

Mobile Home Park Oversight and Enforcement

JC Ward

Community Engagement Manager –
Neighborhood Services



- 1) Given the increase in complaint resolution at the State level, does Council want to consider local enforcement of issues that are governed by state regulations?
- 2) What priorities does Council have regarding the City's mobile home park work?
- 3) Who else should we bring into the conversation to inform this work?

Background

- Mobile Home Parks in Fort Collins
- City Mobile Home Park Activity Highlights
- Colorado Mobile Home Park Oversight Program

Current Oversight & Enforcement

Enforcement Gaps

Next Steps

Direction Sought

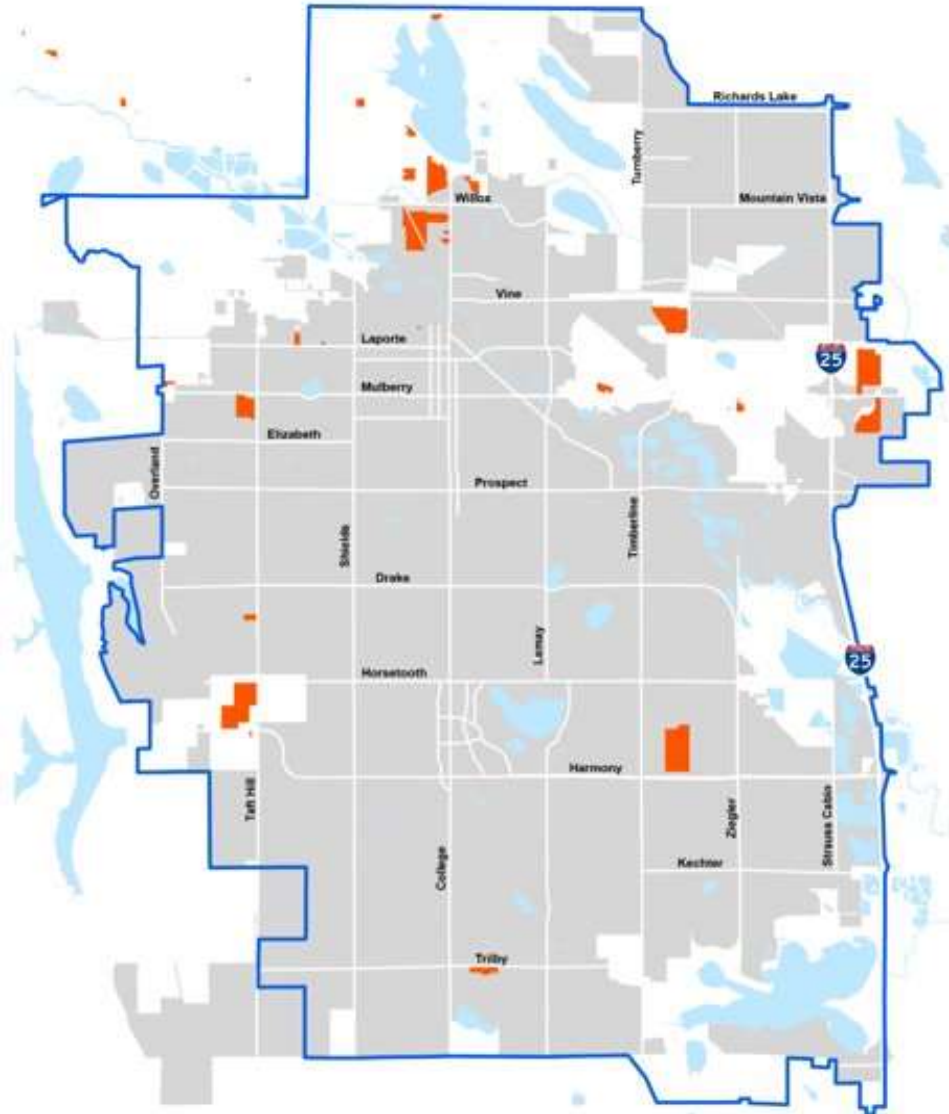


Mobile home parks are private, unsubsidized, “naturally-occurring” affordable housing.

