **largest concentrations of historically underserved populations** including non-English speakers, lower-income households, and senior citizens.



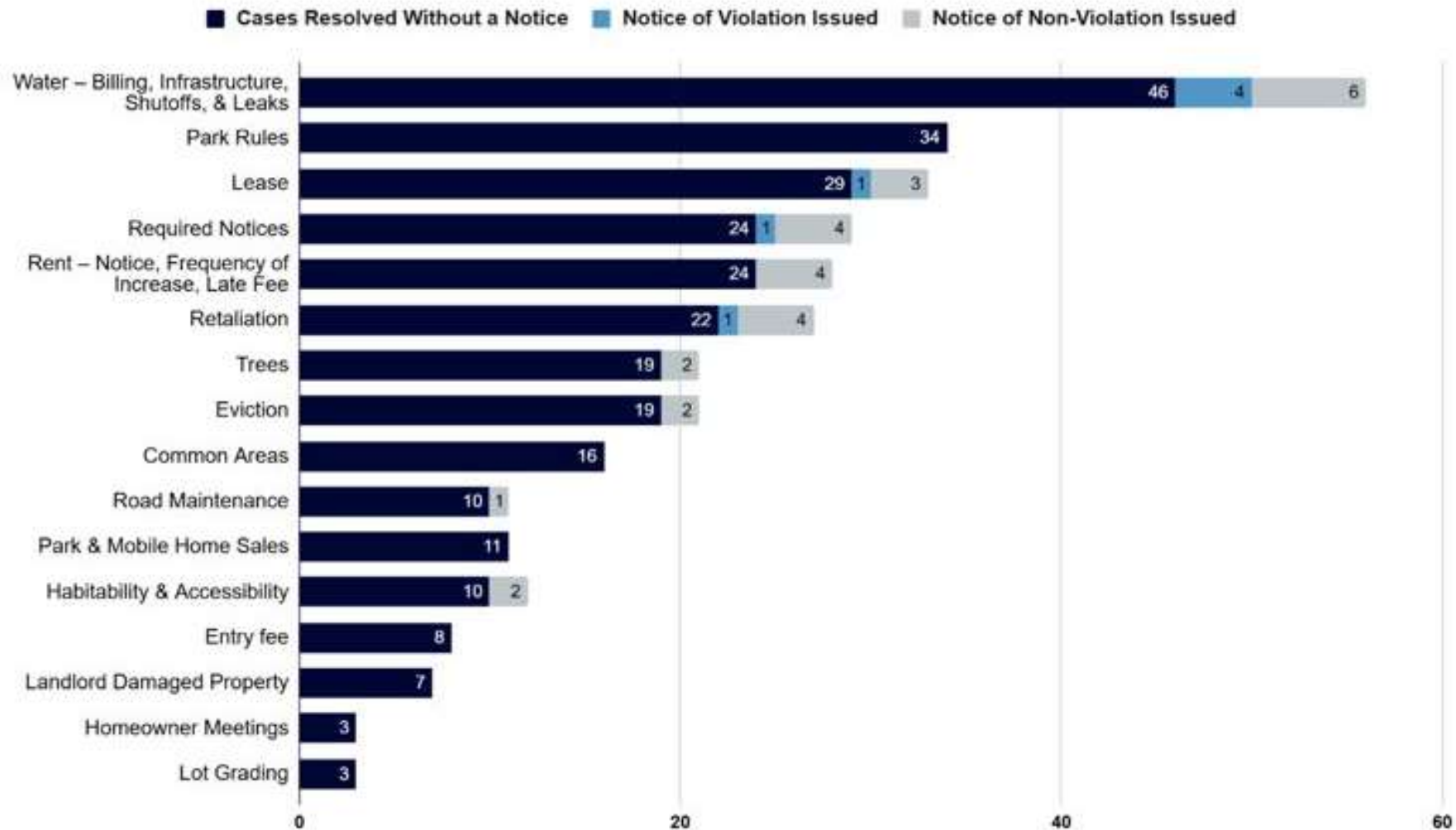
MHP Location Map



	City	GMA	Total
Communities	10	14	24
Home Sites	1,400	2,137	3,537

-  City Limits
-  Manufactured Home Community
-  GMA Boundary

Number of Fort Collins MHPOP Complaints and Enforcement Outcomes 2020-2024



What problems are we trying to solve?

Property Types have Different Oversight Responsibilities, Regulation, and Enforcement Levels; Creating Disparate Outcomes:

- Difference in Property Types
- Mobile Home Park Private Water Infrastructure vs. Public Water Systems
- Differences in Land Use Code Requirements and Municipal Code Enforcement by Neighborhood Type
- Legislative Authority Gaps



In enforcement and governance, MHP's are similar to:

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- HOA neighborhoods with private streets
 - Multiunit complexes
 - Water utility providers with private infrastructure

Comparison of Property Types - Land Use Code



SINGLE UNIT
DWELLINGS

MULTI-UNIT
DWELLINGS

MANUFACTURED
HOUSING DWELLINGS

Comparison of Land Use Code Requirements

	MOBILE HOME PARKS	SINGLE, DETACHED HOMES	MULTI-UNIT, ATTACHED HOMES
STREETS	<ul style="list-style-type: none"> • Private Streets • Required Connectivity to surrounding neighborhoods 	<ul style="list-style-type: none"> • Required Connectivity to surrounding neighborhoods • Public Streets that require: <ul style="list-style-type: none"> • Curb/Gutter • Sidewalks • Street Trees • On-street parking 	<ul style="list-style-type: none"> • Private Streets • Required Connectivity to surrounding neighborhoods
LIGHTING	<ul style="list-style-type: none"> • Maximum Lumens Regulated 	<ul style="list-style-type: none"> • Maximum Lumens Regulated 	<ul style="list-style-type: none"> • Maximum Lumens Regulated • Minimum Safety Requirements
TRASH	<ul style="list-style-type: none"> • Allows either communal trash or individual collection • Design requirement for trash enclosures 	<ul style="list-style-type: none"> • Allows either communal trash or individual collection • Design requirement for trash enclosures 	<ul style="list-style-type: none"> • Requires communal trash collection • Design requirement for trash enclosures
GATHERING SPACE	<ul style="list-style-type: none"> • Zoning District Dependent • Not required • If present, required to be within .25 mile of a park 	<ul style="list-style-type: none"> • Zoning District Dependent • Not required • If present, required to be within .25 mile of a park 	<ul style="list-style-type: none"> • Required to have plaza, courtyard, patio or garden
PARKING	<ul style="list-style-type: none"> • 1 parking space per dwelling unit 	<ul style="list-style-type: none"> • 1 space if street frontage > 40 ft • 2 spaces if ≤ 40 ft. 	<ul style="list-style-type: none"> • No minimum parking spaces

Comparison of Municipal Code Enforcement Authority



	MOBILE HOME PARKS 	SINGLE, DETACHED HOMES 	MULTI-UNIT, ATTACHED HOMES 
Complaint-based Rental Inspections	Yes	Yes	Yes
Trees that Cause Damage to Structures or Impede Egress (Complaint-based)	Yes	Yes	Yes
Leak Notification System Participation	No But Code Requires	No Voluntary Participation	No Voluntary Participation
Street Lighting	Complaint-based only	Yes	Complaint-based only
Speed Limits	No	Yes	No
Parking	No	Some Restricted to designated neighborhoods	No
Road Hazards	Complaint-based only	Yes	Complaint-based only
Water/Wastewater Infrastructure Assessment & Maintenance	No	Yes	Yes
Water Quality Testing	No	Yes	Yes
Hazardous Tree Abatement	No	Yes Threats to public or right of way only	Yes Threats to public or right of way only
Water Billing Audits	No But Code allows	Yes	Yes
Snow Removal	No Many do not have sidewalks and private streets do not have City snow removal	Some Based on capacity and street type priorities	Some Sidewalks in multi-unit complexes not enforced by City
Nuisance Code Inspections	Yes But currently complaint-based only	Yes	Yes
Emergency Contact Info Posting	Complaint-based only	N/A	N/A