- **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

Mobile Home Park Residents' Rights Work Team



Established 2019



Cross-departmental



Policy and Code enforcement efforts



Encourage collaboration among City departments



MHP mini-grants and mobile home improvement grants



Improves transparency and accessibility of resources



9 MHPs in Fort Collins rezoned for MHP preservation



Current City MHP Activities

Community Services			Police Services
Project	Education & Outreach	Enforcement of Municipal Code (Section 18)	Education & Outreach
Contributing Team	<ul style="list-style-type: none"> • Cultural Services • Natural Areas • Park Planning • Parks Department 	<ul style="list-style-type: none"> • Forestry** 	<ul style="list-style-type: none"> • Police Services

Information & Employee Services					
Project	MHP Webpage	Local Complaint System (Access Fort Collins)	Education & Outreach	Resident Association & Organizing Assistance	Community Conversations Focus Group
Contributing Team	<ul style="list-style-type: none"> • CPIO 	<ul style="list-style-type: none"> • CPIO 	<ul style="list-style-type: none"> • Equity Office 	<ul style="list-style-type: none"> • Equity Office 	<ul style="list-style-type: none"> • Equity Office

Fort Collins Utilities					
Project	Education & Outreach	Partner/Contractor Projects – CARE; LCCC	Broadband Infrastructure & Income-Qualified Services	Water Billing Transparency Code & Process Changes	MHP Mini-Grants
Contributing Team	<ul style="list-style-type: none"> • Energy Conservation • Income-Qualified Programs • Water Conservation • Water Field Operations • Water Quality Lab 	<ul style="list-style-type: none"> • Energy Conservation • External - Larimer County • External - Energy Outreach Colorado 	<ul style="list-style-type: none"> • Fort Collins Connexion 	<ul style="list-style-type: none"> • Customer Connections 	<ul style="list-style-type: none"> • Water Conservation

Planning, Development, & Transportation

Project	Education & Outreach	Complaint-Based Inspections & Enforcement	Local Nuisance Code Proactive Enforcement Rollout	Enforcement of Municipal Code (Section 18)	Section 18 Municipal Code Updates	Transportation Access Planning & Projects
Contributing Team	<ul style="list-style-type: none"> • Building Services • Code Compliance • FC Moves • Planning & Development Review • Transfort 	<ul style="list-style-type: none"> • Building Services • Rental Housing • Zoning Services 	<ul style="list-style-type: none"> • Code Compliance 	<ul style="list-style-type: none"> • Code Compliance 	<ul style="list-style-type: none"> • Code Compliance 	<ul style="list-style-type: none"> • FC Moves

Sustainability Services

Project	Education & Outreach	MHP Mini-Grants	MHP Home Improvement Grants (<i>limited to building envelope work for 2025-2026</i>)	Local & State Policy Analysis & Recommendations	Targeted Community Mediation & Community Mediators/Promotoras Program	Eviction Legal Fund Trainings & MHP Resident/Landlord Support	Complaint-Based Inspections & Enforcement	Grocery Rebate Program
Contributing Team	<ul style="list-style-type: none"> • Conflict Transformation Works • Economic Health Office • Environmental Services Department • Healthy Homes • Neighborhood Services • Urban Renewal Authority 	<ul style="list-style-type: none"> • Environmental Services Department • Healthy Homes • Neighborhood Services 	<ul style="list-style-type: none"> • Environmental Services Dept. • Healthy Homes • Neighborhood Services 	<ul style="list-style-type: none"> • Neighborhood Services • Social Sustainability Dept. 	<ul style="list-style-type: none"> • Conflict Transformation Works • External - Community Partners 	<ul style="list-style-type: none"> • External – Community Partners Neighborhood Services 	<ul style="list-style-type: none"> • Rental Housing 	<ul style="list-style-type: none"> • Social Sustainability Department