Comparison of MHP Oversight Authority

MHPOP

- Park Rules
- Lease Terms
- Required Notice
- Rent Issues
- Retaliation
- Eviction
- Road Maintenance
- Park & Mobile Home Sales
- Entry Fee
- Landlord Damaged Property
- Language Access & Barriers
- Snow Removal (*new in 2025*)

MHPOP & City Overlap

- Water Shutoffs
- Water Billing & Leaks
- Posting Emergency Contact
- Tree Maintenance
- Homeowner Meetings

City of Fort Collins

- Accessory Structures
- Common Areas
- Habitability
- Lot Grading
- Neighbor-to-Neighbor Disputes
- Animal Control
- Water Quality (with CDPHE)

MHP Owner

- Water & Sewer Line Maintenance & Inspection
- Fences
- Speed Limits
- Security Lighting
- Availability of Management
- Frequent Management Changes
- Homeowner's & Renter's Insurance Requirements
- Parking & Towing

**Align Mobile Home Park needs with level of service
to achieve comparable outcomes with other neighborhoods.**



Root Causes of Disparate Outcomes for MHPs



Habitability



Infrastructure Information Gaps

Deferred Infrastructure
Investment & Maintenance



Accountability



Oversight & Enforcement
Fragmentation

Limited Enforcement Authority



Empowerment



Legal Complexities &
Power Dynamics

Engagement Barriers

88 Strategies: City-focused activities and MHP owner-focused standards and compliance

City focused MHP strategy progress in 2025

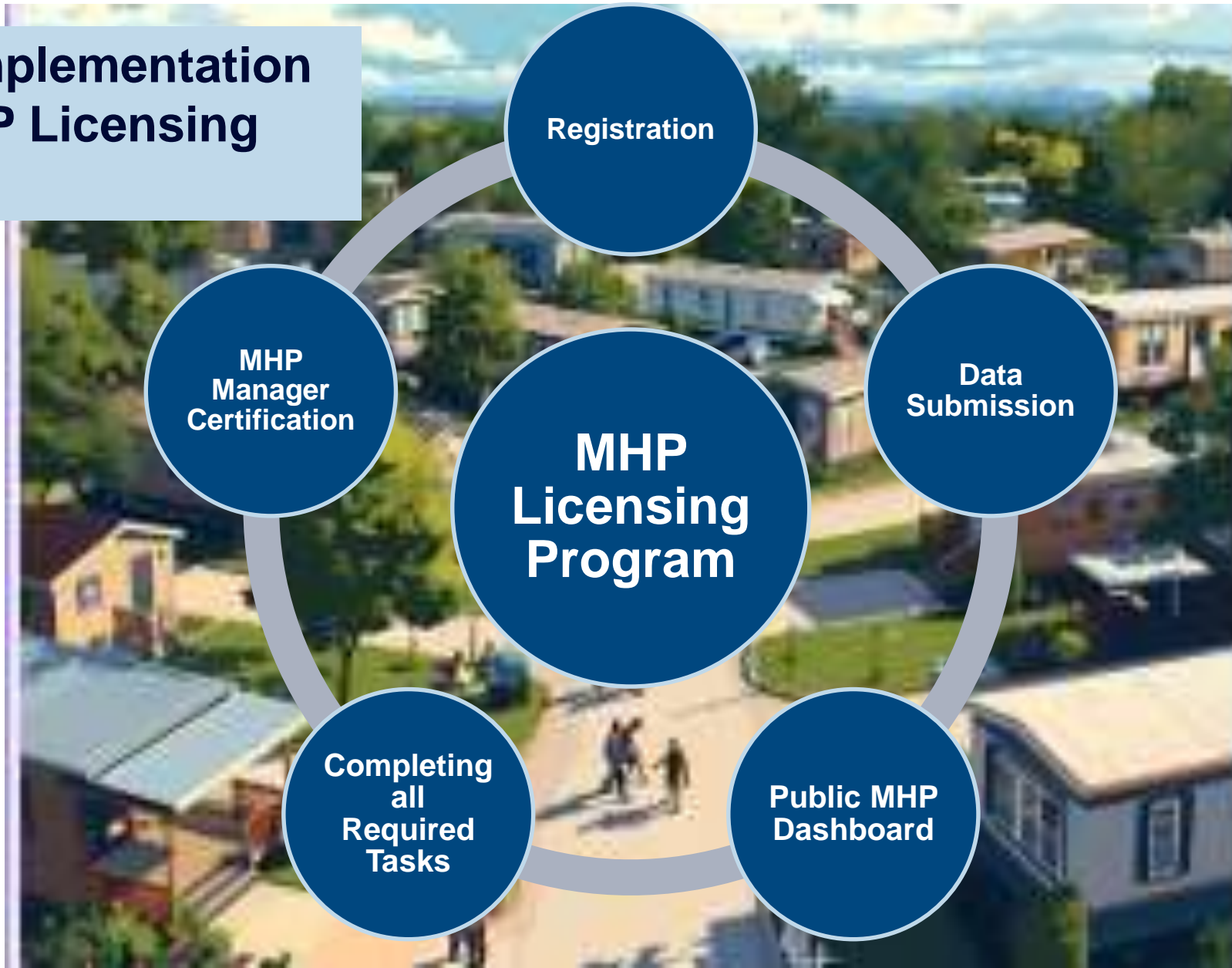
- 01 Shared data collection and analysis
- 02 Expanded education on Building Services
- 03 New Community Consultants opportunities
- 04 Water quality testing



MHP owner-focused strategies address 10 critical issues to improve outcomes

Outcome	MHP Issue
Safe, Functional Infrastructure	1. Water Infrastructure Maintenance 2. Water & Toilet Access during Outages 3. Water Infrastructure Leak Repair 4. Road Hazard Maintenance
Safe Green Infrastructure	5. Hazardous Tree & Canopy Maintenance
Safe Living Conditions	6. Speed Limit Enforcement Oversight
Accountability & Transparency	7. Water Rebilling Oversight 8. Lot Rent 9. Water Outage & Boil Water Notices 10. Park Rules

Proposed Implementation through MHP Licensing Program

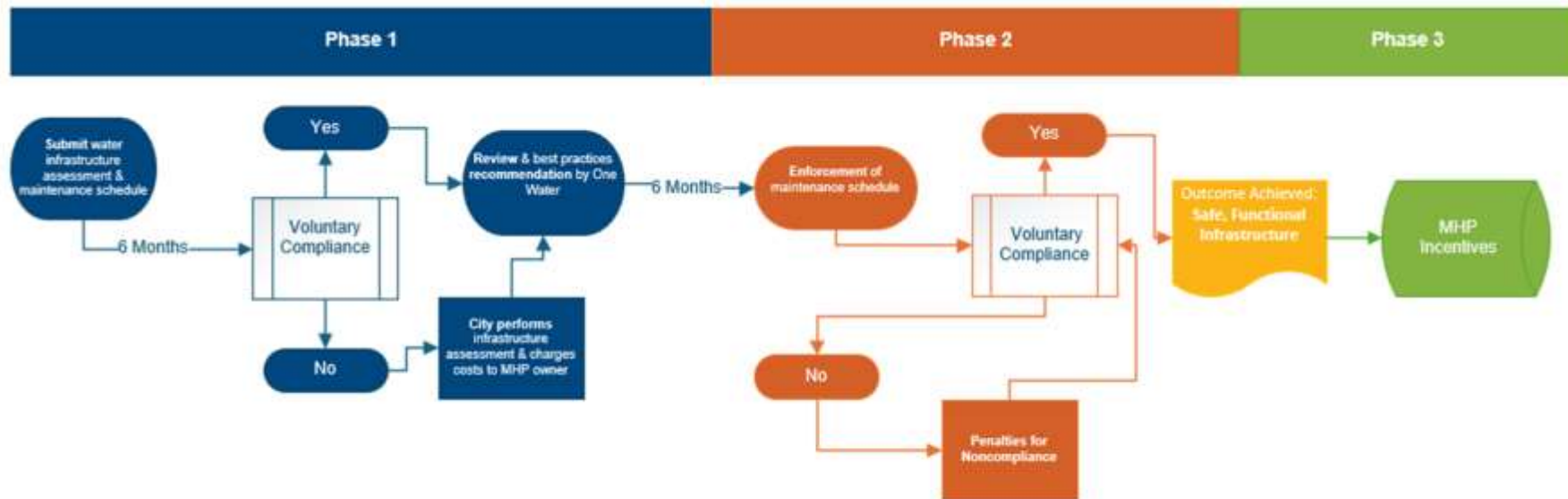


REQUIRED TASKS for MHP LICENSING	
Assessments of infrastructure & MHP condition	Voluntary mitigation or Abatement & cost recovery for infrastructure issues
Data submission	Compliance with maintenance schedules
Emergency abatement by City & cost recovery	Enforcement of water outage notices
Establish MHP owner enforcement standards	

Strategies for the 10 MHP issues integrated into flowcharts of **escalating enforcement** designed with:

- Voluntary compliance “off ramps”
- Time allowed before escalation
- Ability for each park to move through the phases of enforcement at an individual pace

General Process Overview



Criteria for prioritizing outcomes of enforcement escalations:

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- **Addresses** Life, Health, or Safety Risk
- **Need** for Urgent Intervention
- **Frequently Experienced Issue**
- **Anticipated** Potential for Impact of Strategy
- **Meets** other Priority Goals of the City, MHPOP, or community



1

Centralized Management & MHP Licensing Program

MHP Licensing Program

MHP Manager Certification

Resident's Rights Program

Voluntary Compliance
Efficacy Assessments

12-Month Evaluation & Outcomes
Based Recommendation

Address Urgent Issues & Charge MHP Owner for Service

2

Where MHP Owner is Non-Compliant, Authorize Staff to Address:

Outcome	Strategy
Safe, Functional Infrastructure	Provide potable water and toilet access for water outages of 12+ hours
Safe Natural Environment	Abate hazardous trees upon notice to MHP and City
Safe, Functional Infrastructure	Detect and abate leaks in private water infrastructure

3 Monitor & Address Longer-Term Issues

MHP Issue	Enforcement Strategies
Water Infrastructure Maintenance & Oversight	Infrastructure assessment, data submission, enforcement of maintenance schedule, penalties for non-compliance