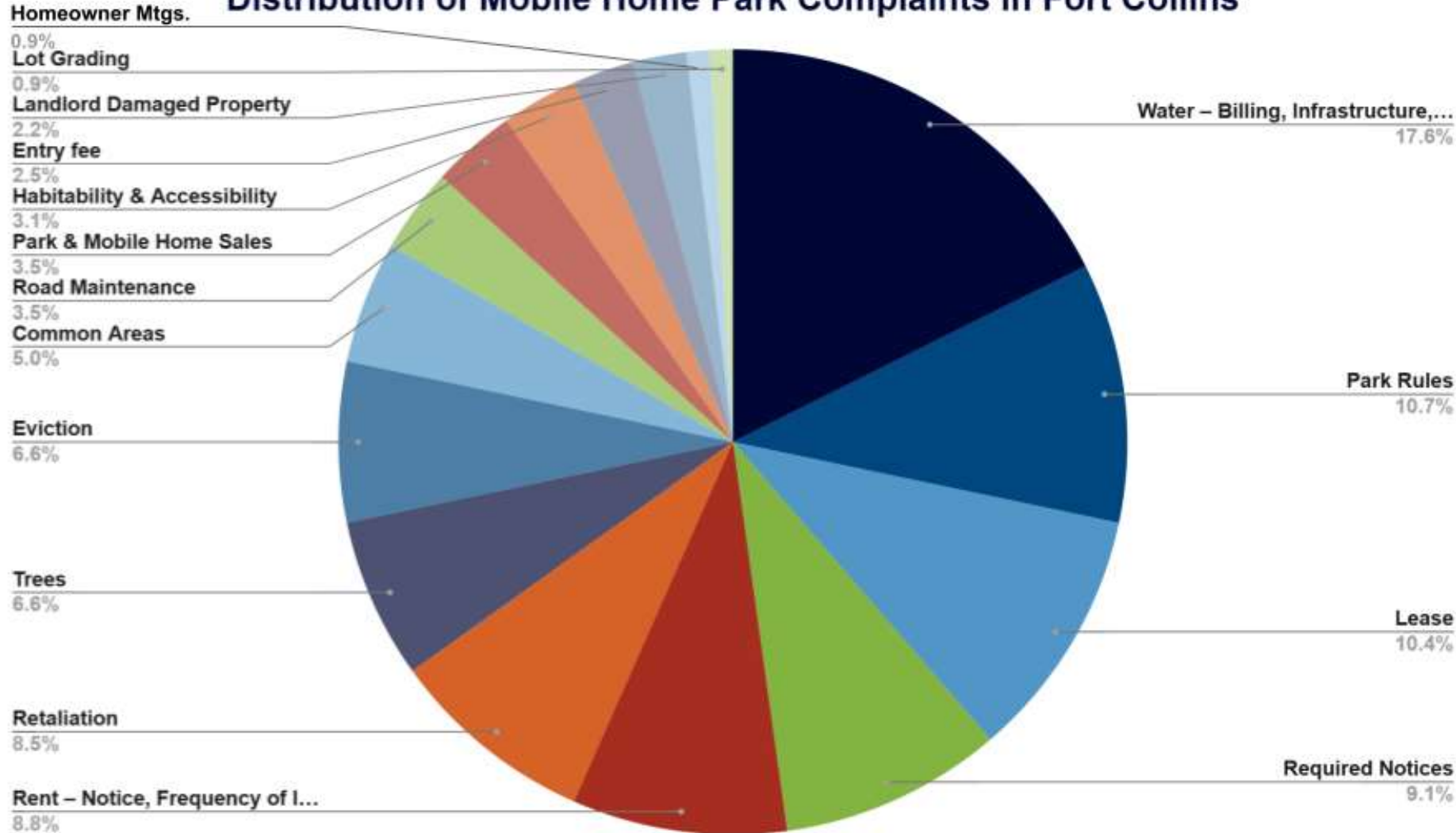
Sustainability Services Neighborhood Services				
Resident Association & Organizing Assistance	MHP Handbook	Maintenance Responsibilities Code Changes	Limitation of Required Upgrades	Local Complaint System (Access Fort Collins)
MHP Webpage	Maintenance Responsibilities Code Changes	Limitation of Required Upgrades	Local Complaint System (Access Fort Collins)	MHP Webpage

The Colorado Mobile Home Park Oversight Program:

- Began operating in **May 2020**, allowing mobile homeowners, property managers, and owners to **file complaints**.
- **Has subpoena power** for records related to their investigations, **ability to levy** monetary penalties for violations of the Act, and **power to issue** cease and desist orders.
- Requires mobile home park owners to **register annually** and maintains a statewide database of registered parks.