Water Infrastructure Leaks	Leak notice program participation, required leak detection, required leak repair, MHPOP referral and penalties for non-compliance
Hazardous Tree & Canopy Oversight	Infrastructure assessment, data submission, enforcement of maintenance schedule & hazardous tree mitigation, abatement by City of hazardous trees, penalties for non-compliance
Water Outage & Boil Notices	Data submission, best practice recommendations & training from One Water & CDPHE

Recommended Municipal Code Updates

4

Require:

- **MHP Licensing Program participation**
- **Submission and public availability of data**
- **Assessments** of MHP infrastructure
- **MHP Manager certification**
- **Costs are not passed along** to residents for any portions of the program or compliance
- **MHP owner responsibility for damage caused by hazardous trees**

Authorize City Staff to:

- **Perform assessments** where MHP owner is non-compliant
- **Abate infrastructure issues** where MHP owner is non-compliant
- **Charge costs for assessments or abatement** to MHP owners for private property/infrastructure

Remove:

- **Proactive rental inspection requirements** for mobile home units

Staffing Assessment

Centralized Role	Functions	Scalability
MHP Program Point Person	<ul style="list-style-type: none"> • Central contact for internal and external coordination • Strategic planning • SOP development • Coordination with regulatory/enforcement entities & City departments • Outcome assessments • Data-driven decision-making & recommendations 	
Specially Commissioned Officer	<ul style="list-style-type: none"> • Administrative compliance • On-the-ground investigations • MHP Municipal Code enforcement • Coordination of contractors 	Support temporary enforcement surge
Program Coordinator	<ul style="list-style-type: none"> • Assist with MHP owner, manager, & resident engagement • Assist with administrative duties • Compliance support • Outreach planning & delivery 	Right-size based on programming

Next Steps – Staff Exploration of Funding Sources

Some Ideas Include



**MHP
Licensing
Fees**



**Manager
Certification
Fees**



**Non-
Compliance
Penalties**



**Grants, Nonprofit
or Federal/State
Funding,
Partnerships to
address blight**



**Fees for
Service**



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