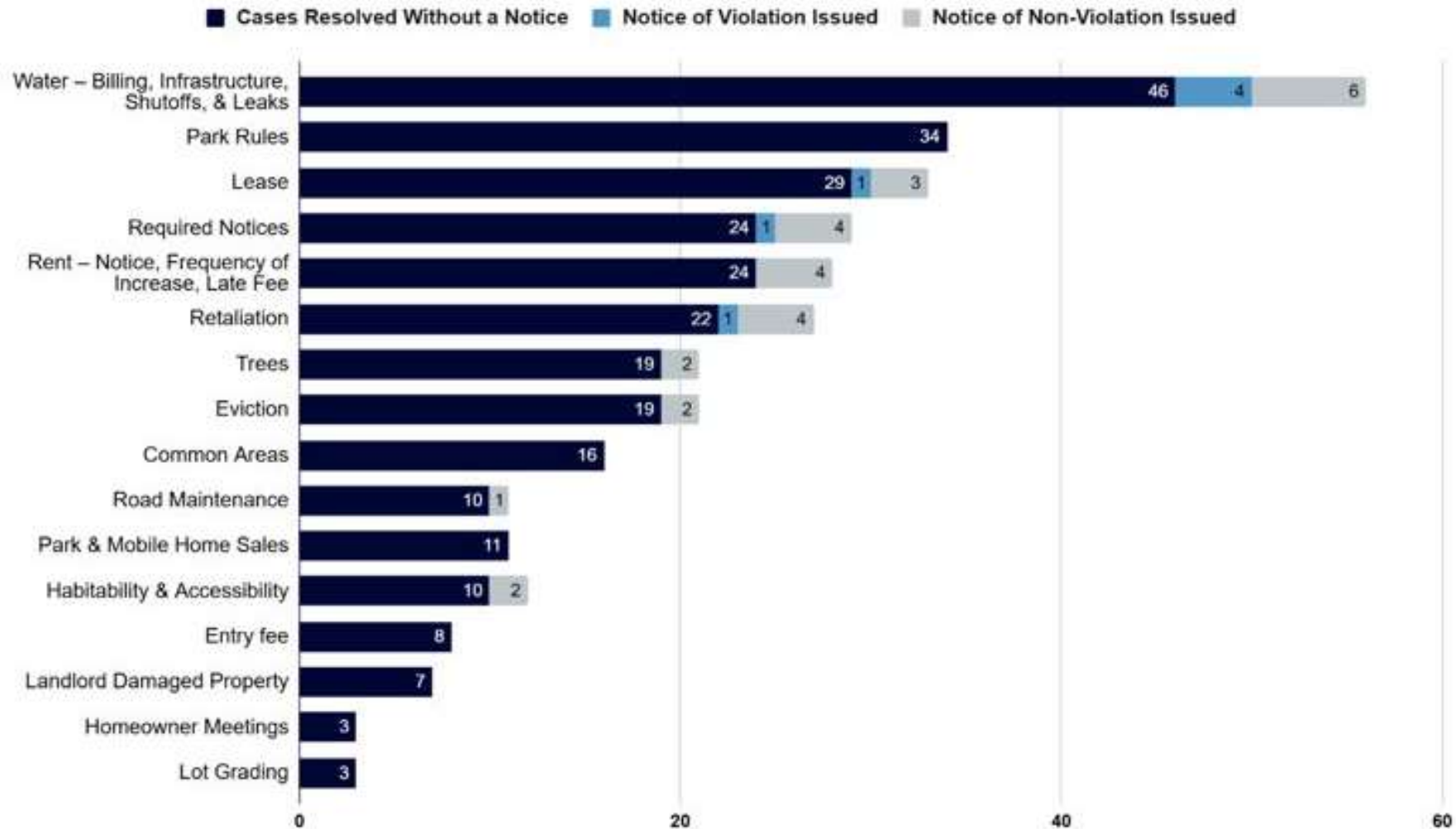
Distribution of Mobile Home Park Complaints in Fort Collins



Key Data

- 318 complaints from Fort Collins residents since 2020
- 29 Notices of Non-Violation
- 7 Notices of Violation
- 11 cases still open

Number of Fort Collins MHPOP Complaints and Enforcement Outcomes



Overlaps & Gaps in MHP Enforcement

Sample of Current MHP Enforcement in Fort Collins

	MHPOP	City Staff	No Enforcement
Water Shutoffs		Fort Collins Utilities assists if shutoff is due to City water line issues	
Water Billing, leaks		Neighborhood Services has billing audit access	
Water & Sewer Line Maintenance & Inspection			
Park Rules			
Accessory Structures			
Fences			
Lease			

Overlaps & Gaps in MHP Enforcement

MHPOP	MHPOP & City Overlap	City of Fort Collins	None
<ul style="list-style-type: none"> • Park Rules • Lease Terms • Required Notices • Rent Issues • Retaliation • Eviction • Road Maintenance • Park & Mobile Home Sales • Entry Fee • Landlord Damaged Property • Language Access & Barriers (<i>new in 2024</i>) 	<ul style="list-style-type: none"> • Water Shutoffs • Water Billing & Leaks • Posting Emergency Contact • Trees • Homeowner Meetings 	<ul style="list-style-type: none"> • Accessory Structures • Common Areas • Habitability • Lot Grading • Neighbor-to-Neighbor Disputes • Animal Control • Water Quality (<i>with CDPHE</i>) 	<ul style="list-style-type: none"> • Water & Sewer Line Maintenance & Inspection • Fences • Speed Limits • Security Lighting • Availability of Management • Frequent Management Changes • Homeowner's and Renter's Insurance Requirements • Parking & Towing

- **Infrastructure & Maintenance Issues:**
 - No on-the-ground inspectors from MHPOP for complaints like tree assessment, snow removal, or lot grading
 - No oversight by technical experts for maintenance/repair of water lines or enforcement of repairs
 - Limited or no jurisdiction for oversight of road maintenance, streetlights, speeding, fences, or parking issues
- **Resident Barriers to Self-Advocacy:**
 - Fear of retaliation from landlords and no local investigation of retaliation
 - Frequent changes in property management and lack of training
 - No enforcement of manager availability during office hours
 - No state-level mediation services
- **Lack of Coordination Between Agencies:**
 - Confusion over which entity (City or MHPOP) handles specific complaints
 - Navigating issues within a complex network of enforcement agencies (like water access during shutoffs)





Promote
Resident
Awareness &
Empowerment



Improve
Livability,
Habitability,
& Safety



Preserve
Housing
Affordability

Potential Areas for Staff Evaluation:

- **Ways to coordinate with MHPOP on specific complaint types** that align with City Staff expertise. Explore options for payment or service models to fill gaps in investigations.
- **Cost analysis** to increase local capacity for mediation and community-based promotoras for earlier, efficient resolution of conflict between parties.
- **Partnerships and negotiated investment opportunities with property owners** to provide or assist in making infrastructure assessments and recommendations.
- Coordination of a **template library** for enforceable park rules and lease terms based on MHPOP's determinations

Potential Low-Cost Activities or Tradeoffs for Existing Resources



Explore avenues for technical assistance, education, or other tools to assist with infrastructure issues. *(Not including repair or replacement of infrastructure.)*



Examine options for City Staff or contractors to assess park conditions and recommend preventative maintenance schedules, repairs, and community plans for road safety, dangerous trees, parking, streetlights, and snow removal.



Improve coordination and strategic planning of MHP work in Fort Collins to better address existing concerns, emerging issues, and available resources.



Strengthen external language access requirements and enforcement for MHPs under the new State law.



Expand existing trainings and educational opportunities to specifically apply to mobile home parks.



Update Municipal Code to protect the right to install fences and require MHP manager certification.

Municipal Code Changes that Would Require Additional Resources

- ◆◆◆◆◆ **Require** annual submission of tree maintenance plans, emergency contact information and office hours, water pressure compliance reports, parking and towing policies; establish timelines to address concerns and penalties
- ◆◆◆◆◆ **Establish** timeline for water infrastructure leak repairs and penalties
- ◆◆◆◆◆ **Establish** the right of entry for educational assessments (upon resident request) of infrastructure
- ◆◆◆◆◆ **Adopt** State requirements and local enforcement for MHP notices
- ◆◆◆◆◆ **Establish** water rebilling methodology and disclosures for MHPs that charge for rent with "water included" or work with MHPOP to close the loophole
- ◆◆◆◆◆ **Authorize** the City to provide emergency water services and portable toilet access for service disruptions longer than 12 hours and charge the MHP for these services
- ◆◆◆◆◆ **Authorize** the City to provide emergency repairs for unsafe/hazardous road conditions and charge the MHP for this service

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